

London Borough of Camden

Euston Area Plan Update 2026
Regulation 22(1)(c)
Consultation Statement

Euston Area Plan Update - **Regulation 22(1)(c) Consultation Statement**

This Consultation Statement is split into seven parts:

Part 1: Introduction

Part 2: Summary of consultation of Regulation 19 Euston Area Plan Update Proposed Submission Draft

Part 3: Summary of consultation on the Regulation 18 Draft Euston Area Plan Update

- 3a) Consultation on Draft Euston Area Plan Update 2023
- 3b) Summary of 'direction of travel' consultation – 2024
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Part 4: Early engagement undertaken to inform the preparation of the draft new Euston Area Plan Update

Part 5: Specific and General Consultation Bodies

Part 6: Statement of Fact and Statement of Representations

Part 1

1.0 Introduction

- 1.1 The London Borough of Camden is in the process of updating the Euston Area Plan (EAP). It is a long-term planning framework to guide transformational change in the area, focused on the redevelopment of Euston station, adopted in 2015. It sets strategic policy for new development in the Euston area, illustrating where new open spaces and buildings could be, what their proposed uses could be (homes, shops, employment, community facilities), guidance on important design considerations and enabling sustainable travel in and through the area. It seeks to secure benefits from regeneration for the local community and London as whole. The Council took the decision to update the Euston Area Plan in 2020 and began consultation through a Call for Sites Exercise in 2021.
- 1.2 Under Section 19 of the Planning and Compulsory Purchase Act 2004 (“the 2004 Act”), a local planning authority must prepare development plan documents in accordance with the requirements of the Act and the procedures prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.3 Sections 19(1) and (3) of the Planning and Compulsory Purchase Act 2004 require development plan documents to be prepared in accordance with the Council’s [Local Development Scheme](#) and [Statement of Community Involvement](#). The Council is satisfied that both these documents have been complied with in preparation of the EAP Update which this statement demonstrates.
- 1.4 This Consultation Statement has been produced in accordance with Regulation 22 (1(c)) of the Town and Country Planning (Local Planning) (England) Regulations 2012, which states that a consultation statement must be produced to show:
- i. which bodies and persons the local planning authority invited to make representations under regulation 18 (see part 4)
 - ii. how those bodies and persons were invited to make representations under regulation 18 (see part 3)
 - iii. a summary of the main issues raised by the representations made pursuant to regulation 18, (see part 3)
 - iv. how any representations made pursuant to regulation 18 have been taken into account; (see part 5)
 - v. The number of representations submitted a Regulation 19 stage and the main issues raised.
- 1.5 The consultation requirements for plan preparation are set out principally in Regulations 18 and 19 of the 2012 Regulations. Regulation 18 requires a local planning authority, when preparing a plan, to notify and invite representations from such persons as it considers appropriate about the subject of the plan. The purpose of Regulation 18 is to enable engagement with interested parties during the plan preparation process. A detailed summary of this consultation is available in the [Regulation 18 consultation statement](#) and a high-level summary found below in Part 5.
- 1.6 Regulation 19 provides for consultation on the proposed submission version of the local plan prior to submission to the Secretary of State under Regulation 22. This

stage enables representations to be made regarding the legal compliance and soundness of the proposed plan.

- 1.7 Section 19(3) requires that the Council comply with its SCI in preparing local development documents. The SCI explains how it involves the community in preparing its planning policies in (Chapter 3, from page 8). It does not impose rigid or prescriptive requirements as to the number or scope of consultations; rather, it sets out overarching principles and commitments to be applied proportionately. Table 1 (page 10) outlines the stages in preparing a local plan document. Relevant extracts include:

- **Public participation in the preparation of the plan (Regulation 18)**
We will consult on the proposed content of a Plan. This may involve more than one stage of consultation depending on the document and the nature and scale of the issues involved. Getting involved at this stage allows you to have influence over the content of the plan at an early stage. Formal consultations will run for a minimum of six weeks. We will consider the representations received when drafting the plan.
- **Publication and submission of plan to government (Regulation 19,20 and 21,22)**
We will consult on the ‘submission’ version of the plan for a minimum of 6 weeks. This stage is for parties to submit comments on the ‘soundness’ of the plan, in line with the soundness tests set out in the National Planning Policy Framework, prior to its submission to the government for examination. A summary of all the consultation undertaken, the main issues raised and how these were taken into account will be submitted alongside the plan in a Consultation Statement.

- 1.8 The Council has complied with its SCI by:
- i. undertaking two rounds of Regulation 18 consultation (6 January 2023 to 27 February 2023 and 10 July 2024 to 11 September 2024), each exceeding the six-week minimum;
 - ii. publicising those consultations widely using appropriate and proportionate methods;
 - iii. inviting and considering representations from residents, stakeholders, landowners and community groups;
 - iv. undertaking the Regulation 19 consultation between 9th January 2026 and 3rd March 2026, also exceeding the six-week minimum; and
 - v. ensuring ongoing engagement throughout the plan-making process.
- 1.9 The SCI recognises that consultation methods and stages will vary depending on the nature and evolution of the plan. Importantly, it does not require re-consultation whenever new or amended proposals emerge. Therefore, the Council can demonstrate that there has been consultation at the earliest stages of plan preparation, in accordance with the SCI and the statutory framework.
- 1.10 The Council carried out a Regulation 18 consultation in January 2023. The proposed update to the EAP was published for consultation and engagement for 6 weeks to enable residents, businesses, community groups, landowners and other key stakeholders to share their views on the Plan’s policies and approach. As part of the consultation, a “Call for Sites” exercise was held.
- 1.11 Following a pause to HS2 work at Euston, a further consultation was carried out in Summer 2024 on the “direction of travel” of the EAP Update in response to the changes

and uncertainty following the Government's announcements regarding HS2 and Euston. All comments received were considered alongside the 2023 consultation responses to inform the proposed submission draft of the EAP.

- 1.12 The most recent consultation was undertaken pursuant to Regulation 19 of the 2012 Regulations and relates to the proposed submission version of the plan. This consultation finished on the 3rd March 2026. Representations made during this consultation will accompany the plan when it is submitted to the Secretary of State under Regulation 22 and will be considered by the independent examining Inspector as part of the examination process under section 20 of the Planning and Compulsory Purchase Act 2004.
- 1.13 Through the plan-making process, proposals have evolved in response to consultation responses, updates to the evidence base, site promotions by landowners and ongoing technical assessment. Potential development opportunities have emerged through that process, including through landowner representations and the ongoing assessment of development opportunities in the Euston area. The statutory plan-making process anticipates and accommodates the evolution.
- 1.14 Creating the updated Area Action Plan involves multiple stages of consultation to ensure it is well-informed and robust.

These stages are designed to:

- Enable early and continuous engagement with communities, businesses, and organisations.
 - Gather input to shape a plan that reflects local needs and priorities.
 - Produce a comprehensive document covering strategy and planning policies for the area which evolves with the consultations.
- 1.15 Below is a timeline of the plan production with key Plan stages undertaken and main consultation periods of the Euston Area Plan Update until submission date in September 2026.

1. Identify issues and collect evidence 2020

The policies in the adopted EAP 2015 were reviewed in 2020 and any gaps in policies or evidence identified. A decision by the Council was taken to partially update the EAP to take account of changing circumstances affecting the area was taken. Call for Sites Exercise was advertised.

2. Regulation 18 Euston Area Plan Update consultation 2023

The Council consulted on a full draft version of the updated EAP in 2023 that combined the updated evidence base, technical assessments, previous consultation responses and internal comments. Consultation was open for a 6 week period.

3. Supplementary consultation on EAP Update 2024

In March 2023, the Government announced a pause to HS2 works at Euston, while strategic decisions were made about the future of Euston.

With the publication of its Network North paper in October 2023, the Government confirmed that HS2 will come to Euston.

The Council held a supplementary consultation to set out the recent Government announcements about Euston and how it thought these may impact the EAP Update. This included some details of potential site allocations.

4. Plan amendments 2024-2026

The Council considered all comments received from both consultations.

Evidence base documents were updated (Open Space Study and Transport Assessment) or commissioned (e.g. Viability Assessment) to improve the Euston Area Plan Update ready for formal consultation and submission to the Secretary of State.

5. Regulation 19 consultation January 2026

The Council published a submission ready version of the plan for stakeholders and the public to comment on for a minimum of 6 weeks. In accordance with the Regulations, this consultation was formal and statutory seeking specifically the Plan's soundness for Examination in Public.

6. Submission to the Secretary of State September 2026

The Council assessed the comments received during the Regulation 19 formal consultation and considered that the Euston Area Plan Update is sound, therefore, can be submitted for Examination in Public (EiP). The Plan will be submitted to the secretary of State in September 2026.

Part 2: Summary of consultation of Regulation 19 Euston Area Plan Update Proposed Submission Draft

- 2.1 The following section responds to (v) of Section 22 (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. This relates to representations made pursuant to regulation 20, stating the number of representations made and a summary of the main issues raised in those representations.
- 2.2 The EAP Update Proposed Submission Draft with Sustainability Appraisal was published for consultation on 9th January 2026 until 3rd March 2026 to enable residents, businesses, community groups, landowners and other key stakeholders to share their views on the soundness of the Plan. The Council consulted specific consultation and statutory bodies, local amenity and residents' groups, businesses and individual residents. A variety of consultation techniques were used in accordance with the Statement of Community Involvement.
- 2.3 The Plan was available to view online on the Euston Area Plan website, Euston Area Plan Commonplace website and the Council's consultation hub "We Are Camden" website. Responses were invited to be made using the response form provided on our website and by email and letter.
- 2.4 A hard copy of the EAP Update - Proposed Submission Draft was also available to view at Pancras Square Library and Camden Town Library. This was advertised on our website and on the promotional material we sent out. The consultation on the Euston Area Plan Update Regulation 19 Proposed Submission Draft was widely advertised through the following channels:
 - An email sent to our consultation database (788 (planning policy)+ 472 (Euston specific) contacts), neighbourhood forums and Members. We also asked other services to email their contacts
 - We are Camden consultation page;
 - The Council's social media platforms, including Facebook and Nextdoor;
 - Notification in the Council's business newsletter
 - An advert in the Camden New Journal;
- 2.5 A list of the 'specific consultation bodies' we consulted with (as stipulated by the Regulations) and the 'general bodies' we consulted with are set out in Part 6 of this report. Details of consultation undertaken with statutory bodies is also set out in the Council's Statement of Co-operation.
- 2.6 Through the production of the EAP update, the Council held a series of meetings with planning officers from neighbouring planning authorities where there were strategic issues to discuss (City of London, Islington, and Westminster) and with the Greater London Authority, Transport for London and the Master Development Partner Lendlease. Meetings were also held with major landowners, including Royal Mail, UCL, Network Rail, and HS2 Ltd.
- 2.7 In total, the Council received 66 representations made under Regulation 20 (in response to consultation at Regulation 19 stage). Whilst the Council received a number of objections and suggested amendments to the Plan, there were also a number of representations in support of the approach that the Council are taking,

particularly in relation to EAP objectives, site allocations, open space, health and wellbeing and the natural environment. The representations are summarised below and copies of representations made in accordance with regulation 20 will be published on submission to the Planning Inspector.

2.8 Representations were received from:

- Ampthill Square Tenants and Residents Association
- Bloomsbury Conservation Area Advisory Committee
- Camden Civic Society
- Camden Swifts Group
- Canal and River Trust
- Climate Emergency Camden
- Derwent
- Drummond Street TRA
- Environment Agency
- GLA
- Historic England
- Hodge, Jones and Allen Solicitors
- HS2 Ltd.
- Lendlease and Landowners Representative
- London Property Alliance
- London St Pancras High Speed
- Members of the public/residents
- Natural England
- National Grid Electricity Transmission (NGET)
- NHS
- Premier Inn
- Regents Park Conservation Area Advisory Committee
- Royal Parks
- Sport England
- Shurgard
- Somers Town Neighbourhood Forum
- St Pauls Cathedral
- Thames Water
- Tolmers Square Action Group
- Tolmers Village Forum
- Woodland Trust

Main Issues raised

2.9 Below is a summary of what the Councils considers are the main issues raised in response to the Regulation 19 consultation

Summary of Comment	Council Response
Support for the EAP Update A number of responses were received highlighting support for the Euston Area Plan Update Proposed Submission Draft.	Support welcomed
Viability: request for bespoke affordable housing and workspace policies The Landowner's Representative submitted a response which suggested that the EAP should be a self-contained development plan with a completely new set of policies instead of relying in parts on the Local Plan. Highlighting that they consider that there needs to be bespoke affordable housing and workspace requirements with a specific evidence base.	The Council consider that the existing policy framework, provided by the Local and London Plans includes sufficient flexibility to account for variances in viability and that bespoke policies for affordable housing and workspace are not necessary in the EAP, nor are they justifiable given the level of information available at this stage. The evidence base reflects the best information available. Given the prolonged nature of the scheme and the uncertainty around designs and costs, the viability information is consequently limited at this stage. The Council worked closely with land owners to establish inputs into the work in line with national guidance and both parties recognised the limitations of the available information. Coupled with the flexibility in the existing London and Local Plan policies and the recognition that the viability could change over the 25+ years of the EAP Update, it is considered appropriate to seek affordable housing and affordable workspace in line with Local Plan and London Plan policies. Proposed modifications discussed as part of the examination of the Local Plan and in response to the Reg 19 consultation on the EAP Update provide extra clarity on this and highlight the particular challenges with the Euston masterplan area.
Consultation Concerns were raised about the consultation carried out on the Plan. This was largely in relation to site allocations at 250 Euston Road (EA4) and Euston Square Hotel (EA5) and their inclusion in the proposed submission draft of the EAP Update.	The Council has complied with the consultation requirements set out in Regulation 18 and the Camden's Statement of Community Involvement. In the July 2024 consultation (Regulation 18), 250 Euston Road was identified as a site allocation. For the Regulation 19 consultation, a further site allocation was identified at Euston Square Hotel (EA5) and 'Development and Design Principles' were provided for this site; and 250 Euston Road (EA4) was now identified as a potential location for taller buildings with the provision of an indicative height as well as detailed 'Development and Design Principles'. Through the Regulation 19

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	consultation process, the Council has had the opportunity to take account of the consultation responses and have proposed modifications in response to these.
Site Allocations A number of responses were received in relation to 250 Euston Road and Euston Square Hotel issues raised include: • Impact on Tolmers Square properties • Height of proposed tall building • Construction impacts • Impact on open space • Loss of current health uses	Proposed changes to site allocation, to include: • reference to health uses, • clearer expectations around retention of existing building and open space • reduction in proposed height.
Heritage Historic England, the Regent's Park Conservation Area Advisory Committee and St Paul's Cathedral submitted responses relating to the heritage impact of the proposals – highlighting concerns about the potential impact of tall buildings.	Proposed modifications have been discussed with Historic England and are suggested in order to provide greater clarity with specific reference to heritage assets and existing policies.
Open Space HS2 and the Euston Landowners submitted a response which sought clarity on the HS2 Act and Undertakings in relation to open space. Local resident groups highlighted the need for an open space strategy to apply to the whole area.	Proposed modifications which seek to address HS2's concerns are being discussed and proposed modifications are in the process of being drafted.

Detailed summary of Regulation 19 consultation responses

2.10 This statement will now summarise the responses received to the regulation 19 consultation and set out the Council's response, organised by EAP Chapter. Exceptionally, the Council has considered the need for further modifications to the proposed submission draft EAP and where justified this is explained within the table (a separate schedule of proposed modifications has been prepared).

Overarching Comments

2.11 Approximately 14 responses were received in relation to the whole plan/ were not easily attributable to a specific chapter, comments were received from:

- GLA
- Landowner Representatives
- Premier Inn
- Regent's Park Conservation Area Advisory Committee (CAAC)
- NHS
- London Property Alliance

Summary of Comment	Council response
Support overarching regeneration objectives of the EAP	Support welcomed.
Welcomes the positive and ambitious approach being taken by 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. The vision for the EAP aligns with the vision for Euston set out in London Plan 2021 Policy SD1 and is supported by the Mayor.	Support welcomed
Lendlease and the Euston Landowners noted the collaboration between Partners and several positive changes to the Plan since Regulation 18 stage. They highlighted what they believe is a flawed relationship between the EAP Update and the emerging Local Plan, specifically regarding the position on development viability, affordable housing and affordable workspace and associated evidence base. No proper regard has not been had to whether	Support welcomed The Council do not agree there is a flawed relationship. Policy S2 was introduced in the Camden Local Plan Proposed Submission Draft in response to comments received on the draft Camden Local Plan at Regulation 18 stage, with the aim of providing an overarching Euston policy context to support the Euston Area Plan. Modifications were proposed as part of the process to provide greater clarity and a topic paper has been prepared to support Policy S2 Euston Area in the Camden Local Plan Proposed Submission Draft 2025 in order to provide additional

Summary of Comment	Council response
the Euston development is deliverable if general (Local Plan) policies are applied without regard to viability. The Landowners Representatives consider that EAP should be self-contained development plan with bespoke policies applied. They suggest that should the references and linkage with the emerging Local Plan not be removed from the EAP Update, it means that further progress on the EAP is premature and needs to await the outcome of the emerging Local Plan examination process because the draft EAP is relying on and referring to a not-yet-adopted Local Plan that will likely be the subject of further modification as part of the examination process	background information to the Planning Inspector on the relationship between the Camden Local Plan and the Euston Area Plan to provide further justification for the approach taken. The Viability Assessment for the Local Plan tests the ability of developments across the borough (including within the Euston Area) to accommodate the policies in the draft Local Plan alongside prevailing rates of CIL. Due to the extraordinary costs associated with the delivery of a new station at Euston and developing over a railway line, the viability assessment work for the EAP concentrates on the station and tracks area and the 'Cutting' (areas where development sites are affected by extraordinary costs associated with developing over railway infrastructure). The Local Plan viability work focuses on the assessment of the viability of the non-railway sites. Modifications proposed to chapter 5 to highlight further the specific challenges. Overall, the Council considers the evidence base to be proportionate and responds to the information that was available, no further information is available at this stage.
The Regents Park CAAC question whether the Plan can be regarded as consistent with national policy and so sound. They suggest that the EAP seems to rely on unfounded assertions rather than evidence, and in doing so undermines the protection and enhancement of our historic environment.	Various supporting documents provide up-to-date evidence about the historic environment in the Euston area. In addition, relevant conservation area appraisal and management strategies and the London View Management Framework were taken into account when preparing the EAP Update and when testing and updating the site capacity for the Euston Station masterplan area and for previously identified sites as well as additional sites identified through the call for sites. The Council considers that it can demonstrate a well reasoned and robust rationale and is preparing a topic paper on this issue to support the Plan at examination.

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Summary of Comment	Council response
The NHS support the EAP Update and welcome inclusion of previous NHS comments	Support welcomed
The London Property Alliance strongly support the ambition of the EAP to deliver a coordinated, high-quality regeneration of Euston as a major transport, commercial and employment hub of national importance.	Support welcomed.
The London Property Alliance consider it is essential that aspects of the draft Plan do not undermine development viability and investor confidence as further policy details progress. They urge consideration to be given to the levels of planning obligations and encourage a flexible policy framework that is commercially realistic and supportive of investment.	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 and changing circumstances over the lifetime of the Plan. Camden's planning policies include an element of flexibility where appropriate, in order to take into account viability and other constraints that affect the ability of development to meet policy targets. Camden uses planning obligations where appropriate to mitigate the negative impacts of development which would otherwise not be acceptable. When assessing the scope of planning obligations the Council will also take into account the range of other benefits provided by a particular development and financial viability issues.
Camden Civic Society consider that the EAP has been written to enable HS2 to proceed despite lack of funding.	The Government confirmed in October 2024 that HS2 would terminate at Euston which is reflected in the EAP Update. Government financing decisions are outside of the EAP Update.
Camden Civic Society commented that the Plan does not provide for wellbeing of citizens and existing communities and businesses.	The first objective of the EAP is prioritising local people's needs to ensure that new development meets local needs by providing new homes, jobs, businesses, community spaces and open spaces. Health and wellbeing is a priority of the EAP and seeks to ensure that all aspects of development promote health and wellbeing. A Health Impact Assessment (HIA) assessed the potential health impacts of the Plan and found that overall, the updated Euston Area Plan has a positive impact on improving health and reducing inequalities, particularly the inclusion of Health and Wellbeing as a key strategic principle.

Introduction (chapter 1)

- 2.12 This section provides a summary of comments made with regard to the introduction of the EAP. The Introduction chapter of the EAP Update provides detail on the plan context, vision and objectives, purpose of the plan, material weight, evidence that has supported the plan and consultation that took place. No specific comments were received on the introduction.

Context (chapter 2)

- 2.13 The context section of the EAP provides a brief assessment of Euston's character areas, the London-wide and local context and key issues that are faced in the Plan area.

There were no specific comments in the consultation made on this section of the EAP.

Overall Strategy (chapter 3.1) and Strategic Principle EAP1 (chapter 3.2)

- 2.14 The overall strategy provides an overarching spatial concept and presumption in favour of sustainable development. Principle EAP1 provides policy and guidance for key land uses across the area: including homes, economy and employment, retail and leisure, social infrastructure and meanwhile uses, recognising the importance of Health and Well-being; Safety and Security and securing Inclusive Growth and delivering Social Value as cross-cutting themes.
- 2.15 Approximately 13 comments were received in relation to the Landuse Strategy and these were received from:
- GLA
 - Shurgard
 - Lendlease/ Landowners Representatives
 - Sport England

Summary of Comment	Council response
The GLA support to changes to EAP1 Part A Overall Mix which 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	Support for welcomed.

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Summary of Comment	Council response
wider policies in the EAP, Camden's Local Plan, and the London Plan, noting that these updates remove the reference to exceeding targets (comments provided as part of Regulation 18 response) and provide helpful clarity about priority land uses should new areas for development be identified through design refinement of the station.	
The GLA welcome the specific reference to affordable housing that has been added to Objective 1 (Prioritising local people's needs).	Support welcomed
The GLA welcome the reference to optimising the potential of sites to deliver additional homes.	Support welcomed
The GLA welcome 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
Explicit recognition of the potential role for Euston at night is welcomed by the GLA..	Support welcomed
Shurgard consider that principle EAP1 should be amended to better reflect a range of employment uses, with uses complementary to the Knowledge Quarter encouraged.	The supporting text of EAP1 includes a range of mixed uses and therefore does not exclude non-knowledge-based uses. The Land use strategy says <i>“New development above and around Euston Station should optimise the potential to create a major new economic hub of new commercial, knowledge based, science and creative sector industries to reflect the Knowledge Quarter ambitions for the area. The wider plan area will provide a range of mixed uses including a significant amount of residential, particularly to the north of the station reflecting its transitional role between settled areas to the north of Camden and the mix of uses in Central London.”</i>

Summary of Comment	Council response
Sport England have given their support in relation to facilitating/improving active travel infrastructure, creating and improving public realm, improving connections, creating 'green streets', considering 'Healthy Streets' and others.	Support welcomed.
Sport England recommend that the Council seek to improve the health and wellbeing of the area by having clear references to Active Design, its Principles and the Active Design Checklist within the Area Plan. Active Design principles and the checklist, for example, could be added to the design requirements for sites/land allocations or an embedded throughout the document so that activity would be 'designed in' to the area.	The supporting text of Local Plan policy D1 specifies that when designing development proposals, developers are expected to have regard to policies and design guidance including Sport England's Active Design guidance, it is not considered necessary to repeat this in the EAP Update or for specific site allocations as it will apply to all. Health and well-being is identified as an important cross-cutting theme of the EAP Update, with Strategic Principle EAP 1 – Land Use Strategy highlighting that the creation of healthy environments will be a key consideration when assessing planning applications. Supporting text of EAP1 seeks to ensure that applicants demonstrate how they have considered health and wellbeing at an early stage, providing for a healthy environment, active travel, open space, fitness opportunities, safety and security, animated street life, connectivity and accessibility across Euston. Promoting sustainable and active travel is one of the 9 overarching objectives of the EAP. This is an important cross-cutting theme and is highlighted in Strategic Principle EAP 2: Design. The key urban design principles seek to engender improved connectivity and permeability and provide healthier and more sustainable travel options. They seek an integrated network of open and green spaces and routes, encouraging active travel. This is also a key tenant of Strategic Principle EAP 3: Transport.
Sport England made the following comments: Existing sports facilities may not be adequate to meet demand from new development and could worsen current or future deficits.	Local Plan policies seek to protect existing and secure the provision of new and enhanced open space, play and sports facilities (Policies SC3 (Social and Community infrastructure) and SC4 (Open Space) and these policies apply in the Euston area.

Summary of Comment	Council response
• New development should help meet the demand it creates through on-site sports provision and/or funding additional off-site capacity. • Sports provision should be guided by an up-to-date evidence base, including a Playing Pitch Strategy and Built Facilities Strategy, although it is unclear whether these are currently in place. • It is unclear whether proposed site allocations or other development would result in the loss of existing sports and recreation facilities. • Any sports facilities lost to development should be replaced in advance to maintain community access to sport and physical activity. • Permanent loss of sports facilities may conflict with national planning policy unless it can be clearly demonstrated that they are surplus to current and future needs.	The EAP recognises that the introduction of new housing may generate the need for new and enhanced open space and sports/play provision. A report produced by Knight Kavanagh & Page for the Council in 2022 undertook a supply and demand needs assessment of sports facilities considering the current and future demographic of Euston and the HS2 development area. The Council has also recently completed further work to establish in more detail what community infrastructure could be needed to support growth, including sports facilities delivery of which can be supported through policies in the development plan.
Lendlease and the Landowner Representatives welcome the changes incorporated, better enabling the need for flexibility regarding expectations for land uses across the Plan area.	Support welcomed
Lendlease and the Euston landowners, commented that: • The Council commissioned discreet viability work for the Euston area in the knowledge that the Local Plan viability work was not able to appropriately test the extraordinary costs associated with the sites associated with the station and in turn it is not unexpected that once this assessment has been concluded that it supports a different policy approach to the Local Plan. • references to the emerging Local Plan as determining the level of affordable housing and affordable workspace must be removed.	The EAP update must be in general conformity with the London Plan 2021. Consequently, the Local Plan supports the strategic target of 50% set out in London Plan Policy H4, but this must be considered alongside the threshold approach to applications set out in London Plan Policy H5. The threshold approach is included in the Local Plan in Policy H4 part B.5 and explained in paragraphs 7.119 7.120. The 35% threshold will apply to most larger developments involving housing that come forward in Camden and more recently, emergency measures will apply on a temporary basis. At the time of writing there was no sufficiently robust evidence to justify a departure from this. The Viability Assessment for the Local Plan tests the ability of developments across the borough (including within the Euston Area) to accommodate the policies in the draft Local Plan alongside

Summary of Comment	Council response
	prevailing rates of CIL. The viability assessment work for the EAP concentrates on the station and tracks area and the 'Cutting' (areas where development sites are affected by extraordinary costs associated with developing over railway infrastructure). The Local Plan viability work focuses on the assessment of the viability of the non-railway sites. It is recognised that the exceptional costs associated with development on and above the station and rail tracks present viability challenges. The uncertainty that surrounds the approach to the Euston station redevelopment and masterplanning, including a lack of confirmed station design, costs and enabling works means that there is insufficient evidence to support a bespoke approach to policies on affordable housing and affordable workspace which would effectively be a departure from the London Plan. It is considered that the existing policies contain enough flexibility to account for variances in viability and this is reflected in the Local Plan and the EAP Update, The EAP evidence base reflects the best information available at the time of writing. Given the prolonged nature of the scheme and the uncertainty around designs and costs, the viability information is consequently limited at this stage. The Council worked closely with land owners to establish inputs into the work in line with national guidance and both parties recognised the limitations of the available information. Coupled with the flexibility in the existing London and Local Plan policies and the recognition that the viability could change over the 25+ years of the EAP Update, it is considered appropriate to seek affordable housing and affordable workspace in line with Local Plan and London Plan policies. Proposed modifications discussed as part of the examination of the Local Plan and in response to the Reg 19 consultation on the EAP Update provide extra clarity on this and highlight the particular challenges with the Euston masterplan area.

Summary of Comment	Council response
	The existing and emerging policy framework allows for consideration of viability at the planning application stage where more detailed information should be known.

Design Strategy (chapter 3.3)

2.16 The Design Strategy provides overarching design, heritage and public realm principles, policy and illustrative masterplan. Strategic Principle EAP2: Design seeks to ensure that development and change should *“create an integrated, well-connected and vibrant place of the highest urban design quality, which builds on existing local character and heritage and provides an attractive and legible environment for local people, workers, visitors and passengers.”*

2.17 25 comments were received in relation to the design strategy from the following organisations and individuals and summarised below:

- Community Campaigner
- GLA
- Historic England
- Landowners Representatives
- London Property Alliance
- Local residents
- Regents Park Conservation Area Advisory Committee
- St Paul's Cathedral
- Transport for London

Summary of comment	Council response
A response received from a Community Campaigner considers the Plan sound on the condition that Traditional Architecture is integrated	The Local Plan expects development to respond positively and sensitively to local context and character and preserve or enhance the historic environment and heritage assets. With regard to Euston station designs the EAP sets out at "Whilst it is important that the architecture conveys through scale and architectural language that this is a significant transport interchange, the design

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Summary of comment	Council response
	needs to be driven by the changing and emerging context as well as responsive to the specific heritage of this central London neighbourhood."
HS2 currently has no revised station scheme design, so there is no legitimate basis for assuming the former tube station entrance on Drummond Street must be demolished. The EAP should recognise and appraise it as an existing historic asset rather than treat its removal as a given.	The former tube station is highlighted as making a positive contribution in the Historic Area assessment completed as part of the original evidence base for the EAP. The background report which summarises key points of evidence for the production of the EAP highlights that the Council considers that this, alongside the Community led Historic area assessment are still valid, with updates highlighted as part of the background report. However, as the site is within the limits of the HS2 Act and its loss was assessed as part of the Environmental statement for HS2, the Council does not have any powers to require its retention.
If there is a design for HS2 station then the EAP needs to publish this.	There are no confirmed Euston station designs. There is a commitment to joint working by the delivery organisations to try to achieve the best solution for Euston.
The GLA welcomes the updates to Design Strategy that clarify how tall buildings should be designed and make appropriate reference to the Local Plan's definition of tall buildings. This satisfies the London Plan policy D9 requirements.	Support welcomed
The GLA commented at Reg 18 that all protected views should be referenced in the EAP have been reflected in the EAP	Support welcomed
Lendlease and the Euston Landowner Representatives welcome the wording updates to align with NPPF and London Plan policy expectations, and the wording changes regarding approach to building heights/massing/scale, which makes clear the indicative nature of heights stated within the EAP Update.	Support welcomed

Summary of comment	Council response
The Regents Park Conservation Area Advisory Committee comment that the Design Strategy suggests that excellent design and careful modelling could mitigate the harm to the view looking south east from the Broadwalk of Regents Park which includes St Katharine's Danish Church. View 20 suggests that it is the massing and height of the taller building that damages the historic views and the EAP seems to rely on unfounded assertion rather than evidence.	View 20 is of Regent's Park and it is noted that the spires of St. Katharine's Danish Church, a Grade II* listed building, are an important part of this view. The local views assessment in the Background Report identified that the tested massing included tall building on Regents Park Estate (EA10) and on the Maria Fidelis site (EA9) which would appear beside and behind the Church. Proposed modifications are suggested to both these site allocations to clarify that adverse impacts on the setting and significance of St Katharine's Church in views from Regent's Park, should be avoided and/or mitigated in line with national policy. The Council considers that it can demonstrate a well-reasoned and robust rationale and is preparing a topic paper on this issue to support the Plan at examination.
The Regents Park Conservation Area Advisory Committee consider that a mechanism is needed in the EAP to take account of potential changes to the LVMF	The London Plan is part of the Council's Development Plan and as such the Council will need to consider the relevant policies at the point of determination which will allow for consideration of any updates to the LVMF. Should the LVMF be updated before or during the plan examination, Camden will have the opportunity to discuss whether any potential modifications would be necessary / helpful with the planning inspector.
St Paul's Cathedral consider that there is the potential for adverse qualitative impacts on views even when planes are not specifically breached by tall buildings. This needs further investigation.	The EAP sets out potential general building heights and locations that may be suitable for tall buildings while noting that precise locations and heights for tall buildings will be the subject of a full and proper testing process through detailed masterplanning work and an assessment of impact in line with London Plan policy, site constraints and other factors including legibility, sunlight and daylight. This allows for more detailed assessment at the planning application stage. The Council considers that it can demonstrate a well-reasoned and proportionate evidence base and is preparing a topic paper on this issue to support the Plan at examination.

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Summary of comment	Council response
St Paul's Cathedral would like reassurance that the lower bracket for capacity represents the upmost limit of the development that would be permitted by the policy.	Following discussions with Historic England, modifications are proposed which highlight particularly sensitive views. The ranges included in the policies and site allocations of the EAP Update are informed by the capacity modelling and do not always match the upper development tested – the indicative capacity and heights in the policies are considered deliverable and are based on massing envelopes and a potential layout in order to inform potential capacities. Specific development proposals could have different layouts and especially in relation to the station masterplan area will be dependent on where land is enabled for development. As such, the EAP recognises that further detailed design and testing will be required for actual development proposals and provides guidance to highlight specific sensitivities. The EAP sets out potential general building heights and locations that may be suitable for tall buildings while noting that precise locations and heights for tall buildings will be the subject of a full and proper testing process through detailed masterplanning work and an assessment of impact in line with London Plan policy, site constraints and other factors including legibility, sunlight and daylight. The upper limit for development capacity in a future application will be determined by an assessment against all the relevant policies in the Development Plan including London Plan policies D9 (Tall buildings), HC4 (LVMF) and HC1 (Heritage conservation and growth); Local Plan policies D1 (Design), D2 (Heritage) and A1 (Managing the impact of development); as well as the strategic and area based policies and site allocations in the EAP 2026 Update.
Suggestion that there needs to be justification for the plan as it could be undermined as modelling is only based upon capacity; no other urban design, streetscape or environmental considerations have influenced the modelling. The plan policies are not underpinned by specific heritage assessment that includes St Paul's Cathedral.	In accordance with London Plan Policy D1 (London's form, character and capacity for growth), the EAP Update has been prepared to meet borough growth requirements including housing targets following a design led approach to establish optimised site capacity for site allocations. The capacity modelling included the consideration of a number of design options to determine the most appropriate form of development that responded to a site's context and capacity for growth taking into account a range of factors including local

Summary of comment	Council response
	context, the LVMF, heritage assets, townscape, neighbouring amenity, open space and viability. The testing of development capacity massing envelopes in relation to St Paul's Cathedral included an assessment of the impact on views of this heritage asset using the detailed guidance in the London View Management Framework SPG which sets out important characteristics of the view which should be preserved and enhanced. The assessment by its nature took account of the wider setting of St Pauls Cathedral. The LVMF is considered to provide the most appropriate guide to maintaining the significance of this heritage asset in its wider setting at this stage in the process. The Council considers that it can demonstrate a well-reasoned and proportionate evidence base and is preparing a topic paper on this issue to support the Plan at examination.
Historic England consider that there is a lack of detailed baseline assessment of views to strategically important landmarks within evidence base. An 'initial, high-level' appraisal of visual impact in Appendix 3 but this does not provide a great deal of qualitative assessment to fully understand impacts. Want to clarify the status and accuracy of the modelling within Appendix 3 of the background report. Techniques such as 'shadowing' do not mean the visual impact is always nil. The quality of the views in the evidence base means that it is hard to discern impacts.	The Council considers that the approach is sound in the context of the National Planning Policy Framework (NPPF) and appropriate for the stage in development. The exact effect of development on heritage assets will be dependent on the details of future planning applications on this site. Following discussion with Historic England modifications are proposed which provide greater clarity in relation to NPPF, London and Local Plan policies. The Council considers that it can demonstrate a well reasoned and proportionate evidence base and is preparing a topic paper on this issue to support the Plan at examination.
There should be an expert analysis to specifically define opportunities to enhance or repair detriments to views and make them policy would be desirable, and lead to the plan being truly positively prepared.	Opportunities to enhance or repair detriments to views has been taken into account using the detailed guidance for the LVMF. For example, paragraph 129 of the LVMF includes the following: "The cluster of tall buildings in the city of London is partially obscured by towers at Euston. St Paul's cathedral is framed by two of these towers but a third, lower tower, reduces the viewer's appreciation of the dome and drum". The lower tower referred to is '1 Euston

Summary of comment	Council response
	Square' which has been demolished as part of the HS2 works. The EAP Update emphasizes that redevelopment with taller buildings in this area "would need to be carefully sited to avoid harm and should seek to make a positive contribution to the strategic viewing corridors and local views should be preserved".
Concerns that height guidance is overly restrictive or insufficiently responsive to site context. Given the Euston Area's location and function as a major transport hub, we consider it reasonable for height thresholds to be defined by the masterplan boundary rather than the CAZ boundary	The EAP is consistent and in line with the policy on Tall Buildings set out in the Local Plan (Policy D2) and defines tall buildings as buildings that are over 40 metres in height in the CAZ. This is as set out in Part A of the London Plan tall buildings policy. The indicative heights included in the relevant site allocations provide guidance for future heights derived from a number of factors, the tall building definition sets the height for what is considered a tall building – the two are connected but not the same. It is not considered appropriate to define tall buildings by the masterplan boundary rather than the CAZ boundary.
Historic England are concerned that individual significance of heritage assets has not played a sufficient role in determining height ranges specified in the Plan.	Various supporting documents provide a robust evidence base considering the historic environment in the Euston area. In addition, relevant conservation area appraisal and management strategies and the London View Management Framework were taken into account when preparing the EAP Update and when testing and updating the site capacity for the Euston Station masterplan area and for previously identified sites as well as additional sites identified through the call for sites. The Council considers that it can demonstrate a well reasoned and proportionate evidence base and is preparing a topic paper on this issue to support the Plan at examination.
LVMF View 4A1 Primrose Hill to St Paul's: protrusion of proposed building line above the LVMF threshold (in both lower and upper ranges) including within the protected vista. Together with the taller buildings at either side (potentially creating a closer 'canyonising' effect), we consider that this would be harmful and should be given further consideration.	The taller buildings either side of this view are massing envelopes for development above the Network Rail parcel deck and taller buildings in location A and B and in site allocation EA6 (Regents Park Estate). They have been drawn to test the impact of the envelopes in order to understand potential capacity. While there is an identified potential impact from the upper range, further detailed design and testing will be required for future development proposals to establish an appropriate height and to ensure that tall buildings in these locations sit better in their context. Policies in the development plan seek to minimise/ mitigate these. The Council is preparing a topic paper on this issue to support the Plan at examination.

Summary of comment	Council response
	Following discussion with Historic England modifications are proposed which provide greater clarity in relation to NPPF, London and Local Plan policies and highlighting particularly sensitive views
LVMF 5A2 Greenwich to St Paul's: Harm created by 1 Euston Square has been removed by its demolition, the opportunity for new development this creates should seek to reinforce the enhancements that have already been secured. Capacity modelling: development would wrap around behind the drum of the Cathedral, while the buildings to right add to the cumulative harm within the view. We consider that a different approach to development that redistributes the massing of new buildings in such a way that harm to significance is avoided is necessary here.	We have discussed with the GLA, development potential for a tall building at the south-west corner of the station (indicative appropriate height 55 metres above ground level / 79m AOD) on the site of the now demolished One Euston Square. The massing envelopes of the taller buildings in this view are an improvement on the previous view which included One Euston Square and the approach of identifying this location as appropriate for a taller building and seeking an improvement to this view has been discussed with the GLA. Notwithstanding this, modifications to site allocation EA1 are proposed which include specific reference to design guidance to include breaks in massing in order to better integrate with the townscape in the background view. Proposed change to highlight need for design and heights to be suitably varied to avoid harm to View 4A.1.
View 20 – Regent's Park towards St Katharine's Church (GII*): Lower / upper ranges of capacity testing demonstrate effects on the Church. Tall buildings, particularly site allocations EA9 (Maria Fidelis) and EA10 (RPE North), would appear in the view and potentially create harm to the significance of the Church. The relevant site allocation policies require clear requirements to avoid such harm.	It is agreed that the site allocation could benefit from further detail for clarity - modifications to site allocation EA9 and EA10 are proposed which highlight specific guidance with reference to NPPF, London and local plan policies which require harm to be avoided and/ or mitigated.
Views 23 and 24 – towards Chester Terrace: Tall buildings in location B and site allocation EA2 (Royal Mail) would create harm to the grade I listed Chester Terrace and to the views from grade I Regent's Park. Existing Brill Place tower harms these views, and any further effects on	Following discussion with Historic England modifications are proposed which provide greater clarity in relation to NPPF, London and Local Plan policies.

Summary of comment	Council response
Nash's designed views should be avoided. The modelling clearly demonstrates these effects, and further amendments are necessary to relevant site allocation policies to make clear the sensitivities around potential effects.	
Concerned with the evidence and assessment that underpins the approach to the site allocations as well as the specific effects of some site allocations. The modelling for some views shows site allocation massing both within the wider setting consultation areas and in the viewing corridor. This is contrary to Strategic Principle EAP2 Design re protected vistas and should be clarified. The effects of some draft site allocations have not been fully understood at this stage and further work is necessary to appropriately inform the site allocation policies	Proposed heights are indicative and the need for further work and modelling is highlighted. Precise locations and heights for tall buildings will be the subject of a full and proper testing process through detailed masterplanning work and an assessment of impact in line with London Plan policy, site constraints and other factors including legibility, sunlight and daylight. Modifications proposed to provide clarity.
The GLA consider that wording could be added to Strategic Principle EAP 2- p73 on women and girls	Propose modification

Transport Strategy (chapter 3.4)

- 2.18 Strategic Principle EAP3 provides key transport priorities and an overarching transport policy. Euston station redevelopment will provide a new station and transport interchange and improve infrastructure in and around Euston
- 2.19 Approximately 15 comments were received in relation to the transport strategy from the following organisations and individuals:
- GLA/Transport for London
 - Local residents

These are summarised below:

Summary of comment	Council response
PHVs are not catered for. Only taxi pick ups	The EAP seeks to manage private hire vehicle (PHV) movements through an exclusion zone and / or a limited 'drop-off facility, ideally within the station site, designed in alignment with Camden's Road User Hierarchy set out in the Camden Transport Strategy. Specific arrangements for PHVs will be managed through further station design process.
The GLA/TfL give broad support of transport policies set out in the EAP	Support welcomed
TfL consider that changes needed to illustrations to reflect how bus station is referenced	"Bus facilities" is considered to be a suitable term to cover all options including a bus station
Drawings are showing E-W and N-S walking connections and HS2 entrances- the delivery is not feasible and it should be made clearer these are long term aspirations.	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): 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 could be delivered alongside the long-term development opportunity of the Network Rail parcel deck. Propose modification.
"One-way" linear bus facility should be removed.	LBC support a one-way linear arrangement and have responded to the specific references
A reference should be 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.	Agree that wording should be added that major applications should be accompanied by a detailed Transport Assessment, supported by the relevant, up to date transport modelling. Suggest change to adding wording about Transport Assessment
Wording needs changing on page 80 as sets out an expectation that cycle segregation is being explored.	Agree that text is not definitive about cycle segregation.

Summary of comment	Council response
	Suggest change to make clearer that upgrades to Euston Road, Hampstead Road and Eversholt should be subject to impacts on TLRN/ modelling.
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 EAP Update reflects the road user hierarchy from the Camden Transport Strategy. This prioritises the most vulnerable road users with pedestrians and cyclists at the top. This is the same hierarchy as Manual for Streets and the Highway Code. It is important that the safety of the most vulnerable road users is protected and be considered when designing transport interchanges, like the bus facilities at Euston Station. No change proposed.
Wording needs updating regarding poor road safety record.	Modification proposed which updates the context in relation to road safety.
Wording needs revisions regarding improvements will be needed to Gordon Street as it is a pedestrian desire line and is all dependent on when new underground link between Euston and Euston Square LU stations are delivered	Modification proposed.
EAP needs wording to ensure that any shared mobility measures are provided that won't conflict with pedestrian users.	Modification proposed
Need to reference the transport infrastructure requirements and what transport improvements contributions might be required towards.	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 social infrastructure. Modification proposed
References are required regarding and the inner ring road and function as a strategic freight corridor	Modification proposed
Acknowledgement should be made if 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	Modification proposed to provide clarity

Summary of comment	Council response
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.	
Concern about using out of date TfL modelling	The main Transport Study for Euston was initially drafted in 2022, and subsequently updated in 2025, following government announcements in relation to Euston. The 2025 addendum considers that current modelling outputs still form the most appropriate basis on which to inform further transport updates to the EAP

Environment Strategy (chapter 3.5)

- 2.20 Strategic Principle EAP4 provides principles to improve the environmental quality of the area and deliver sustainable development to help address the climate emergency.
- 2.21 Approximately four comments were received in relation to the environment strategy from the following organisations and individuals:
- Camden Swifts Group
 - Environment Agency
 - GLA/Transport for London
 - Thames Water

These are summarised below with the Council response added:

Comment	Council response
There are no major environmental constraints in EAP area but need to take a precautionary approach to land contamination and note that land contamination is not mentioned in the EAP. Note that planning applications should groundwater protection is taken into consideration for any sites coming forward with sites that will have deep piled	The Local Plan submission draft highlights that developers should follow the risk management framework provided in the Environment Agency's guidance to help identify and manage the risks of land contamination. Local Plan policies apply to development sites in the EAP and the NPPF paragraph 16 notes that plans should avoid unnecessary duplication of policies that apply to a particular area.

Comment	Council response
foundations, boreholes, or infiltration SuDS paying particular interest .	Proposed modification to Euston Station EA1 site allocation.
The GLA/TfL request new text regarding ULEZ expansion in 2023 about the number of polluting vehicles and levels of harmful air pollution that Londoners are exposed to	Agree to add new wording. Suggest insertion about ULEZ expansion
Consider that the Plan is unsound as swift bricks (nest boxes) should be added into chapter 3.5 to comply with NPPF	It is not considered necessary to add references to swift bricks to the EAP. The Local Plan (policy NE2) expects suitable developments to integrate measures to support wildlife, including swift bricks, bat/bird boxes, bee bricks and permeable fencing. The EAP requires an enhanced green infrastructure network and net enhancement of biodiversity. All proposals for development will be considered against the policies in the Camden Local Plan and Euston Area Plan. The Plan-making section 3 of the NPPF sets out that plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area therefore it is not considered appropriate to add references to swift bricks in the updated EAP.
Thames Water support the content of EAP4 re water and sewerage infrastructure	Support welcomed

Open Space Strategy (chapter 3.6)

- 2.22 Strategic Principle EAP5 seeks to secure a network of open space and green infrastructure. The policy supports the provision of new open spaces and enhancements to existing spaces that make them safer and more accessible, meeting demand from new development and improving the character of the area.
- 2.23 Approximately eight comments were received from the following organisations:
- Ampthill Square Tenants and Residents Association
 - HS2
 - Somers Town Neighbourhood Forum
 - Woodland Trust

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A summary of the responses received with Council response are below.

Summary of comment	Council response
The Woodland Trust support and recognition that Strategic Principle EAP 5: Open Space and Green Infrastructure is in line with the Camden Tree Planting Strategy, and the NPPF	Support welcomed
HS2 consider that the plan is unsound due to Open Space Strategy not being justified. The text goes beyond the legal obligations of HS2. Would like to see changes to text in relation to Camden's understanding of the minimum provision of open space, stating that the undertaking is not for a particular amount and refer to it as a 'non-binding statement of intent'. HS2 consider that modifications should be made to accurately reflect the scope and limitations of Secretary of States Assurance number 1137	The Council has included its understanding of the amount of open space which should be reprovided with reference to what was shown in the HS2 environmental statement at the time that assurances were accepted. The Council considers that it can demonstrate a well reasoned and proportionate evidence base and is preparing a topic paper on this issue to support the Plan at examination. Modifications to provide clarity on the issue are being considered but not yet proposed.
Somers Town Neighbourhood Forum support that the EAP has consistently prioritised replacement and new open spaces for the community, and acknowledges the unprecedented loss of open space in the area due to HS2.	Support welcomed
Somers Town Neighbourhood Forum consider that all existing housing and the vast majority of future housing is outside the “area above and around the station”. The EAP needs to understand the existing open space needs within our estates, and the additional need for open space required by a substantial number of new homes within our estates is vital. Additional public open space and play space attached to new development cannot be replaced by green infrastructure	The Euston Open Space study assesses all of the open space in the Euston area plus a buffer. The background report seeks to address any changes to the spaces since the time of writing and notes the shortage of spaces. The EAP states that open space will be sought in line with policies in the Local Plan. Replacement of open space lost to the HS2 scheme is governed by the HS2 Act.
The Public Open Space and Infrastructure Strategy should cover the entire EAP area (or a separate and complementary	EAP5B states that “In order to ensure that public open space is planned as a fundamental basis of the masterplan for the area above and around the

Summary of comment	Council response
strategy needs to address open space outside the station area).	station, an application for development must include a Public Open Space and Green Infrastructure Strategy and Management Plan". The aim of this strategy is to address the complex ownership arrangements of the station area. Modifications are proposed to EAP5B to highlight links o the spaces in the wider plan area.
Each site allocation should stipulate the quantum and quality of new open space required	The Local Plan has its own open space standards which include for 11 or more additional dwellings or over 1000sqm of floorspace, 9sqm per occupier of public open space should be provided. Modifications are proposed to EAP5 to highlight links to local plan policies and reference o the open space study, noting identified shortfalls.
The Open Spaces Study.is considered to be out of date.	The Euston Open Space Study was commissioned by Camden for the Euston Area Plan and the final report produced by LUC in 2023. This is considered a robust and proportionate evidence base. The report recognises that several open spaces have been lost as a result of works undertaken by HS2. The Camden borough wide study was carried out in 2014. Changes to open spaces since completion of the study are highlighted n the background report.

Euston station and Tracks (chapter 4.1)

- 2.24 Development Principle EAP1 Euston Station and Tracks seeks to ensure that a comprehensive approach to development at Euston Station and the front piazza will be required to help transform the image of Euston, through facilitating new and improved links, the creation of public spaces and new development. The chapter includes site allocations Euston Station and Tracks (EA1) and Royal Mail (EA2) site.
- 2.25 Approximately four comments were received in relation to Euston station. These were received from the following respondents and summarised with Council response below.
- Bloomsbury Conservation Area Advisory Committee
 - Landowner Representatives
 - Local resident

- St Paul's Cathedral

Summary of comment	Council response
Support the wording changes to remove maximum caps for homes, plus the supporting text regarding capacity that builds in flexibility by referencing wider considerations as part of complex station redevelopment.	Support welcomed
Lendlease and the Landowners Representatives suggest that bespoke affordable housing and workspace policies are needed for Development Principle EAP1 'Euston Station and Tracks' and the Site Allocation for the 'Euston Station and Tracks' (EA1) suggesting that this is supported by the EAP viability assessment	The EAP evidence base reflects the best information available at the time of writing. It is clear that given the prolonged nature of the scheme and the uncertainty around designs and costs, the viability information is consequently limited at this stage and viability will need to be considered in the future when more accurate information is available. The Council worked closely with landowners to establish inputs into the work in line with national guidance and both parties recognised the limitations of the available information. Coupled with the flexibility in the existing and emerging London and Local Plan policies and the recognition that the viability could change over the 25+ years of the EAP Update, it is considered appropriate to seek affordable housing and affordable workspace in line with Local Plan and London Plan policies. Proposed modifications discussed as part of the examination of the Local Plan and in response to the Reg 19 consultation on the EAP Update provide extra clarity on this and highlight the particular challenges with the Euston masterplan area. The existing policy framework, provided by the Local and London Plans includes sufficient flexibility to account for variances in viability and bespoke policies for affordable housing and workspace are not necessary in the EAP, nor are they justifiable given the level of information available at this stage.
The depiction of this area of future station within the EAP Update as "HS2 station" with the same symbology as the HS2 station to be built before 2051 is incorrect and confusing. It	The funding and design of the station is still uncertain. The illustrative masterplans seek to demonstrate how the policies in the Plan could be interpreted to deliver the objectives of the EAP Update. Detailed designs will be developed and iterate as part of the planning process and should respond to

Summary of comment	Council response
needs to have a separate and distinct symbology. What happens to the area in the meantime?	the policies in the EAP Update. The supporting text on pg. 126 notes that development will happen in phases and notes that an area may be future-proofed for future station expansion, this could include underground platforms, with development blocks above. Phasing and delivery is still being developed and the Plan includes the best information available. Propose modification to add wording to make this clearer in the illustrative masterplan.
There is no justification for the demolition of the historic Drummond Street Underground station building as there is no design for HS2 currently. There is no detail of the historic station in the EAP.	The former tube station is highlighted as a positive contributor in the Historic Area assessment, is also identified in the 'Community led Heritage Assessment'. The background report which summarises key points of evidence for the production of the EAP highlights that the Council considers that this, alongside the Community led Historic area assessment are still valid, with updates highlighted as part of the background report. However, as the site is within the limits of the HS2 Act and its loss was assessed as part of the Environmental statement for HS2, the Council does not have powers to require its retention and have been informed by HS2 Ltd. that its demolition is necessary for the HS2 works.

Euston Road (chapter 4.2)

- 2.26 Development Principle EAP2 Euston Road seeks to transform Euston Road to provide a safer, more pleasant and inclusive street environment drawing on the design principles from the Euston Healthy Streets project. The chapter includes three site allocations; The Place and Premier Inn (EA3), 250 Euston Road (EA4) and Euston Square Hotel (EA5).
- 2.27 In response to this chapter, there have been approximately 283 comments received from:
- Ampthill Square Tenants and Residents Association
 - Bloomsbury Conservation Area Advisory Committee
 - Climate Emergency Camden
 - Hodge Jones and Allen Solicitors
 - Derwent
 - Drummond Street Tenants and Residents Association

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- Local residents
- Plentiful Foods Indian Spice Shop Drummond Street
- Premier Inn
- Tolmers Village Forum

A summary of these responses can be found below:

Summary of comment	Council response
The size, design and setting of Euston Square Gardens (important part of the Bloomsbury CA) should not be compromised in any way i.e. in size, that the gardens are not eroded in their total area (irrespective of proposed internal design changes), in design, that any redesign is classical in form (as distinct from the more modern design we were presented with at an earlier meeting which we consider inappropriate), and in setting, that the setting is not compromised in any way by encroachment by buildings, particularly of course anything high rise.	Development Principle EAP2 (Euston Road) seeks to ensure that parts of the historic design of Euston Square Gardens and its heritage assets will be restored. Page 150 of the EAP highlights that Euston Square Gardens should be improved to provide an enhanced entrance to the station to reinforce the role of the gardens as an important green space and recognise its status as an historic London square. Proposals for the Gardens should be informed by a detailed study of their historic significance, including the original layout and the extent of remaining original fabric (for example, historic railings). The findings of the study should then provide the basis for design proposals (whether for improvements or replacement), along with wider design, public realm and accessibility considerations, to enhance the Square's historic significance whilst meeting the EAP objectives.
Site allocation EA3: The Place and Premier Inn Object to policy wording that implies or promotes comprehensive redevelopment across multiple adjoining ownerships as a prerequisite or expectation for development. For the allocation to be effective, justified and deliverable, it must support standalone, plot-based redevelopment proposals. No realistic short- or medium-term prospect of comprehensive land assembly. Contrary to NPPF which requires site allocations be deliverable and effective. Height and massing strategy should not be contingent on comprehensive redevelopment across the wider allocation.	The wording in the EAP encourage the comprehensive development of the site. Given the potential benefits of a comprehensive approach it will be important to demonstrate that such an approach has been explored and where this is not possible this is clearly explained, including, where appropriate ensuring that development does not prohibit future development from coming forward. Both landowners are interested in developing their sites. The site allocation is effective as development is considered to be deliverable in the medium term (i.e. before 2041). The Site Allocation does not state that height and massing is contingent on a comprehensive development proposal. However, it is the Council's view that the development potential of the site would be best delivered through

Summary of comment	Council response
Site allocation EA3: The Place and Premier Inn Earlier drafts of the EAP Update did not include the Premier Inn building or 40metre height guidance in Site Allocation EA3.	comprehensive rather than piecemeal development. The existing wording of the site allocation provides a degree of flexibility. Between the Regulation 18 Consultation in 2023 and Regulation 19 consultation in early 2026, officers undertook further work on the EAP Update. This involved both an assessment of development capacity and heights and discussions with landowners about the potential to develop their sites. This resulted in amendments to the site allocations with some site allocations being removed and others being added. ‘The Place’ site allocation (EA3) was expanded to include the Premier Inn site as the owners of this neighbouring site had indicated their interest in redevelopment. In the July 2024 consultation, none of the site allocations set out the potential location for taller buildings or indicative heights. For the Regulation 19 consultation, site allocations set out the potential location for taller buildings and indicative heights as well as detailed ‘Development and Design Principles’. Planning Practice Guidance advises that there is considerable flexibility open to local planning authorities in how they carry out the initial stages of local plan production, provided they comply with certain specific requirements (Paragraph: 034 Reference ID: 61-034). The Council has complied with the consultation requirements set out in Regulation 18 and the Camden’s Statement of Community Involvement.
Site allocation EA4: 250 Euston Road The Plan does not provide sufficient site-specific evidence to demonstrate that such development can be delivered without causing unacceptable harm to: daylight and sunlight to homes; character and environmental function of the square; wind turbulence; resident’s outlook, privacy and sense of enclosure; noise levels and residential amenity. There needs to be a binding amenity safeguard policy test within the EA4 allocation requiring: independent Daylight/Sunlight assessment; Privacy/overlooking safeguards and separation standards; wind microclimate	Camden’s Local Plan includes policies to try to ensure that development should not unacceptably harm the amenity of occupiers and neighbours, including in relation to noise, sunlight and daylight, overshadowing and outlook, and visual privacy and overlooking. The site allocation notes that the height and massing should be tested so as to mitigate impact on residential amenities to the north. The EAP Update and site allocations have been prepared with reference to national guidance and in line with the NPPF to establish appropriate site capacities.

Summary of comment	Council response
criteria; noise and air quality protections for residents (construction and operation); a Construction Impact Mitigation Framework.	The site allocation states that the height and massing should be tested so as to mitigate impact on residential amenities to the north. The site allocation makes clear that the acceptability of a particular tall building proposal, and its location within the site, would be assessed against relevant Development Plan policies including Tall Building policy. London Plan Policy D9 'Tall Buildings' sets out that development proposals should address visual impacts including immediate views from surrounding streets, should take account of heritage assets and their setting and should address environmental impacts (wind, daylight and sunlight) including not compromising the comfort and enjoyment of open spaces. Residential amenity will be assessed as part of the planning application. To assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent guidance BRE guidance. Site specific policy safeguards in relation to daylight and sunlight to Tolmer Square are not required in the site allocation itself as the Site Allocation is part of the Development Plan which includes policies which seek to ensure that amenity is protected by considering sunlight, daylight and overshadowing; privacy and overlooking; wind microclimate; noise; and impacts from the construction phase of development. In some cases, the Council may seek independent verification of an applicant's daylight and sunlight report. Modifications are proposed which take account of consultation responses.
Site allocation EA4: 250 Euston Road There needs to be wording added requiring a plan-led assessment of reasonable alternatives, including refurbishment/retention options and lower-rise massing options. Demolition would cause environmental harm and is at odds with Camden's climate emergency commitments – significant	Local Plan 2017 Policy CC1 requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. Likewise, Policy CC2 of the proposed submission draft Local Plan April 2025 expects developers to prioritise the retention and improvement of existing buildings over demolition. It is acknowledged that refurbishment or retrofitting is more sustainable than demolition in most cases, however, there are circumstances where better use can be made of the site. This position is reflected in the EAP site allocations as

Summary of comment	Council response
embodied carbon emissions, construction waste and pollution. The building could be refurbished.	well as the other Development Plan documents, the Local Plan and the London Plan, against which development proposals would be assessed. The site allocation development principles set out that a retrofit first approach should be assessed and that if a scheme proposes substantial or full demolition of existing buildings on this site, this would need to comply with Local Plan policies on demolition including a condition and feasibility study, and options appraisal. Local Plan 2017 Policy CC1 requires all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building. Likewise, Policy CC2 of the proposed submission draft Local Plan April 2025 expects developers to prioritise the retention and improvement of existing buildings over demolition. Change proposed to site allocation to state that the proportion of the building being demolished should be reduced as far as possible and option of refurbishment and extension is strongly encouraged.
Site allocation EA4: 250 Euston Road Site allocation EA4 is not consistent with National policy and conflicts with Local Plan with regard to urban design	The EAP Update, Local Plan and London Plan provide a policy framework for the creation of places with a high quality of life and this policy framework provides the context in which the development and design principles for individual site allocations needs to be considered. Strategic Principle EAP 2 Design of the EAP Update specifically sets out that development and change should create a place of the highest urban design quality, which builds on existing local character and heritage and provides an attractive environment for local people.
Site allocation EA4: 250 Euston Road Does not adequately address deliverability and context, including: constrained residential environment; cumulative impacts of redevelopment along Euston Road on nearby residential streets; long-term lease at 250 Euston Road extending to approximately 2039, making delivery within the plan period speculative	The Site Allocation EA4 is considered to be deliverable over the plan period. The site has been promoted by the landowner through the Council's 'call for sites' and the indicative timescales are based on the landowners response. The site is therefore considered to be available and deliverable. The lease is not a planning matter. The Site Allocation highlights the sensitivity of the constrained residential environment, stating that the height and massing should be tested so as to mitigate impact on residential amenities to the north. Additionally, policies in the

Summary of comment	Council response
	development plan seek to protect residential amenity and as such site specific policies are not considered necessary. Modifications are proposed to respond to consultation responses.
Site allocation EA4: 250 Euston Road Prolonged construction and cumulative impact concerns, including concerns about: • consequences for health and wellbeing for the local community. • health and wellbeing from construction. Children, • elderly and vulnerable individuals will be disproportionately affected. • Child safety and access routes related to construction impacts. • Structural movements to existing buildings with tube lines underneath	Supporting text to the EAP Update Design Strategy (page 66) states that the amenity of existing and future residents will form an important consideration in assessing the layout and scale of development. Policies in the Local Plan seek to ensure that residential amenity is not unacceptably impacted, including in relation to noise, air quality, sunlight and daylight, overshadowing and outlook, and visual privacy and overlooking. Health impacts during construction should be managed and minimised through a construction management plan. The Health Impact Assessment (HIA) assessed the potential health impacts of the Plan and found that overall, the updated Euston Area Plan has a positive impact on improving health and reducing inequalities, particularly the inclusion of Health and Wellbeing as a key strategic principle. On the recommendation of the HIA, the EAP was updated to more explicitly reference the health risks from construction, loss of open space, and air quality impacts during the construction phase Environmental impacts from construction would be controlled through a Construction Management Plan in accordance with Local Plan Policy A1. For major development sites, this includes: • Semi-permanent noise and vibration monitoring • a construction working group with resident's groups invited to take part. • Addressing the way in which any impacts associated with the proposed works, and any cumulative impacts of other nearby construction sites, will be mitigated and managed • Consideration of transport impacts

Summary of comment	Council response
	The impact on protected groups from the construction and operational stage of development proposals would be assessed as part of a future planning application. Major development proposals also need to provide a Health Impact Assessment (HIA) with their planning application. HIAs promote sustainable development by taking into account the cumulative impact of development, i.e. where several developments are in progress within the local area, especially where this relates to construction. Generally, the structural impacts from development are not a planning matter but may fall within the scope of the Party Wall Act or may be dealt with under private property rights. Railway infrastructure managers must be consulted on all planning applications within 10m (or zone of interest) of the railway.
Site allocation EA4: 250 Euston Road There has been insufficient consultation and engagement for this site.	Planning Practice Guidance advises that there is considerable flexibility open to local planning authorities in how they carry out the initial stages of local plan production, provided they comply with certain specific requirements (Paragraph: 034 Reference ID: 61-034). The Council considers it has complied with the consultation requirements set out in Regulation 18 and the Camden's Statement of Community Involvement. Overall, the process can be described as iterative. In the July 2024 consultation (Regulation 18), 250 Euston Road was identified as a potential site allocation following a Call for Sites. 'Development and Design Principles' were provided for 250 Euston Road (EA4) which includes a potential location for taller buildings with the provision of an indicative height as well as detailed 'Development and Design Principles'. Through the Regulation 19 consultation process, the Council has had the opportunity to take account of the concerns expressed in relation to these Site Allocations and has had the opportunity to determine whether modifications to these site allocations are required and whether the EAP Update is ready for examination having considered the representations received. Modifications are proposed.
Site allocation EA4: 250 Euston Road	Site allocation EA4 has followed a design led approach to determine the indicative site capacity which included a consideration of amenity impacts. The

Summary of comment	Council response
The tall building parameter for the site should be removed or significantly reduced. The site allocation fails to address the long term amenity impact of tall building development on residents and the local community.	assessment has identified that the corner of Euston Road and North Gower Street (within Site Allocation EA4) is a location where a potential taller building may be an appropriate form of development subject to detailed design and testing. The height and massing should be tested so as to mitigate impact on residential amenities to the north. The capacity study assumed that EA4 could accommodate a slender tower and that the daylight and sunlight impacts of such a tower would likely be limited. All applications for tall buildings will be assessed on their merits against the criteria in Local Plan Policy D1 (Design) and Policy D2 (Heritage), London Plan Policy D9 (Tall Buildings), and all other relevant policies. Policies in the Local Plan seek to protect residential amenity, including in relation to noise, sunlight and daylight, overshadowing and outlook, and visual privacy and overlooking. Modifications to reduce the indicative building height are proposed.
Site allocation EA4: 250 Euston Road The site allocation will lead to demolition of flats in Tolmers Square	There are no proposals to redevelop the residential properties of Tolmers Square. It does not fall within the red line of the site allocation EA4.
Site allocation EA4: 250 Euston Road The site allocation should be removed as insufficient evidence to demonstrate proposals are effective or justified. The site allocation has not been positively prepared.	The owners of the site responded to the Council's 'call for sites' indicating their intention to redevelop the site in the future. The site allocation allows the Council to set clear parameters for future uses alongside Development and Design Principles. Removing site allocation EA4 would not stop the landowners of these sites from coming forward with development proposals. The Council considers that the site allocation has been positively prepared and would contribute to meeting the area's objectively assessed needs and are consistent with achieving sustainable development.
Site allocation EA4: 250 Euston Road There would be a loss of trees and green space as result of demolition of 250 Euston Road.	The open space in Tolmers Square is designated in the Local Plan as a public open space and as such is protected by Policy A2 'Open Space' of the existing Local Plan 2017 and Policy SC4 of the proposed submission draft Local Plan April 2025. No detailed proposals have come forward for the site. If a planning application was submitted it would need to comply with policy NE3 in the Local Plan. Policy NE3 seeks to protect existing trees and secure additional tree

Summary of comment	Council response
	planting in the borough. Policy SC4 “will protect, enhance and improve access to Camden’s public open spaces, to promote health and well-being, enhance biodiversity and make space for nature within Camden”. In addition, Euston Area Plan policy Strategic Principle EAP5 seeks to ensure that development proposals support new open spaces and enhance existing ones as well as retaining existing trees where possible. This is to develop an enhanced green infrastructure network. Modifications are proposed to clarify that the public open space is protected.
Site allocation EA4: 250 Euston Road Support the inclusion of the site as an allocation for future mixed use development.	Support welcomed.
Site allocation EA4: 250 Euston Road 250 Euston Road site allocation should be updated to identify the potential for other forms of housing such as purpose-built student accommodation.	Permanent self-contained housing is the priority land-use of the Local Plan and site allocation EA4 reflect this.
Site allocation EA4: 250 Euston Road The site allocation would mean dislocating the existing healthcare. The draft allocation should be updated to clarify the potential for continued healthcare uses to form part of the mix of uses (clearer wording should be used).	The continued use of the site for health purposes is supported and modifications are proposed to clarify that the developer should work with the existing healthcare providers to understand their requirements and the potential for reprovision.
Site allocation EA4: 250 Euston Road High value office space and private market homes do not meet the needs of local community.	The site allocation is for mixed use including office and residential and will be required to deliver affordable housing in line with local and London Plan policies, benefiting those who are eligible for affordable housing including those who are homeless.. Enhanced workspace provision and an increase in hotel floorspace would support more jobs in the Euston area.
Site allocation EA4: 250 Euston Road	In line with Local Plan policy, the EAP highlights that all development will need to incorporate measures which support Euston as a place that is safe, secure and inclusive. This includes a robust approach to both design of development to

Summary of comment	Council response
There are concerns about the visual appearance of the area with homelessness and antisocial behaviour.	minimise future potential for anti-social behaviour (including potential displacement from the masterplan area), and in terms of the construction method, ensuring overlooking, rights of way, adequate lighting and ease of wayfinding are considered.
Site allocation EA4: 250 Euston Road There is no consideration of local people and local community.	The objective of the EAP Update is to prioritise local people's needs. The Site Allocations EA4 and EA5 would help to meet local needs by providing new homes, including affordable housing, and jobs. Development is expected to deliver economic, social and environmental benefit embedding Social Value into planning, construction and operational activities ensuring that people are part of Euston's growth. Site Allocations EA4 sets out specific infrastructure requirements for these sites and would be expected to contribute to public realm and active travel improvements on Euston Road, including those to be delivered through the Euston Healthy Streets project.
Site allocation EAP 5: Euston Square Hotel Unclear as to how the hotel can provide access to Euston Square London Underground station as it is owned by TfL	The owners of the Euston Square Hotel would need to work with TFL and London Underground to assess the feasibility and viability of providing step free access to Euston Square station.
Site allocation EAP 5: Euston Square Hotel The site allocation should be removed as insufficient evidence to demonstrate proposals are effective or justified. The site allocation has not been positively prepared.	The owners of the site responded to the Council's 'call for sites' indicating their intention to redevelop the site in the future. The site allocation allows the Council to set clear parameters for future uses alongside Development and Design Principles. Removing site allocation EA4 would not stop the landowners of these sites from coming forward with development proposals. The Council considers that the site allocation has been positively prepared and would contribute to meeting the area's objectively assessed needs and are consistent with achieving sustainable development.
Site allocation EAP 5: Euston Square Hotel There is no consideration of the local community.	The objective of the EAP Update is to prioritise local people's needs. The Site Allocation EA5 would help to meet local needs by providing new homes, including affordable housing, and jobs. Development is expected to deliver economic, social and environmental benefit embedding Social Value into planning, construction and operational activities ensuring that people are part of Euston's growth. Site Allocation EA5 sets out specific infrastructure requirements for these sites and would be expected to contribute to public realm and active

Summary of comment	Council response
	travel improvements on Euston Road, including those to be delivered through the Euston Healthy Streets project. Site allocation EA5 would be expected to investigate the provision of a new accessible entrance to Euston Square Station which does not have step free access on the north side of Euston Road. These infrastructure improvements would provide benefits to the local community.
Site allocation EAP 5: Euston Square Hotel Euston Square Hotel is a heritage asset and should be retained.	Euston Square Hotel is not a designated heritage asset. Taking into consideration the public benefit that the allocation could bring, it is considered that redevelopment of the site could offer the best use of the site.
Site allocation EAP 5: Euston Square Hotel Euston Square Hotel site footprint is too small to successfully combine a new hotel and a relatively small number of residential units.	A design led approach has been followed to determine the indicative site capacity of the site.
Site allocation EAP 5: Euston Square Hotel Viability of project as hotel: site footprint, given estimates of build cost, may not allow for adequate scale required for even a modestly profitable hotel if all the requirements in the EAP are necessary	Euston Area Plan Update policy requirements generally reflect Local Plan policy requirements in terms of the expected contribution to housing and affordable housing and public realm and active travel improvements. A viability assessment of the policies in the draft Local Plan has been undertaken. Individual policies in the EAP Update and the Local Plan include an element of flexibility where appropriate, in particular in relation to the consideration of the viability of development schemes, the feasibility of particular measures and site-specific issues.

Camden Cutting (chapter 4.3)

- 2.28 Development Principle EAP3 Camden Cutting seeks to provide 500 new homes, open space and community facilities along with improved pedestrian and cycle links transform Euston Road to provide a safer, more pleasant and inclusive street environment above parts of the railway cutting to make the most of underutilised space and reconnect communities. The chapter includes three site allocations (Cutting at Park Village East – EA6, Granby Terrace Bridge/Hampstead – EA7 and Cutting at Mornington Terrace – EA8).

2.29 In response to this chapter, there have been approximately eight comments received from:

- Historic England
- Landowner Representatives
- Local Resident
- Regents Park CAAC

Summary of comment	Council response
Support the wording changes to remove maximum caps for homes and jobs, and the wording to acknowledge the indicative heights which aligns with the design chapter.	Support welcomed
The proposal to extend access for walkers from the southern end of Park Village East right up to Hampstead Road is supported. Walkers need also to be fully accommodated on Granby Terrace bridge.	Support welcomed
Wording for Development Principle EAP3 'Camden Cutting' and the Site Allocations within this (Cutting at Park Village East (EA6), Granby Terrace Bridge/Hampstead Road (EA7) and Cutting at Mornington Terrace (EA8)) do not contain bespoke policies on affordable housing or affordable workspace in line with the findings of the EAP Update Viability Assessment.	EAP evidence base reflects the best information available at the time of writing. It is clear that given the prolonged nature of the scheme and the uncertainty around designs and costs, the viability information is consequently limited at this stage and viability will need to be considered in the future when more accurate information is available. The Council worked closely with landowners to establish inputs into the work in line with national guidance and both parties recognised the limitations of the available information. Coupled with the flexibility in the existing and emerging London and Local Plan policies and the recognition that the viability could change over the 25+ years of the EAP Update, it is considered appropriate to seek affordable housing and affordable workspace in line with Local Plan and London Plan policies. Proposed modifications discussed as part of the examination of the Local Plan and in response to the Reg 19 consultation on the EAP Update provide extra clarity on this and highlight the particular challenges with the Euston masterplan area.

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Summary of comment	Council response
	The existing policy framework, provided by the Local and London Plans includes sufficient flexibility to account for variances in viability and bespoke policies for affordable housing and workspace are not necessary in the EAP, nor are they justifiable given the level of information available at this
Considers that there is no basis given for the potential for tall buildings up to approximately 38 metres high (12 storeys) to the east of Park Village East and adjacent to the railway. The 'tall buildings' (plural) referenced are also not specifically identified with a more precise location although they are presumably to be identified with Site allocation EA6.	The EAP Design Strategy identifies that there is potential for tall buildings up to approximately 38 metres high (12 storeys) to the east of Park Village East and adjacent to the railway. This is shown in Figure 3.4 and is identified as site allocation EA6. The Background Report provides the rationale for this and the site allocation notes that the exact height of a tall building would be determined via a planning application which would be determined in accordance with the policies in the EAP Update and the wider Development Plan including specific heritage policies. The Council considers that it can demonstrate a well reasoned and robust rationale and is preparing a topic paper on this issue to support the Plan at examination.
References to site allocations EA6, EA10 and possibly W/ASD1 identify 3 buildings on plan and in visualisation but others – 8 of the 9 proposed buildings visible over the roofline of the Terraces – are not identified. The lack of identification both undermines the ability of communities to participate effectively in plan making (contrary to NPPF 16c) and undermines the protection and enhancement of our historic environment (contrary to NPPF 8c).	Park Village East (EA6), Regents Park Estate (EA10), and Maria Fidelis (EA9) in the foreground of development adjacent to the station (W/ASD1) were specifically identified in View 21 as these were the closest development sites which were visible from the viewpoint. The Council have continued to engage with Historic England to propose modifications which provide greater guidance in relation to the Grade I listed terraces on the east side of the Grade I listed Regents Park (including 2-11 Gloucester Terrace and 1-42 Chester Terrace) with reference to existing development plan policies. The Council considers that it can demonstrate a well reasoned and robust rationale and is preparing a topic paper on this issue to support the Plan at examination.

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Summary of comment	Council response
Would like further clarification on Park Village East and it being shown as being extended on illustrations to meet Hampstead Road as a pedestrian, wheeling and cycle route only for the extended section. Page 169	The new link would be provided through what is currently the HS2 construction site and is shown on the illustrative masterplan (figure 4.4) as reprovided open space Suggest minor modification to make sentence clearer
It is important to preserve historic Cutting enclosure walls from 1900- 06 which are locally listed, contributing to the character and appearance of both Regent's Park and Camden Town conservation areas. This should be acknowledged in this text of the Plan to make this statement more accurate and complete and to support the protection and enhancement of our historic environment	Propose modification
Suggest amendments needed to wording for site allocation EA6 to refer to listed terrace at Gloucester Terrace and change minimise to avoid and/or mitigate	Modification proposed

Drummond Street and Hampstead Road (chapter 4.4)

- 2.30 Development Principle EAP4 Drummond Street and Hampstead Road seeks to ensure that development proposals protect and build upon the existing character of the area and heritage assets and enhance connections, public realm and building frontages. The chapter includes one site allocations (Former Maria Fidelis School EA9).
- 2.31 In response to this chapter, there have been approximately two comments received from:
- Historic England
 - Regents Park Conservation Area Advisory Committee

These are summarised below:

Summary of comment	Council response
Site allocation EA9 Maria Fidelis Suggest modification to text of EA9 to ensure that the impact on setting of St Katharine's Church and that adverse effects on significance are avoided and/or mitigated.	Propose modification
View 20 – Regent's Park towards St Katharine's Church (GII*): Lower / upper ranges of capacity testing demonstrate effects on the Church. Tall buildings, particularly site allocations EA9 (Maria Fidelis) and EA10 (RPE North), would appear in the view and potentially create harm to the significance of the Church. The relevant site allocation policies require clear requirements to avoid such harm.	The Council considers that it can demonstrate a well reasoned and robust rationale and is preparing a topic paper on this issue to support the Plan at examination. Propose modification to provide clarity

Regents Park area (chapter 4.5)

- 2.32 Development Principle EAP5 Regents Park seeks to accommodate new and replacement homes within the Regent's Park Estate and provide wider environmental enhancements to improve the wellbeing of existing and future communities. The chapter includes three site allocations (Regents Park Estate North – EA10, Capital City College – EA11 and Surma Centre – EA12).
- 2.33 In response to this chapter, there have been approximately seven comments received from:
- Historic England
 - Shurgard

These comments are summarised below:

Summary of comment	Council response
Site allocation EA10 Regents Park Estate North Proposals for site allocation 10 (Regents Park Estate North) will result in the loss of c1,500sqm of industrial space. This has not been sufficiently acknowledged or justified within the EAP. Site Allocation EA10 does not specifically provide for any re-provision of industrial floorspace at 1 Stanhope Street, which falls within the area designated for “predominantly residential development”. The storage facility at 1 Stanhope Street specifically provides the type of industrial and storage floorspace which Policy E4 identifies as essential to London's economy. Shurgard provides flexible, secure and affordable storage which accommodates a range of small businesses, residents and tradespeople within the local area. As such, the established use on the Site clearly makes a direct and positive contribution to meeting objectives of the London Plan	The re-provision of storage use (Class B8) is not expected on the site, as the provision of housing and community facilities are prioritised here. The site allocations in the Local Plan and the Euston Area Plan identify the main opportunities to provide new and intensify existing employment sites to provide a better range of workspaces, including the re-provision of industrial uses. Modification proposed. Provision is made for storage space in Policy S1, South Camden of the Submission Draft of the Local Plan. The policy (which covers the Euston area) seeks to ensure that development in the south of Camden “contributes to the area's continued success and London-wide role, while delivering social, economic and environmental benefits for Camden's residents, making the area a more liveable, climate resilient and inclusive place.” Policy S1(P) references alternative sites for relocated storage floorspace and states that (our emphasis): "The Council will ensure that development on allocated sites at Camley Street and St Pancras Way re-provides and intensifies the amount of employment floorspace

Summary of comment	Council response
	across these sites including the appropriate re-provision of industrial, storage or distribution floorspace that supports the functioning of the CAZ and local economy, as part of mixed-use intensification proposals on individual sites or across multiple sites through a wider area plan". The site is an non-designated industrial land. There are many other similar facilities in the surrounding area in addition with recent planning permissions granted by the Council.
Alternatives such as co-location and industrial intensification should be considered as part of the EAP Update as an effective means of retaining industrial floorspace while meeting other needs including the need for new homes. No assessment has been undertaken to show that reasonable alternatives, such as co-location on the Site or re-providing the use elsewhere within the EAP Update Masterplan as part of an industrial intensification, have been explored. These approaches have been shown to deliver additional employment floorspace while meeting housing needs to balance competing land-use requirements.	An intensification of industrial uses is not considered suitable in this densely populated residential area as it could lead to noise, heavy vehicle traffic, and other operational impacts that can be incompatible with residential amenities. It is considered that the redevelopment of the site to provide upgraded and new community facilities, new open space and new homes including new and re-provided affordable housing is a more suitable use of the site. There are many self-storage facilities in the area and industrial intensification in this residential location is not considered appropriate. A design-led capacity study has shown that by delivering housing on the site the optimum amount of development on the site can be delivered.
Suggest modification to text of site allocation EA10 to ensure that the impact on setting of St Katharine's Church and that adverse effects on significance are avoided and/or mitigated.	Modification proposed
Inaccuracies between Background report and site allocation. The view assessments should be opened to community engagement and the results used to modify the Plan.	The Council considers that it can demonstrate a well reasoned and proportionate evidence base and is preparing a topic paper on this issue to support the Plan at examination, including addressing any inaccuracies. Camden have worked with Historic England to ensure that EAP Update contains robust mechanisms to ensure future development proposals conserve significance Following discussions with Historic England, modifications are proposed which highlight particularly sensitive views.

Amphill and Mornington Crescent Station (chapter 4.6)

- 2.34 Development Principle EAP6 seeks to get opportunities to enhance the public realm and accommodate new homes within Amphill Estate. There is one site allocation in this chapter – Amphill Estate Railway Edge (EA13). No comments were received in relation to this chapter

West Somers Town (chapter 4.7)

- 2.35 Development Principle EAP7 wants to see new and improved walking and cycling routes between Euston Station, St Pancras and King's Cross, including along Phoenix Road to enhance the connectivity of the wider area and contribute towards the establishment of a low-traffic neighbourhood. Development should contribute towards creating a safer, healthier and more climate resilient community.
- 2.36 One response has been received from a local resident with comments on the Churchway Estate with concerns about future intensification of the Estate. This is summarised below:

Summary of comment	Council response
There is uncertainty about what the future of Churchway Estate is. It has been designated as a place of intensification on illustrations. plans. The buildings are about to have a huge 'major works' bill which is doubly unjustifiable if the future of the buildings is short lived	The EAP highlights that there are "opportunities for the renewal/ intensification of Churchway Estate will be investigated working with the local community." Further detailed work is needed to understand the potential of the estate to deliver new homes/ make improvement to existing homes and the Council is committed to working with residents and the community to test the potential for the renewal/intensification of the estate.

Delivery, Planning Benefits and Monitoring (chapter 5)

2.37 This section explains the approach to the delivery, planning benefits and monitoring of the Area Action Plan's vision and objectives. It discusses phasing, construction management, delivery, phasing, planning benefits, flexibility and monitoring.

2.38 In response to this chapter, approximately 14 responses were received from the following organisations:

- GLA
- Landowner representatives
- London Property Alliance
- NHS

Summary of comment	Council response
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.	Modification proposed
Deletion of reference to Camden's planning policies being applied flexibly in the Viability and funding section is supported	Support welcomed
Support the amendments that have been made so far in this chapter, but feel more is needed to align the chapter more accurately to the findings of the viability evidence base, as set out later in these representations.	Modifications proposed
Lendlease and the Euston landowner representatives suggest that there is no reasonable prospect of the of the viability improving to where the borough wide policy asks will for these sites be viable, and as such the ask should be appropriately adjusted at the policy making stage.	Points are addressed in the land use, Euston Station masterplan and Camden Cuttings chapters. Modifications are proposed to provide clarity.

Summary of comment	Council response
The NHS seek further clarity in relation to Section 5.7 (Planning Obligations and Infrastructure Delivery) and Appendix 2: Delivery Plans. While Section 5.7 confirms that both Section 106 and CIL can be used to fund health and community infrastructure, the Summary Table in Appendix 2 identifies CIL, in some instances, as the sole potential funding source.	Summary Table in Appendix 2 confirms that both S106 and CIL can be used to fund health and community infrastructure, the Summary Table in Appendix 2 identifies CIL, in some instances, as the sole potential funding source. Propose change to Summary Table in Appendix 2: Health/education (page 246, 247, 249, 251) Not just CIL
The EAP should explicitly acknowledge the need for site-specific viability assessment at the planning application stage and confirm that policy requirements may be applied flexibly where necessary to ensure deliverable development.	The EAP recognises that there are unusual costs involved with redeveloping the station and above tracks and that development viability could be a challenge, noting that viability will need to be considered further as part of future planning applications
The London Property Alliance consider that greater emphasis should be on prioritising national objectives such as economic growth, whilst maintaining flexibility in policy application.	Camden's Local Plan policies include flexibility in setting out planning requirements, in order to take into account viability and other constraints that affect the ability of development to meet policy targets, and development proposals will be considered in this context.
The London Property Alliance have concerns that rigid policy linkages could stall development, recommend that the Plan adopts a flexible phasing strategy that allows development to come forward independently of HS2 where appropriate. This flexibility will be essential to maintaining momentum and confidence during a prolonged construction and transition period.	The EAP recognises that "Flexibility of implementation, consideration of wider costs associated with delivery of constrained sites, and adapting to economic and market circumstances, will be vital in the delivery of this Plan." In drafting the Updates the Council worked closely with landowners to understand potential phasing and recognises that costing and phasing still needs to be confirmed.

Other comments

2.39 There were four other general comments received in relation to the EAP Update.

2.40 Comments were received from:

- Ampthill Square Tenants and Residents Association,
- Bloomsbury CAAC
- Regents Park CAAC

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Summary of comment	Council response
The Ampthill Square Tenants and Residents Association consider that the EAP needs a full rewrite as so many changes	A decision to progress with an update to the EAP was agreed by the Cabinet Member for Investing in Communities and an Inclusive Economy in February 2020. The Updates are considered appropriate to reflect updated information and changing circumstances.
Concern over how an integrated design is to be developed and how planning applications are to be handled if HS2 part of the station is under the HS2 Act and LBC is not the planning authority.	Camden Council are the planning authority for HS2 works and other works development in the Euston area. The HS2 Act establishes a special planning regime for the approval of certain details including the design and external appearance of stations authority under Schedule 17 of the HS2 Act. Camden Council are the determining authority for these approvals (subject to appeal). The Euston Area Plan will be material to their determination insofar as it is material to the matter for approval and the grounds specified in the HS2 Act for the consideration of that matter. Lendlease's future application for development over and around Euston Station will be considered by the Local Planning Authority under the usual planning regime against policies in the Local Plan and EAP and considered in accordance with the Town and Country Planning Act 1990 because it is outside the limits of deviation and so is outside the permission granted by the HS2 Act. New governance arrangements a Euston aim to ensure that there is coordination between the different schemes to integrate the layout of the individual infrastructure and development projects, comprised of the HS2 terminus, the redeveloped NR station and the wider masterplan for development (managed by the Master Development Partner, Lendlease), while also considering the integration of bus, taxi and cycle facilities.
The EAP itself should be called 'Euston and the Camden Cutting' or 'Euston and Hampstead Road to Parkway' and not just plain Euston. Camden needs to stick to the names used for local places before HS2's and the DfT's PR departments became out of control.	The Euston Area Plan has maintained the same title and names of Places Chapters as the adopted 2015 version.

Part 3a: Consultation on the Regulation 18 Draft Euston Area Plan Update 2023

- 3.1 In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Camden held a public consultation on the draft EAP Update running from 4th January 2023 for 6 weeks.
- 3.2 The public consultation was open to local residents, businesses, landowners, workers, community groups and all those with an interest in the Euston Area Plan Update. A range of consultation techniques were used to engage the public and interested parties and encourage feedback:
- Emails notifying interested parties of the consultation period and public drop-in events
 - Online engagement tool, Commonplace, which included summaries of draft policies, maps of sub-areas and questionnaires for each.
 - Details of the consultation were published on the EAP website
 - Facebook, Twitter and Next Door app advertisements
 - Posters with information about the consultation and public drop-in sessions
 - Press advertisement in Camden New Journal on 5th January 2023
 - Site notices throughout the Euston Area
 - Public drop-in sessions held on 17th January 2023 at Surma Centre 8.30am-11.30am, 19th January 1pm-4pm at The St Pancras and Somers Town Living Centre, 24th January 10am-1pm at Dick Collins Hall and 26th January 4pm-7pm
 - Leaflet handout at Euston Station
- 3.3 The Council held a series of meetings with planning officers from neighbouring planning authorities (Barnet, Brent, City of London, Haringey, Islington, and Westminster) and as part of an ongoing dialogue with the GLA, Transport for London and the Master Development Partner, Lendlease. Meetings were also held with major landowners including Royal Mail, UCL, Network Rail and HS2 Ltd.
- 3.4 The full commentary on the Regulation 18 consultation can be found [here](#) and a chapter-by-chapter summary follows.

Summary of responses received to the Regulation 18 consultation

3.5 Landuse Strategic Principle

Summary of Comment	Council response
Comments on the proposed scale and balance of development at Euston with Objections to the reduction in number of new homes alongside an increase in employment space.	The projected housing delivery for the Euston area is lower than that identified in the 2015 Euston Area Plan, taking into account a reduction in enabled land (primarily in the Camden Cutting), additional site constraints, higher costs and viability issues.
Comments made about affordable housing and the need to prioritise local people and additional concern about prioritisation of conventional housing over student housing.	Affordable housing will be delivered in line with policies in the development plan, including Camden's Local Plan and London Plan. The Local Plan sets the priority land use as self-contained housing.
Support was shown for the addition of Knowledge Quarter uses and a mix of education, research, student housing, and appropriate evening activities in Strategic Principle EAP1 with suggestions that a broader definition of Knowledge Quarter uses as future growth areas are uncertain and may have not yet emerged.	Noted and welcomed. The EAP Update highlights the vital role of the Knowledge Quarter innovation district that is plays in the UK economy, in leading fields internationally such as AI, life sciences, cultural and machine learning. Wording to allow for future emerging uses within the sector to be reviewed.
Concerns were raised that the amount of retail space was excessive and retail floorspace provision should not be at expense of operational transport requirements, for example the provision of a suitably sized bus station.	The amount of retail floorspace set out in the EAP Update as appropriate is 20,000sqm and remains unchanged from the EAP 2015. This has been informed by an updated retail study. To avoid over-supply and undermining of existing centres, the provision of additional retail and leisure floorspace above 20,000 sqm would be subject to a Retail Impact Assessment. The EAP Update supports the provision of affordable retail space and Project Partners are expected to prepare a Retail and Leisure Strategy which would need to address the provision of affordable retail space. In relation to Euston station retail, the EAP Update addresses the need to balance the provision of retail against the needs of transport infrastructure.

3.6 Design Strategy

Summary of Comment	Council response
Concerns were raised about overdevelopment, the massing and height of new development and general impact of tall buildings on views and heritages sites.	There have been wording changes regarding the approach to building heights/massing/scale, which makes clear the indicative nature of heights stated within the EAP Update. The new wording clarifies that precise locations and heights for tall buildings will be the subject of a full and proper testing process through detailed masterplanning work and an assessment of impact in line with London Plan policy, site constraints and other factors including legibility, sunlight and daylight. The updated Plan notes 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.
Specific concerns were highlighted about the impact of tall buildings along Eversholt Street and behind Mornington Crescent.	New wording has been added which highlights that new homes on the east side of the station could add “much beneficial activity and vibrancy to the area” which would positively enhance Eversholt Street and stitch the new development to West Somers Town. Tall buildings must be of exceptional architectural quality to justify their position on the skyline. They should also work well together, creating an elegant townscape.
Further clarification and additional assessment was sought regarding potential tall buildings in the wider setting consultation areas and more consideration given to existing heritage assets on either side of the cutting.	In accordance with London Plan policies GG2 and D3, the EAP Update has applied a design led approach to determine the optimum development capacity of sites. General heights that may be appropriate and potential locations for taller buildings have been tested and updated through modelling, taking account of the London View Management Framework, protected vistas and the impact on local views and townscape. Updates to the Design Strategy clarify that building heights have been updated to reflect a design led capacity study including further testing of views and to satisfy the London Plan tall buildings policy. The EAP proposed submission draft includes updates from the January 2023 consultation draft including updating the definition of a tall building so that it is in line with the Local Plan (40 metres in the CAZ and 30 metres elsewhere). This satisfies the London Plan policy D9 requirements.

3.7 Transport Strategy

Summary of Comment	Council response
Support for the general principles of the Transport Strategy including prioritising active travel, Healthy Streets approach and public transport, with flexibility to respond to future demand changes.	Support welcomed
Opposition to taxi and Private Hire Vehicles ranking on Eversholt Street and views that Eversholt Street should be kept open for two-way bus routes.	Wording has been added to ensure that transport modes integrate and work well together, further work is underway to look at how this can be integrated and the latest position included in the EAP Update.
Support for the pedestrianisation of Phoenix Road and improved east–west routes across the station area.	Support welcomed
Need more frequent and safer crossings over Euston Road to enhance accessibility and reduce severance.	Wording has been added regarding an underground pedestrian link between Euston Station and Euston Square Station as part of the Euston Healthy Streets project, in order to help ease the pressure on above ground crossings and help to improve road safety. Further detail on ways to improve the pedestrian environment have been added to the Transport and Public Realm section of the chapter.
Respondents provided support for improving connectivity objective but wanted to see further references to encourage better walking, cycling, and wayfinding links, including connections to Regent’s Canal	The Transport Strategy aims to ensure that redevelopment at Euston provides for the effective and sustainable movement of people onward distribution of passengers, with the vast majority of onward journeys to and from Euston made by walking, cycling and public transport.
Concerns were raised about proposed walkway/ bridge to access Clarkson Row from Cutting could become area for antisocial behaviour	Additional wording recognises that a new east-west pedestrian and cycle links between Park Village East and Clarkson Row/Mornington Terrace is likely to be difficult to deliver due to the height differences between these areas and the proximity of railway infrastructure. If engineering and viability constraints allow then this route should be delivered to improve the permeability of the area.
Euston Road is an important corridor for freight traffic, and concerns highlighted that the removal of freight movements could displace such traffic to local roads.	All transport and public realm measures proposed within the Euston Area will need to be developed in accordance with the wider

	policy vision and enable delivery of the objectives of Camden's Freight and Servicing Action Plan
Representations called for better management of station traffic on Eversholt Street, objecting to taxi ranks on Eversholt Street and suggesting drop offs limited to those with mobility issues with suggestions there is a need for taxi strategy.	The EAP aims to provide suitable taxi facilities that do not impact negatively on the surrounding road networks and communities and additional wording has been added. Taxi and private hire provision will each require a separate management strategy to mitigate their and impacts.
Suggestions were made that HS2 provided taxi rank should be main taxi facility for Euston campus with the Mayor's Transport Strategy prioritises buses over taxis, and this should be reflected in policy and subsequent designs for the site.	New wording has been added specifying that taxi facilities should be provided within the station site as far as possible, but if this is demonstrated to not be feasible, some limited formal taxi pickup and drop-off bays on the public highway for passengers with reduced mobility may be permitted to meet demand from Network Rail passengers, with the preferred location being on Eversholt Street south of Doric Way

3.8 Environment Strategy

Summary of Comment	Council response
A significant environmental concern was for the protection of Euston Square Gardens, particularly its mature trees, which are valued by the community.	The EAP highlights that Euston Square Gardens and existing mature trees should be retained and improved, and use for construction purposes should be limited, with efforts made to fully reinstate for public use as soon as possible.
Representations received sought greater ambition was needed on meeting net zero targets with a need for improvement on air quality in the area.	New wording has been added to ensure that development at Euston is delivered in line with the Local Plan policies including the requirement to be low energy, and incorporate low-carbon heat, be fossil fuel free and maximise opportunities for renewable energy generation.

3.9 Open Space Strategy

Summary of Comment	Council response
There was a clear call for increased provision of genuinely green and accessible open spaces and views that the quantum of open space replacement is insufficient particularly in the Cuttings area	New wording has been added to the Open Space Strategy which asks for a site wide open space strategy 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
Request more details on incorporating biodiversity in the Plan.	Additional wording sets out that any requirements for open space and biodiversity provision generated by new development should be considered holistically alongside any HS2 mitigation requirements to provide open space to contribute toward the objectives of the EAP.
The text and illustration of HS2 replacement open space as it was considered that a minimum quantum of replacement open space is not outlined in the HS2 Act or EMRs.	HS2 works are subject to the High Speed Rail Phase One Environmental Minimum Requirements (EMRs). These set out the high- level environmental and sustainability commitments to be implemented during the planning and implementation of works along the Phase One line of route. There are a number of Undertakings and Assurances in place which are the commitments made by the Secretary of State in relation to the High Speed Rail (London to West Midlands) Act 2017. They form part of the EMRs and include measures that will help to mitigate the impacts in Camden. The Council understands that this should be the benchmark for open space re-provision.
Further clarification was requested for Langdale Open space and green, better public spaces on Eversholt Street and Euston Road alongside improvements to the west side of Eversholt Street.	HS2 were proposing to provide new open space, referred to as Langdale Open Space or the 'Z-plots,' in the area between the new track retaining wall and housing in Langdale, Coniston and Cartmel. This space would help to mitigate the loss of local open space lost to HS2 works. It would also provide a green pedestrian and cycling link between Hampstead Road and Park Village East. Additional wording is in the EAP Submission draft that says that the amount of reprovided open space capable of being provided over the tracks and elsewhere by HS2 has been reduced. Should it be possible to re-provide the lost open space elsewhere, there could be potential for a development plot in this location.

3.10 Delivery and Viability

Summary of Comment	Council response
Comments made regarding the effective deferral of considering viability until the application stage	Wording has been added clarifying that it is expected that the costs for Over Site Development (OSD) at Euston will become known incrementally over the various stages of development. Wording has been added that says that given the unavailability of confirmed costs, it is expected that further viability assessment will support a planning application for the station and tracks area and the Cuttings as no alternative evidence available.
For the scheme to be viable, development needs to be brought forward significantly in excess of that which is currently provided for in the EAP Update.	A design led capacity exercise has informed the capacities in the Plan taking into account existing policy constraints and guidance and seeking to optimise capacity in line with London Plan guidance. This was updated between reg 18 and reg 19 to reflect where land is expected to be enabled for development - capacities have been optimised and wording added to indicate that should designs be updated it may be possible to deliver additional capacity.
Concerns were raised that wording relating to flexibility applies an inappropriate emphasis on building heights being considered through the assessment of viability at application stage whereas the London Plan states the viability testing is to assess the maximum level of affordable housing.	Update proposed.

3.12 Following consultation that took place on the Regulation 18 draft new EAP, further engagement took place with key stakeholders, including:

- Neighbouring boroughs
- GLA;
- Transport for London;
- Historic England;

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- HS2 Ltd.;
- Lendlease;
- Network Rail;
- Department for Transport
- Ministry for Housing Communities and Local Government
- Community meetings

3.13 The outcomes of this engagement are reflected in the [Duty to Co-operate Statement](#).

Part 3b: Summary of ‘direction of travel’ consultation - 2024

- 3.13 Soon after the Regulation 18 consultation, the Government announced a pause to HS2 works at Euston, while strategic decisions were made about the future of Euston. With the publication of its Network North paper in October 2023, the Government confirmed that HS2 will come to Euston. The Euston team held a supplementary consultation in the Summer of 2024, which aimed to set out the recent key Government announcements about Euston and the effect that they could have on the updates to the Euston Area Plan (EAP).
- 3.14 The consultation ran from 8th July to 8th September 2024. In reviewing the limited information that was available at the time, it was considered that many of the issues for the Euston Area remained broadly the same, similarly the Council's aspirations for the area. There were, however, some elements that changed and this supplementary consultation highlighted these where possible. The 2024 consultation was additional to the 2023 consultation and all responses to both consultations have been considered in the Regulation 19 Submission draft of the EAP Update. A full summary of the Supplementary consultation can be found in section 5 of the Consultation Statement [here](#).
- 3.15 The public consultation delivered eight weeks of targeted communications to local residents, businesses and stakeholders through a number of channels encouraging engagement with the consultation and participation in community drop-in sessions. This included paid advertising on Facebook, use of Commonplace platform, press release and a newspaper advert, targeted content on Nextdoor, print advertising, posts to X, and the regular use of business, resident and staff newsletters as well as Media release via WeAreCamden website and emails notifying interested parties.
- 3.16 Over 25 A4 sized site posters were displayed throughout the Euston Area on lampposts and notice boards for the duration of the consultation, with information posted about the consultation and advertising the public drop-in events. Two drop-in events were held within the consultation period where interested stakeholders could attend to view the consultation materials and discuss proposals directly with Council officers. These events were held on the following dates and locations:
- Monday 15th July 2024, 12 to 1pm, online via Microsoft Teams
 - Wednesday 17th July, 4.30 to 6pm, in person at Euston Skills Centre.
- 3.17 The Euston Team also held separate briefings for community groups and organisations where requested. The public consultation was open to local residents, businesses, landowners, workers, community groups and all those with an interest in the Euston. The Council held a series of meetings with planning officers from neighbouring planning authorities (Barnet, Brent, City of London, Haringey, Islington, and Westminster) and as part of an ongoing dialogue with the GLA, Transport for London and the Master Development Partner, Lendlease. Meetings were also held with major landowners including Royal Mail, UCL, Network Rail and HS2 Ltd.

- 3.18 The consultation booklet, the in-person and online consultation events and Commonplace platform set out the following key questions:
- i) Do you have any comments on the overall proposed approach set out in this consultation?
 - ii) Do you have any comments on the suggested approach to the Euston Station and tracks chapter given the uncertainty here?
 - iii) Do you have any comments on the suggested approach to the Euston Road chapter given the uncertainty here?
 - iv) What are your views on the proposed site allocations set out here?
 - v) What are your views on priorities for new routes? (East to West connections and North to South)
 - vi) Do you have any suggestions for additional sites or locations which could be suitable for conversion to housing not currently identified here?

Summary of responses received to the Supplementary consultation

- 3.19 As a result of consultation responses received through the supplementary consultation carried out in 2024, changes were made to the EAP Update and reflected in the EAP proposed Submission Draft. Commentary on this with the Council's response are shown in the following section. The full commentary on the Regulation 18 consultation can be found [here](#) and a chapter by chapter summary follows.

3.20 Overall Comments

Summary of Comment	Council response in EAP submission draft
Support for the importance of Camden's EAP objectives and continued recognition on the comprehensive approach to development, including highlighting the importance of placemaking, improving connectivity and providing replacement and new open spaces.	Support welcomed
Comments were made that greater emphasis should be made that development will play a crucial role in the funding and delivery of the transport infrastructure. Funding strategies assume that development is optimised to recycle profits into the business case for infrastructure.	The Delivery, planning benefits and monitoring section of the EAP has been updated emphasising the challenges with viability, especially as there are currently no confirmed design or costs for the National Rail, HS2 or London Underground stations and noting that it is expected that the costs

Summary of Comment	Council response in EAP submission draft
	for Over Site Development (OSD) at Euston will become known incrementally over the various stages of development.
General concerns were raised about how height figures are presented, suggesting that they should be shown as indicative (not maxima).	The height figures are intended to provide a potentially appropriate height range rather than providing exact heights. As such, the reference to height "caps" in the Consultation Statement (June 2024) was unintentional. The acceptability of particular development proposals will need to be justified and this will be assessed against the policies in the Development Plan.
Comments were made that overall there should be less focus on the delivery of HS2 redevelopment proposals, and more on redevelopment of Network Rail's Euston station as an integral part of the overall regeneration of Euston.	Apart from in very specific locations the EAP generally refers to the stations (plural) at Euston, the EAP continues to recognise, and advocate for the comprehensive development of the area (including the NR, HS2, LU and bus facilities) in order to recognise the areas true potential, helping to address, rather than add to the problems created by the existing infrastructure.
Comments received related to a more flexible and comprehensive approach needed with regard to land use and further clarification on the deliverable options on sites and the evidence behind specific allocations of sites.	There are many references to flexibility in the Submission Draft EAP. A Topic Paper has been produced about the site allocations and capacity studies for each site.
Evidence base for the EAP to be published	Reg 19 consultation has published full draft EAP Update and all evidence base documents.

3.21 Landuse Strategy

Summary of Comment	Council response
Highlighted the urgent need for more affordable housing, particularly at early stages of development.	The EAP maintains that developers will be required to deliver affordable housing in line with policies in the Camden Local Plan and the London Plan and to provide the maximum reasonable level of affordable housing on individual sites.

Summary of Comment	Council response
Differing views were provided about housing above the station, with some views it was not welcome and others that planned reforms of leasehold would encourage building above the station.	The EAP recognises that there are extraordinary costs of building above the station and tracks as well as constraints associated with railway infrastructure. Further guidance provided.
Concerns were raised about the identification of housing estates around Euston for regeneration and densification on the site allocations map with concern that this could cause insecurity around peoples' homes.	The EAP sets out in the EAP that further work to test viability and funding of any additional housing proposed at later stages will be required following more detailed feasibility work and consultation with residents.
A suggestion of a Housing Compact was made to ensure that those who have lived through decades of disruption are able to access decent homes in the place they want to live.	The Council has developed a Housing Pact with residents to strengthen transparency and community voice in the delivery of new homes across Euston. This is outside the work of the Euston Area Plan.
Comments received emphasised the importance of educational uses and the need to support the demand for student housing.	Additional wording is used in the EAP submission draft to recognise “non-traditional” housing types including but not limited to student housing and buy to rent units. There is added wording regarding measures to enable local people to access employment opportunities and suitable education and training to enable them to fill future good quality positions generated by the development in line with Local Plan policies.
There should be greater focus on creating and retaining floorspace for Knowledge economy growth sectors which also ensure that genuine local benefits are reaped	The EAP Update has a section focusing on the creation of suitable floorspace for knowledge economy uses. One of the objectives for the Landuse Strategy is to provide jobs and boost the local economy. Wording is included which seeks to deliver social value.
Comments were made that the approach to affordable workspace should be flexible, particularly for lab enabled floorspace and that fully fitted lab space should be considered as a form of affordable workspace and should not necessarily be defined purely in terms of rental subsidy.	The Plan outlines that affordable workspace should be provided in line with the London and Local Plan policy and guidance which allows for a flexible approach and the impact of scheme viability. Further guidance is included.

3.22 Design Strategy

Summary of Comment	Council response in EAP submission draft
Support was given for the definition of a tall building however concerns were raised about the impact on the historic environment as a result of increased height of buildings and heights should be in general reduced to align with the reduction in the HS2 station size.	Support welcomed. In accordance with London Plan policies GG2 and D3, the EAP Update has applied a design led approach to determine the optimum development capacity of sites. General heights that may be appropriate and potential locations for taller buildings have been tested and updated through modelling, taking account of the London View Management Framework, protected vistas and the impact on local views and townscape. Updates to the Design Strategy clarify that building heights have been updated to reflect a design led capacity study including further testing of views and to satisfy the London Plan tall buildings policy.
Concerns were raised regarding the inclusion of Ampthill, Regents Park and Churchway Estates as site allocations in the interest of local residents.	Recognising that further work with residents is needed to establish the potential for housing on these housing estates, they are no longer proposed as site allocations and new wording is provided for the Ampthill and Mornington Crescent, Regents Park Estate and West Somers Town chapters saying that should further sites be identified for housing, the Council will work closely with residents and communities to explore options for delivering longer term housing-led regeneration on the Estate. This is in line with Central Government's focus on delivering more housing at Euston.
The long-term phasing approach to redevelopment of Euston is a key consideration and the future and the Plan needs to recognise and support the need for development to occur in self-contained stages.	The EAP recognises that phasing is indicative and added wording to make clear that the Update is based on the best understanding at the time of writing.

3.23 Transport Strategy

Summary of Comment	Council response in EAP submission draft
Support given for general principles including prioritisation of active travel and public transport over private vehicles, PHVs and private taxis.	Support welcomed

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There will be no east / west routes through the station, only north / south around the station as per current HS2 / Network Rail designs.	As set out in the Design Strategy, the Transport Strategy includes new wording recognising that there may be design limitations in Euston Station which result in fewer over station routes being delivered. However, delivery of these routes remain an aspiration and alternative connections should be sought.
The Plan could make reference to safeguarding/ enabling options which would help improve permeability through the site, pedestrian links can potentially be delivered in the future	Additions have been made to the Transport Strategy illustration which highlight that new walking routes over the station are long term.
Cycle lanes should be reintroduced on Euston Road if East to West connections over the station are not realised.	Additional wording to Euston Road chapter to say "Improvements to east west cycling will need to consider segregated infrastructure where feasible. If such infrastructure is not provided on Euston Road, alternative routes should be signposted and upgraded."
Support given generally to the focus on improving pedestrian and cycle safety.	Wording has been added to the supporting text about poor road safety records in the area and new measures need to take account of Camden's Road Safety Action Plan.
Support to the importance of delivering the Euston Healthy Streets schemes and the Euston Partners role in supporting their delivery.	Wording has been added to leverage opportunities for new and emerging mobility to contribute to achieving the healthy streets objectives as well as creating safer pedestrian routes, bus connections and improved cycle connectivity through upgrades on Euston Road, Hampstead Road and Eversholt Street.
Requests for the bus station to be retained	The EAP provides an opportunity to establish a bus facility that meets both operational needs and the needs of bus passengers, Additional wording seeks to set out the aim of creating a high quality interchange. Changes include more wording about what the key requirements of the bus facilities are.
There is a need to reference the station complex to provide an enhanced bus station which will support future demand, help encourage modal shift to sustainable transport modes and support effective interchange, providing for pedestrians, cyclists and public realm.	Wording added regarding walking and cycling measures to encourage sustainable travel, improve connectivity and overcome existing severance challenges within the Euston area (such as across Euston Road and the station site) as well as improving connectivity to the wider area, including north towards Camden Town and south towards Bloomsbury and the River Thames.

3.24 Open Space Strategy

Summary of Comment	Council response in EAP submission draft
The open space illustration is unclear	Revisions have been made to make the illustration clearer.
Specific levels of open space are required as there is limited open space in the area.	As designs for the station and associated development are evolving it is not possible to say exactly what open space should be delivered where. The EAP includes a framework for future delivery and the updates reflect the latest position regarding stations designs, acknowledging that alternative solutions will need to be found to account for station design changes
Onerous requirements for open space which would limit the amount of development that can be achieved and therefore the land receipts that will be generated to fund the necessary transport infrastructure	The requirements in the EAP Update reflect the commitments made by the Secretary of State and reference the levels of open space re-provision shown in the Environmental Statement (ES) accompanying the HS2 Act (and subsequent updates). The Council considers that this 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, 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. Open space to support the development should be provided in line with development plan policies.
Future drafts of the EAP will need to consider creative opportunities, as highlighted within the Open Space Study, for the incorporation of new green infrastructure.	The EAP Update already has a section within the Open Space Strategy on Green Infrastructure.
Importance of retrofitting buildings rather than demolition.	Additional wording has been inserted in the Environment Strategy setting out retrofit and circular economy principles and that retrofit of existing building is strongly supported by the Council. Developers must demonstrate that they have thoroughly explored options for retaining and retrofitting existing buildings in line with Development Plan policies and with reference to the GLA's Guidance on Circular Economy.

3.25 Euston station and tracks

Summary of Comment	Council response in EAP submission draft
There is uncertainty surrounding the final number of HS2 platforms	The EAP recognises that there is currently no confirmed station design. The EAP aims to provide a strategic framework for development at Euston, setting clear objectives and outcomes for delivery. Wording is included to provide context on the latest position, including future proofing designs to allow for future extension. The EAP Update recognises that the new HS2 terminal will impact the conventional station by reducing the footprint and number of platforms available. The EAP Update continues to seek to refine and shape any station design to better meet EAP objectives.
It is important to have a northern entrance to the station to allow for connections to Camden Town and Mornington Crescent	The EAP Update has aspirations to improve north-south connections including to the north of the station and onwards to Camden Town.
There are ambitions for the Royal Mail site to come forward as a Knowledge Quarter scheme that allows for a flexible and comprehensive approach	Detail on site allocations for Royal Mail site (EA2) have been added that include the context and existing uses of the site, development and design principles, potential location of taller buildings, infrastructure requirements and other considerations. The allocation suggests the allocated use should be "Mixed use development: permanent self-contained homes and employment". Housing is the priority landuse for Camden and the site is considered appropriate for mixed used development.
The existing station needs to be improved now to improve accessibility and improve conditions for people waiting for trains.	The EAP recognises that the existing Euston station is dated and in need of investment. The EAP Update provides further detail on aspirations to improve accessibility to the station.

3.26 Euston Road chapter

Summary of Comment	Council response in EAP submission draft
Support for a long term vision for Euston Road and the need for it to be a welcoming, green place for pedestrians, recognising the longer distance movements of goods by motor vehicles.	Support welcomed
Requests for wording to be added stating the ambition for a Gordon Street entrance subject to further modelling.	The EAP acknowledges TfLs ambition for a Gordon Street entrance and seeks to ensure improvements to footways around the new underground

	entrance on Gordon Street (if it is delivered), to accommodate increases in pedestrian numbers. Additional wording recognises that Gordon Street is an area that is expected to see an increase in pedestrian pressure which would require a most significant upgrade.
The extension of the Network Rail station concourse to the south, over the open space of Euston Piazza needs to replace open space elsewhere on site and be designed so there is a proper, safe station forecourt so that passengers do not spill over Euston Square Gardens.	The EAP Update includes a chapter on open space which seeks the reprovision of open space lost to HS2 and requires an open space strategy to be developed. Additional wording has been inserted recognising that the impact of the stations at the ground floor should be carefully balanced to ensure that there is sufficient space for station operations (entrances, concourse and associated retail) while also creating active streetscape, providing good quality entrances to development plots, and carefully integrating the new uses with the existing surroundings.
Network Rail and HS2 stations should work together to minimise spatial extent (footprint), maximise the provision of shared services (including bike stores) within the station enclosures, and prioritise housing and open space.	The EAP Update highlights the importance of a comprehensive approach and requires a joint planning design approach from Network Rail and HS2 to ensure that the design of the new HS2 and redeveloped stations facilitates over-site optimal development potential and the forecourt area meets the above development principle
Detailed comments objected to the suggestion that the Euston Tower site may be suitable for the inclusion of housing as part of a mixed-use scheme	The Euston Tower does not form part of the site allocations for the EAP Submission Draft. Further detail can be found in the Site Allocations Topic Paper.

3.27 Camden Cutting

Summary of Comment	Council response in EAP submission draft
Development plots between Granby Terrace and Hampstead Road bridges are not funded or enabled in HS2 designs therefore should be removed from the plan.	The number of potential new homes in the Cutting has been revised to at least 500 due to the current understanding of land that could be enabled for development. Further clarification is provided with reference to the complexity and costs of developing over live railway tracks and future development potential should the engineering and feasibility constraints

	change. The Camden Cutting is identified as having potential to provide space for the reprovision of some of the open space lost to HS2.
Comments highlighted that the Plan should seek to protect views including those from Regent's Park and objections were made in relation to proposals to build residential accommodation in the Cutting area which had previously been outlined for open space.	General heights that may be appropriate and potential locations for taller buildings have been tested and updated through modelling, taking account of the London View Management Framework, protected vistas and the impact on local views and townscape. Updates to the Design Strategy clarify that building heights have been updated to reflect a design led capacity study including further testing of views and to satisfy the London Plan tall buildings policy. Viability work has indicated that the delivery of a significant open space to the north of the open space as indicated in the EAP 2015 is not viable. The open space strategy demonstrates how open space could be delivered in the Plan area in line with the development plan and commitments from the Secretary of State. Updates are provided to clarify this position.

Part 3c) Summary of changes in response to Regulation 18

- 3.28 A number of responses to the regulation 19 consultation, welcome the changes that have been made in relation to the regulation 18 consultation, including from the GLA, Lendlease and the Euston Landowners, the NHS, HS2 Ltd. and Historic England.

Strategic Principle EAP1 - Landuse Strategy

- 3.29 Following updated capacity studies and in response to changes to the amount of land enabled for development as a result of the transport schemes, the number of homes has been updated to “in the region of 2000 new homes” (following 1,500 to 2,800 as set out in the 2023 draft and 2,800 – 3,800 homes in the adopted 2015 version of the EAP). The majority of growth will be above the station and tracks and changes to Strategic Principle EAP1 reflect the building constraints and cost savings required. Additional wording discusses market rents recognising that they are beyond the reach of many families in housing need. In the updated Plan, the Council encourages the provision of genuinely affordable housing in line with the preferred affordable housing tenures identified in the Local Plan and London Plan and the tenure mix identified in the Local Plan.
- 3.30 The Proposed Submission draft includes an increase in the number of jobs which is in large part due to an increase in the ratio of workers per square metre of floorspace since the current EAP was adopted, so that more jobs can be accommodated on the same amount of employment floorspace. The projected housing delivery for the Euston area is lower than that identified in the 2015 Euston Area Plan, taking into account a reduction in enabled land (primarily in the Camden Cutting), additional site constraints, and higher costs and viability issues. The EAP maintains that developers will be required to deliver affordable housing in line with policies in the Camden Local Plan and the London Plan and to provide the maximum reasonable level of affordable housing on individual sites. .
- 3.31 There have been updates to Strategic Principle EAP1 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. The Reg 19 Submission Draft of the EAP removes reference to exceeding targets (noted as a concern at Regulation 18) and provides clarification about priority land uses should new areas for development be identified through design refinement of the station. The amount of retail floorspace set out in the EAP Update as appropriate is 20,000sqm and remains unchanged from the EAP 2015. This has been informed by an updated retail study. To avoid over-supply and undermining of existing centres, the provision of additional retail and leisure floorspace above 20,000 sqm would be subject to a Retail Impact Assessment. The EAP Update supports the provision of affordable retail space and Project Partners are expected to prepare a Retail and Leisure Strategy which would need to address the provision of affordable retail space. In relation to Euston station retail, the EAP Update addresses the need to balance the provision of retail against the needs of transport infrastructure.
- 3.32 The Regulation 19 submission draft EAP sets out that new employment floorspace in the Euston Area should include a significant amount of affordable workspace in line with Camden’s affordable workspace strategy. The Plan outlines that

affordable workspace should be provided in line with the London and Local Plan policy and guidance which allows for a flexible approach and the impact of scheme viability. Even in areas identified for predominantly residential use, this does not exclude the potential for a range of mixed uses including employment floorspace and affordable workspace. The EAP Update highlights the vital role of the Knowledge Quarter innovation district that is plays in the UK economy, in leading fields internationally such as AI, life sciences, cultural and machine learning.

- 3.33 Informed by the health impact assessment, additional wording was also added to strengthen the cross cutting theme of health and wellbeing.

Strategic Principle EAP2 - Design Strategy

- 3.34 In accordance with London Plan policies GG2 and D3, the EAP Update has applied a design led approach to determine the optimum development capacity of sites. General heights that may be appropriate and potential locations for taller buildings have been tested and updated through modelling, taking account of the London View Management Framework, protected vistas and the impact on local views and townscape. Updates to the Design Strategy clarify that building heights have been updated to reflect a design led capacity study including further testing of views and to satisfy the London Plan tall buildings policy. The EAP proposed submission draft includes updates from the January 2023 consultation draft including updating the definition of a tall building so that it is in line with the Local Plan (40 metres in the CAZ and 30 metres elsewhere). This satisfies the London Plan policy D9 requirements.
- 3.35 In addition, there have been wording changes regarding the approach to building heights/massing/scale, which makes clear the indicative nature of heights stated within the EAP Update. The new wording clarifies that precise locations and heights for tall buildings will be the subject of a full and proper testing process through detailed masterplanning work and an assessment of impact in line with London Plan policy, site constraints and other factors including legibility, sunlight and daylight. The updated Plan notes 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. Additional wording sets out that the general height that may be appropriate for new development in the southwest part of the Cuttings and to the north of the Regent's Park Estate is 20-33 metres (6-10 storeys) and that development at the upper end of the indicative height range (33 metres/ 10 residential storeys which equates to between 57m and 80m AOD) would qualify as a tall building and would need to demonstrate compliance with Tall Building policy. To the east of Park Village East and adjacent to the railway, new wording outlines that there is potential for tall buildings up to approximately 38 metres high (12 storeys), which equates to between 51 meters and 84 metres AOD. The design of such development should take account of the setting of nearby heritage assets and seek to make a positive contribution to local views.
- 3.36 Further wording about design codes has been added which should be based on effective engagement with local communities about its content to provide greater certainty for the local community about the design of the development and to ensure meaningful engagement throughout the design and planning process. The

Design Code will form part of the control mechanisms and conditions for future planning applications within the development area

- 3.37 The Design Strategy recognises that if ground level routes across the station are not possible, routes at upper levels above the station concourse could be explored.

Strategic Principle EAP3 - Transport Strategy

- 3.38 The Transport Strategy aims to ensure that redevelopment at Euston provides for the effective and sustainable movement of people onward distribution of passengers, with the vast majority of onward journeys to and from Euston made by walking, cycling and public transport. Additional wording has been added regarding providing new facilities needed to accommodate increased travel demand within the station site to mitigate impacts on the public highway in accordance with Camden's Road User Hierarchy. Also new wording has been added about reducing and mitigating the impact of general motor traffic and transport-based emissions and noise, to create a safer and more pleasant environment and to make essential motor vehicle journeys, such as those made by public buses, more efficient on roads in and around Euston.
- 3.39 In terms of buses, wording has been added to ensure that buses that integrate with other key modes, with regard to protecting bus journey times and Camden's Road User Hierarchy and interchange facilities for buses and taxis are created that are both efficient, accessible and integrate seamlessly with the development, that have regard to Camden's Road User Hierarchy and enhance the public realm. Wording is added to leverage opportunities for new and emerging mobility to contribute to achieving the healthy streets objectives as well as creating safer pedestrian routes, bus connections and improved cycle connectivity through upgrades on Euston Road, Hampstead Road and Eversholt Street.
- 3.40 As set out in the Design Strategy, new wording recognises in the Transport Strategy that there may be design limitations in Euston Station which result in fewer over station routes being delivered. However, delivery of these routes remain an aspiration and alternative connections should be sought.

Strategic Principle EAP4 - Environment Strategy

- 3.41 New wording has been added to ensure that development at Euston is delivered in line with Local Plan policies including the requirement to be low energy and incorporate low-carbon heat, be fossil fuel free, and maximise the opportunity for renewable energy generation. New wording has added detailed about the need to explore innovative heat network opportunities, maximise resource efficiency and ensure that circular economy principles are adopted. The updated Plan recognises that that due to the constraints of development associated with railway infrastructure, delivering net zero carbon onsite could be challenging, therefore where it is not possible to achieve an energy balance of net zero carbon in operation, opportunities for renewable energy generation or retrofit should be explored across the wider Euston area. There is significant potential for energy efficiency improvements and renewable energy systems across the Regents Park Estate as an example.

Strategic Principle EAP5 - Open Space Strategy

- 3.42 In terms of Open Space, the Strategic Principle EAP5 highlights that Camden's priority will generally be for green spaces and that the Council will generally not support public open space dominated by hard landscaping unless the need for this can be strongly justified. Additional wording has been added, acknowledging the challenge and need to find a more affordable HS2 station design and new open space north of the station above railway tracks is no longer feasible. The wording refers to the need to find an alternative location for reprovided land and the provision of as much open space as is feasible in accordance with the commitments made by the Secretary of State and noting the site constraints.
- 3.43 Extra wording has been added to ensure that any requirements for open space and biodiversity provision generated by new development should be considered holistically alongside any HS2 mitigation requirements to provide open space to contribute toward the objectives of the EAP.

Development Principle EAP1 - Euston Station and Tracks

- 3.44 Changes to wording of the Development Principle EAP1 include a revised potential number of new homes and jobs. The range in the number of homes also acknowledges the challenge of delivering homes as part of a complex station redevelopment. The Principle outlines that the delivery of development at Euston Station and tracks should be linked to and support the development of new housing, and open space at Camden Cutting.
- 3.45 The new text sets out that designs for the new or redeveloped Euston Stations will need to be well integrated with adjacent or over station development in order to create a coherent, legible, inclusive and inspiring new piece of city. New wording recognises the importance that the architecture conveys through scale and architectural language but also that this is a significant transport interchange therefore the design needs to be driven by the changing and emerging context as well as responsive to the specific heritage of this central London neighbourhood.
- 3.46 Additional text recognises that there may be significant gaps between phases of development as a result of the interface between development plots and the station infrastructure.
- 3.47 New supporting text acknowledges that development should be arranged to provide sufficient space adjacent to the northern edge of Euston Square Gardens for a generous green pedestrian route connecting Cobourg Street to Eversholt Street via the new public space in front of the stations. This new text seeks to ensure that the new route, public realm and space in front of the station are designed to integrate and connect with Euston Square Gardens.
- 3.48 Revised wording has been inserted with regard to viability and funding of the Euston Station and Tracks area and the high economic output in the Knowledge Quarter as well as the Government's recently published Science and Technology Framework that recognises the area's clusters as containing a portfolio of critical technologies essential to the UK's future prosperity.

- 3.49 References to flexibility have been added to the supporting text to highlight that the delivery of housing above the station should be fully explored, recognising that with the unusual costs involved in redeveloping the station and above tracks, development viability could be a challenge. Where it can be justified, the Council will consider whether an alternative approach to development above the station could meet the objectives of the EAP and the Local Plan. Detail on site allocations for Euston station (EA1) and Royal Mail site (EA2) have been added that include the context and existing uses of the site, development and design principles, potential location of taller buildings, infrastructure requirements and other considerations.

Development Principle EAP2 - Euston Road

- 3.50 Changes to this Places chapter for Euston Road include details of three site allocations for The Place and Premier Inn (EA3), 250 Euston Road (EA4) and Euston Square Hotel (EA5) (added at reg 19 draft). Details added include the context and existing uses of the site, development and design principles, potential location of taller buildings, infrastructure requirements and other considerations. Clarity is also provided that the respective landowners have responded to the call for sites / expressed an interest in redevelopment and will play a critical role in site delivery.
- 3.51 Wording has been added regarding an underground pedestrian link between Euston Station and Euston Square Station as part of the Euston Healthy Streets project, in order to help ease the pressure on above ground crossings and help to improve road safety. Further detail on ways to improve the pedestrian environment have been added to the Transport and Public Realm section of the chapter.
- 3.52 With regard to Euston Square Gardens, extra wording has been added to provide clarity that the London Squares Preservation Act is disapplied for the duration of the HS2 build and HS2 will be responsible for reinstating and upgrading the gardens in order to help mitigate the open space permanently lost.

Development Principle EAP3 – Camden Cutting

- 3.53 The number of potential new homes in the Cutting has been revised to at least 500 due to the current understanding of land that could be enabled for development. Further clarification is provided with reference to the complexity and costs of developing over live railway tracks and future development potential should the engineering and feasibility constraints change. The Camden Cutting is identified as having potential to provide space for the reprovision of some of the open space lost to HS2.
- 3.54 Extra detail has been added about the area being identified as a potential location for taller buildings and the need for tall buildings to be of highest architectural quality and take into consideration the setting of listed buildings and conservation areas, giving particular attention to the impact on views from Park Village East and Mornington Terrace. Additional wording highlights that building heights detailed are indicative and precise heights need to be fully tested through detailed masterplan work and assessment of amenity impact.

- 3.55 Changes to this Places chapter for Camden Cutting include details of three site allocations for Cutting at Park Village East (EA6), Granby Terrace Bridge/Hampstead Road (EA7) and Cutting at Mornington Terrace (EA8). Details added include the context and existing uses of the site, development and design principles, potential location of taller buildings, infrastructure requirements and other considerations.

Development Principle EAP4 - Drummond Street and Hampstead Road

- 3.56 Wording has been added to the Development Principle to include the delivery of new homes where opportunities arise, that the former Maria Fidelis School site could be redeveloped to deliver new homes. Detail on the triangle site to the north of former Maria Fidelis site is provided for it to provide commercial or cultural-led mixed use floorspace.
- 3.57 Extra clarity has been added to protect Drummond Street's role as a neighbourhood centre, highlighting that there is an Article 4 Direction to remove permitted development rights that allow uses within Class E to change to residential without planning permission.
- 3.58 Changes to this Places chapter for Drummond Street and Hampstead Road include details of one site allocation for the former Maria Fidelis School (EA9). Details added include the context and existing uses of the site, development and design principles, potential location of taller buildings, infrastructure requirements and other considerations.

Development Principle EAP5 – Regents Park area

- 3.59 Wording has been added on social infrastructure provision in the area, in regard to the provision of housing on the Capital City College site, should the college be relocated or demonstrated to no longer be needed. Also the provision of sufficient new community facilities to support new development. New wording is provided that should further sites be identified for housing, the Council will work closely with residents and communities to explore options for delivering longer term housing-led regeneration on the Estate. This is in line with Central Government's focus on delivering more housing at Euston.
- 3.60 Changes to this Places chapter for Regents Park area include details of three site allocations for Regents Park Estate North (EA10), Capital City College (EA11) and Surma Centre (EA12). Details added include the context and existing uses of the site, development and design principles, potential location of taller buildings, infrastructure requirements and other considerations.
- 3.61 Additional wording has been included regarding public realm improvements on the Estate with opportunities to secure funding from the GLA, TfL or other sources to implement specific greening and public realm upgrades. In addition wording has been added detail about various funding sources delivering road safety improvements including improvements for pedestrians and cyclists as part of the Safe and Healthy streets Project. This includes traffic calming and reduction measures, safer road crossings and improvements to junctions and routes for pedestrians and cyclists, along with green infrastructure and public space improvements.

Development Principle EAP6 - Ampthill and Mornington Crescent Station

- 3.62 New wording is provided for this chapter saying that should further sites be identified for housing, the Council will work closely with residents and communities to explore options for delivering longer term housing-led regeneration on the Estate. This is in line with Central Government's focus on delivering more housing at Euston.
- 3.63 Changes to this Places chapter for Ampthill and Mornington Crescent Station area include details of one site allocation at Ampthill Estate railway edge (EA13). Details added include the context and existing uses of the site, development and design principles, potential location of taller buildings, infrastructure requirements and other considerations.

Development Principle EAP7 – West Somers Town

- 3.64 Additional wording has been added to reduce through traffic on Eversholt Street in order to improve bus priority and the safety and amenity of walking and cycling.

Delivery, planning benefits and monitoring

- 3.65 The Delivery, planning benefits and monitoring section of the EAP has been updated emphasising the challenges with viability, especially as there are currently no confirmed design or costs for the National Rail, HS2 or London Underground stations and noting that it is expected that the costs for Over Site Development (OSD) at Euston will become known incrementally over the various stages of development. Wording has been added that says that given the unavailability of confirmed costs, it is expected that further viability assessment will support a planning application for the station and tracks area and the Cuttings.

Part 4: Early engagement undertaken to inform the preparation of the draft new Euston Area Plan Update

- 4.1 The EAP Update is a partial update of the EAP 2015 rather than a new plan, and comments received, and issues identified through the consultation on the draft planning brief (which the Council consulted on in early 2020 and which included guidance for development above Euston station as well at the other sub-areas identified in the EAP) and the adopted EAP have informed the EAP Update where appropriate.
- 4.2 The update to the EAP has included a range of consultation and engagement, with informal engagement with communities alongside the more formal consultation stages in the regulations. These have taken place among ongoing communication with local stakeholder groups and participation at community meetings. The EAP Update also took account of consultation with business and community groups and information was shared on Commonplace.
- 4.3 The EAP Update also took account of ongoing consultation with the [Residents Advisory Group](#) (RAG) and business and community groups. Building on the Council's longstanding interest in 'deep dialogue', and in citizens' assembly models of deliberative democracy, the Euston RAG brought together a diverse, broadly demographically representative group of 30 adult Camden residents, recruited and randomly selected with help from the Sortition Foundation.
- 4.4 The RAG shared experiences of living in and around Euston and their views about how we can work together to make sure the development of Euston Station and the surrounding area meets the needs of local people.
- 4.4 The first series of six meetings was held between October 2020 and January 2021. Over six two-hour sessions (held online due to the COVID-19 pandemic) the group developed a set of recommendations, to (amongst other things) help directly shape local planning policy, through feeding into the update of the EAP. No previous knowledge or experience of planning or regeneration issue was/is required to participate in the RAG. People who might not normally participate in this kind of activity were actively encouraged to apply and members are given vouchers to thank them for taking part. Members were offered technical support and computer devices, as well as support with childcare or other caring responsibilities, or to meet any specific inclusion or access needs.
- 4.5 A series of themes and recommendations emerged from the RAG, which are available to view in full as part of the ['Recommendations'](#) document. The recommendations were presented to the Euston Partnership Board, made up of all the organisations delivering development at Euston, in spring 2021.
- 4.6 In 2021 a public Call for Sites was carried out consulting via Commonplace on whether there are any additional sites in the Euston area that may have the potential for development (for housing and economic purposes) to include in the Euston Area Plan review. One response was received (for 250 Euston Road).

Part 5: Specific and General Consultation Bodies

- 5.1 This section sets out the specific and general consultation bodies that we have consulted (as stipulated in the Regulations).
- 5.2 These lists are considered largely to be a definitive list of all bodies consulted, not accounting for updates to the consultation database (i.e. requests for amendments/deletion of details) following each consultation stage.
- 5.3 In addition to these general consultation bodies, a number of individual consultees were also consulted at each stage.

Duty to cooperate bodies:

- Neighbouring Authorities: Barnet, Brent, City of London, Haringey, Westminster, Islington
- Environment Agency
- Historic England
- Natural England
- Mayor of London
- Civil Aviation Authority
- Homes and Communities Agency
- Primary Care Trusts established under section 18 of the National Health Service Act 2006 or continued in existence by virtue of that section
- Office of Rail Regulation
- Transport for London
- Local Enterprise Partnership
- Local Nature Partnership

Specific consultation bodies:

- Mayor of London
- The Coal Authority – Have requested us not to consult them as no interests in Camden area
- Environment Agency
- Historic England
- Natural England
- Network Rail Infrastructure Limited
- Transport for London
- Any person to whom the electronic communications code applies by virtue of a direction given under Section 106 (3)(a) of the Communications Act 2003
- Any person who owns or controls electronic communications apparatus situated in any part of the area of the local authority
- Clinical Commissioning Group
- Person to whom a license has been granted under Section 7(2) of the Gas Act 1986
- Person to whom a license has been granted under section 6 (1) (b) or (c) of the Electricity Act 1989
- Sewage undertaker
- Water undertaker
- Homes and Communities Agency
- Metropolitan Police

Euston Specific consultation bodies:

Below are bodies some or all of whose activities benefit near or within any part of the Euston Area Plan area. In addition, a large number of individual addresses were consulted. These included:

- Age UK Camden
- Bayham Place TRA
- Bengali Workers Association
- Bloomsbury Conservation Area Advisory Committee
- Camden Black & Minority Ethnic Alliance
- Camden Carers
- Camden Chinese Community Centre
- Camden Cyclists
- Camden Disability Action
- Camden Federation of Private Tenants
- Camden Leaseholders Forum
- Camden Libraries
- Camden MS Society
- Camden People First
- Camden Peoples Theatre
- Camden Town Unlimited
- Central St Martins
- Christchurch Primary School
- Crick Institute
- Crofters Way TRA
- Cumberland Market TRA
- Curnock TRA
- Edith Neville Primary School
- Euston Mosque
- Fitzrovia Youth in Action
- Fitzrovia Neighbourhood Association
- Godwin and Crowndale Estate Management
- Goldington Estate TRA
- Healthwatch Camden
- High Speed St Pancras
- Indian Spice Shop
- Kings Cross Safer Neighbourhood Team Met Police
- Maria Fidelis School
- Netley Primary School
- New Diorama Theatre
- New Horizon Youth Centre
- NHS
- Nu Life Pharmacy
- Old Diorama Arts Centre
- Parish of Old St Pancras
- Rail Estate
- Regent High School
- Remploy
- Respond
- Richard Cobden Primary School
- Royal College of General Practitioners
- Royal Mail
- Samuel Lithgow Youth Centre

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- Shaw Theatre
- Somers Town Community Association
- St Mary and St Pancras Primary School
- St Pancras Church
- St Pancras Community Association
- Third Age Project
- Training Link Camden
- University College London
- West Euston Time Bank

Part 6: Statement of Fact and Statement of Representations

Euston Area Plan Update Proposed Submission Draft 2026

Statement of Fact and Statement of Representations Procedure

This notice is provided in accordance with Regulation 19 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012.

The Euston Area Plan Update - Proposed Submission Draft is the title of the document which the Council intends to submit to the Secretary of State. The Plan sets out the Council's vision for the development of Euston until 2051 and planning policies and site allocations to help achieve this. It will form the basis for Councils decisions on planning applications and set the framework for future development in the Euston area.

Representation period:

Originally, representations could be made over a six-week consultation period from Friday 9 January 2026 to Sunday 22 February 2026. This was extended on Tuesday 20 January to Tuesday 3 March.

Where to view the documents:

The 'Euston Area Plan Update Proposed Submission Draft 2025', Euston Area Plan Policies Map, Sustainability Appraisal and Consultation Statement are available to view on the Council's website and paper copies of these documents can be viewed at:

- **Square Library**, 5 Pancras Square N1C 4AG
- **Camden Town Library**, 218 Eversholt Street, NW1 1BD

For library details and opening times see: To check library opening hours click here [Library opening times and information - Camden Council](#)

Other documents that support the Euston Area Plan Update Proposed Submission Draft 2026 are available to view on the EAP website eustonareaplan.info/documents

Making a representation:

We would encourage all comments to be made using the representation form. The representation form and further guidance on how to make comments can be downloaded from the Council's website

- [EAP Update - Consultation response form](#) (PDF)
- [EAP Update - guidance on how to make a representation](#) (PDF)

What to consider when making a representation

When making representations on the Euston Area Plan Update Proposed Submission Draft the following questions should be considered:

Euston Area Plan Update - **Regulation 22(1)(c) Consultation Statement**

- **Is the plan legally compliant?** Does the plan comply with the relevant legislation and regulations in the way it has been prepared, and in its content?
- **Does the plan comply with the ‘Duty to Cooperate’?** Has the local planning authority engaged constructively, actively and on an ongoing basis with the plan?
- **Is the plan ‘sound’?** Has the plan been ‘positively prepared’? Is it robustly justified and evidence-led? Will it be effective in what it sets out to achieve? Is it consistent with regional and national planning policy?

Representations can be submitted by:

- **Email:** eustonareaplan@camden.gov.uk
- **Post:** Euston Regeneration team, Camden Town Hall, Judd Street, London, WC1H 8EQ.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Euston Area Plan Update documents, to the Secretary of State and must be made publicly available. All responses must be received by 5pm on 18th February 2026.

For further information regarding how we store and process your data, please view the [EAP Privacy notice](#).

Future notification:

As part of the consultation, you can also request to be notified of any of the following:

- When the Euston Area Plan Update has been submitted for independent examination;
- Publication of the Planning Inspectorate Report; and / or
- Adoption of the Euston Area Plan Update.

Contact the Euston Regeneration Team

If you would like any further information on the Euston Area Plan Update Proposed Submission Draft or any of the supporting documents then please contact us via email at eustonareaplan@camden.gov.uk or by phone on 020 7974 2726.