Euston Area Plan Update
Proposed Submission Draft 2026

Open Space Topic Paper

October 2026

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Introduction

1.1 The Euston Area Plan (EAP) is being updated to ensure that the evidence base for key parts of the plan are revised to reflect the most up to date information, constraints, opportunities and priorities, including ensuring that the EAP is consistent with the updated Local Plan and the latest Government position on the construction of HS2 at Euston. Following informal consultation and engagement, proposed updates to the EAP were published for consultation January 2023. An additional consultation was held in Summer 2024. Regulation 19 consultation was held January - March 2026.

1.2 Proposals for development in the Euston area, will be considered against the policies in the development plan. Camden's development plan is presently comprised of a series of documents including the London Plan, Camden's adopted Local Plan which sets out the Council's planning policies covering the period 2017-2031 which will be replaced by the new Camden Local Plan (once adopted) and which covers the period 2026-41, and the Euston Area Plan (EAP) adopted in 2015 and as updated.

1.2 The Council is in the process of updating the Local Plan. The Council published the Camden Local Plan Proposed Submission Draft for comment in May - June 2025. The draft Plan sets out the Council's vision for future development in Camden over the next 15 years and includes the planning policies and site allocations to help achieve this. The Camden Local Plan Proposed Submission Draft was submitted to the Secretary of State for independent examination on Friday 3 October 2025, with examination hearings taking place in May and June 2026. The Inspector identified a number of Main Modifications to the Plan which are currently the subject of a public consultation (October 2026).

1.3 This topic paper supports Strategic Principle EAP 5: Open Space and Green Infrastructure and the proposals for each of the seven-character areas, 'Places' - Development Principles EAP 1 – EAP 7 of the EAP Proposed Submission Draft. It explains the Council's proposed approach for replacement open space (lost to the HS2 scheme) and the approach to delivering new and enhanced open space and improvements to play and sports facilities in the Euston area. It also explains more generally the approach to open space provision which defer to policies in the Local Plan.

Background

2.1 The HS2 Act establishes a special planning regime for the approval of certain details including the design and external appearance of stations. Camden Council are the determining authority for these approvals (subject to appeal) and the EAP will be material to their determination insofar as it is material to the matter for which approval is sought and having regard to the grounds specified in the HS2 Act for the consideration of that matter.

2.2 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.

2.3 Forming part of the EMRs, there are also 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 and include measures that will help to mitigate the impacts in Camden.

2.4 The importance of open space to the health and wellbeing of local communities is well recognised. HS2 construction has resulted in the permanent loss of St James's Gardens open space as well as half of Hampstead Road open space and part of Euston Square Gardens during the construction period. Overall, the Council calculates that the public open space lost to the HS2 scheme has been approximately 20,000m2.

2.5 The Council's Leisure Service has responsibility for managing, maintaining and improving Camden-owned open spaces. The Service is also a provider, commissioner and promoter of sport and physical activity in Camden with the aim of increasing uptake and sustained participation in physical activity by people of all ages, incomes and backgrounds. The borough's six leisure centres are used by a mix of Camden residents, schools, local clubs and community groups as well as those working and studying in the borough or those who choose to access Camden facilities from neighbouring boroughs.

2.6 Alongside the Council, there is a wide variety of organisations in Camden involved in delivering/enabling sports and physical activity, such as schools, early years providers, sports clubs and the voluntary and community sector (VCS). Funding comes from a variety of sources with the major leisure centres using memberships/admission fees as their main source of income.

2.7 A topic paper on open space and sport has been prepared for the Local Plan examination and should be read in conjunction with this paper. It provides additional information and justification for the Council's proposed approach for protecting and delivering new and enhanced open space, food growing areas and improvements to play and sports facilities in Camden. It highlights the extremely challenging nature of creating new areas of open space, and consequently new outdoor sports facilities in such an urban area where there are many competing demands for space.

2.8 It notes that where the Council has secured new open space through the planning process, in the great majority of cases, this has involved large major schemes, for example the almost-completed King's Cross Central development (on former railway lands). The Euston Station masterplan area offers a similar opportunity and the development of major sites in Euston will be contingent on balancing a range of different planning considerations, such

as optimising different land uses, the provision of housing (in a location with high housing need), and heritage and viability constraints.

2.9 The topic paper explains how the Council will secure additional provision on site or financial payments towards enhancing existing open space and sports facilities within the limitations of the borough's built-up/urban character, given that development sites in the borough are all previously developed. For ease, relevant parts of the paper have been copied, with additional Euston specific context added where relevant.

3.0 Policy Background

National Policy and Guidance

3.1 **National Planning Policy Framework** (NPPF)[1]

The NPPF states that planning policies and decisions: "should plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services…" (paragraph 98).

3.2 It also states that planning policies should be based on "robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision" (paragraph 103).

3.3 Proposals involving the loss of existing open space, sports and recreational buildings and land are expected to either provide an assessment clearly showing that the open space, buildings/land is surplus to requirements or identify equivalent or better provision in terms of quantity and quality in a suitable location. Where the development is for alternative sports and recreational provision, the benefits of this should clearly outweigh the loss of the current/former use (paragraph 104).

London Plan 2021

3.4 Chapter 8 of the adopted London Plan addresses 'Green Infrastructure and the Natural Environment'. Policy G1 states that: "London's network of green and open spaces, and green features in the built environment, should be protected and enhanced". Boroughs are expected to prepare green infrastructure strategies to ensure that green infrastructure is optimised and considered in an integrated way. Development plans should use evidence, including green infrastructure strategies, to identify green infrastructure assets, their function and their potential function and identify opportunities for addressing environmental and social challenges through green infrastructure

[1] The most recent version of the NPPF was published in August 2026, however, transitional arrangements mean that the EAP update will be examined against the December 2024 version of the NPPF.

interventions. The Council is currently working to prepare a Green Infrastructure Strategy in Camden.

3.5 London Plan Policy G3 sets out the approach to protecting 'Metropolitan Open Land' (MOL) and states that any alterations to the boundary of MOL should only be undertaken in "exceptional circumstances when this is fully evidenced and justified". Policy G3 also confirms that it is the role of boroughs to designate MOL on their Policies Map.

3.6 Policy G4 on Open Space states that development plans should undertake a needs assessment of all open space to inform policy, identifying areas of open space deficiency. Plans should also promote the creation of new areas of publicly accessible open space, particularly in areas of deficiency, and ensure that open space remains publicly accessible.

3.7 Policy G5 on Urban Greening sets out that major developments should contribute to urban greening "as a fundamental element of site and building design" with an interim 'Urban Greening Factor' for the whole of London setting out how much urban greening new developments are required to provide.

3.8 Chapter 5 of the London Plan sets out the need for social infrastructure to be protected and enhanced. Policy S4 on Play and informal recreation states that boroughs should prepare needs assessments and strategies relating to children and young people's play and informal recreation facilities, with residential developments expected to provide at least 10sqm of play space per child.

3.9 Policy S5 on Sports and recreation facilities states that boroughs should prepare a needs assessment that considers need at the local and sub regional level. Sites should be secured for a range of sports and recreation facilities. Boroughs should also maintain, promote and enhance networks for walking and cycling. Part C of the policy reiterates the tests set out in paragraph 104 of the NPPF.

Camden Local Plan 2017

3.10 Policy A2 of the **adopted Camden Local Plan 2017** states that the Council will protect, enhance and improve access to Camden's parks, open spaces and other green infrastructure. The policy sets out how the Council will protect open spaces in the borough and sets out how new open space will be secured. The latter sets a standard of 9sqm per occupant for residential schemes and 0.74sqm for commercial and higher education developments.

3.11 Policy A2 is supported by Camden Planning Guidance on Open Space, last updated in January 2021. The guidance sets out further detail on how the Council will establish the type and quantity of open space that should be provided. Worked examples are provided to explain how the amount of open space, and/or a financial contribution-in-lieu will be established.

3.12 Policy A2 also applies to outdoor sports facilities. It seeks to ensure that existing outdoor sports facilities in the borough will be protected and enhanced. Part (i) of the policy states that the Council will consider development of open space for alternative sports and recreation provision "where the needs outweigh the loss and where this is supported by an up-to-date needs assessment".

3.13 Local Plan 2017 Policy C3 addresses indoor sports facilities. It sets out that facilities will be protected unless there is evidence showing that there is no longer a demand. It also sets out the circumstances in which reprovision would be considered, whilst stating this is likely to be 'exceptional' circumstance.

3.14 Delivery has been effective through a combination of mechanisms, particularly:

- Section 106 funding,
- Community Infrastructure Levy (CIL),
- The Green Spaces Investment Programme, demonstrating that planning policy works alongside broader funding streams to improve open space and sports provision.

New Local Plan

3.15 The Draft Local Plan largely continues the existing approach, which has already been found to be sound and has successfully delivered around 30,000 sqm (3 ha) of new open space across 15 schemes, plus over £4.5m in Section 106 contributions and £2.5m of local CIL funding for open space and sports projects.

3.16 The Plan maintains strong protections for open space and sports facilities:

- SC4 covers outdoor sports,
- SC3 covers indoor sports,
- A new SC5 policy supports food growing.

3.17 Existing open space standards are retained, ensuring consistency with previous plans and helping maintain open space per person despite population growth. The Council's approach requires developments to provide open space or financial contributions based on occupancy, helping mitigate pressure from major schemes.

4.0 Supporting Evidence

Euston Open Space study

4.1 Land Use Consultants (LUC) were commissioned by the Council in 2021 to undertake an Open Space Study to support the update of the EAP. The Study

found quantitative shortfalls located within the east and southern areas, with the western area being above the current quantitative standard. The quantity of open space and play space (per resident) is significantly higher in the western area of the EAP boundary area, largely as a result of Regent's Park. However, a notable amount of this area also experiences deficiencies in 'small local' and 'pocket' access to open space.

4.2 The assessment of the quantity of the current open space in the EAP area indicates the study area as a whole is below the existing quantitative standard that would be required by new development (of 9m2 per person) by 1.89m2 per person (it should be noted that this is a comparison against the quantity standard within Camden's open space planning policy for new development and there is no local standard for existing open space).

4.3 It points to ONS data which indicates that around 73% of dwellings around Regents Park Estate, and around 79% of dwellings in Somers Town do not have access to private gardens. This is compared to 39% of all Camden households with no access to private outdoor space and a London average of 21%. This is perhaps unsurprising in a Central London location where the majority of properties are not individual dwelling houses.

4.4 Open space in Euston is important in an area where space is limited and has been lost due to HS2 construction and open space has to meet a wide range of often competing demands. The importance of open space to the health and wellbeing of local communities is well recognised.

Needs Assesment

4.5 The Council has undertaken a sports needs assessment for the Euston Area Plan 2022, while this necessarily focusses on what might be needed to support the additional population at Euston, the study provides a recent assessment of capacity across different types of sports facilities and is borough-wide in scope, reflecting that some facilities will have a wider catchment area.

4.6 Evidence suggests that there is adequate total supply of indoor sports facilities across the borough but that there is uneven distribution of facilities – with several large facilities (sports halls and pitches) in the less densely developed northern parts and multiple gyms and studios serving the CAZ in the South. The Euston area is particularly poorly served.

4.7 The Euston Area Sports Facilities Needs Assessment and Euston Open Space Study suggests that there is an unmet demand for accessible sports halls with adequate indoor pitches (4-court); high-quality outdoor sports provision; and more localised gym and studio provision. This study also suggests that facilities across Regents Park estate and Somers Town are of a lower quality.

4.8 Sport England responded to the Regulation 19 consultation to highlight that since the Regulation 19 consultation, the Council has completed. This study

aims to evaluate the capacity of existing community and social infrastructure - including, sports, and open space provision - against current needs and future demand. It establishes a baseline of existing provision and uses a data-driven approach to benchmark this against a projected growth scenario to understand the infrastructure required over time.

4.9 The study identifies shortages including indoor and outdoor sports provision public parks, play space and certain cultural leisure uses. Green space and play provision are structurally constrained. Whilst quantitative sufficiency of Green space varies considerably, depending on whether Regent's Park is considered within the boundary, there is a clear, deficit of integrated green space and play provision at a neighbourhood level. The loss of open space associated with HS2 further increases pressure, reinforcing the need for accessible, community-scale green infrastructure.

4.10 As has been widely documented elsewhere, the pandemic and cost-of-living crisis have has impacted the financial sustainability of indoor sports facilities, due to increased energy bills and changes to working patterns. It will be important to work with providers to support the 'recovery' and long-term sustainability of these facilities as well as supplementing them with new facilities where necessary. The same challenges that limit the ability to deliver new open spaces in Euston also apply to delivering outdoor sports facilities. These uses are challenging to deliver, given that they tend to be lower-value uses and the challenge is intensified by the area's dense urban context, high land values, limited development capacity, the previously developed nature of much of the land and in places the challenging viability position.

4.11 Which sports are supported and how physical activities are delivered are matters which are largely outside of the Local Plan process (and in some cases no planning application will be required), and will 'shaped' in line with consultation with existing users of facilities and local residents. As stated earlier, the Council's Leisure Service, through working with relevant partners, has a comprehensive understanding of where needs in the borough exist and this information is used to inform refurbishment/enhancement proposals involving existing provision.

Mitigation: HS2 Act and environmental statement

4.12 The Environmental Statement for HS2 which covers the Euston area Volume_2_CFA_1_Euston_Station_and_Approach.pdf seeks to present the likely significant effects of the construction and operation of Phase One of HS2 (referred to throughout the ES as the 'Proposed Scheme') on the environment within CFA1 (Euston – Station and Approach). The report describes the mitigation measures that are proposed for the purpose of avoiding, reducing, or managing the likely significant adverse effects of the Proposed Scheme on the environment within CFA1.

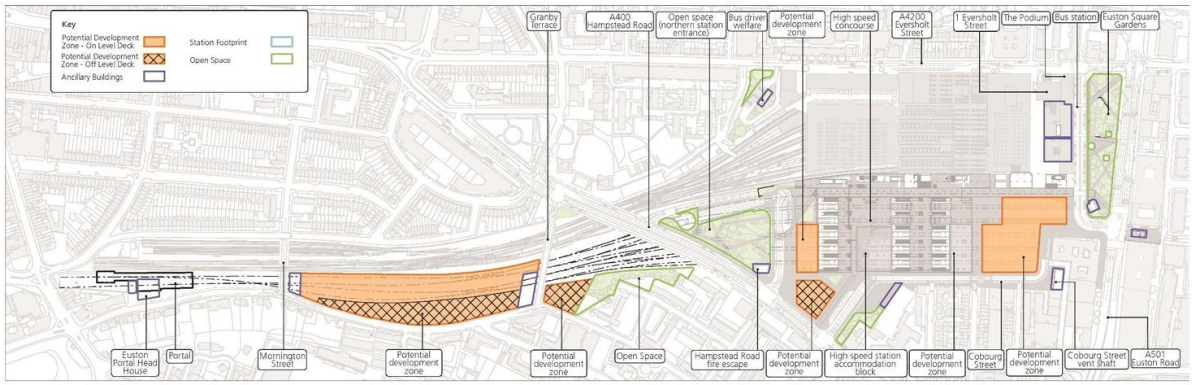
4.13 SES2 and AP3 ES Volume 2 – CFA1 Euston Station and Approach GF0-4a.dotm AP3 Euston CFA1 Report for HS2 D3 24072015 Latest version provides an update to the proposed scheme and was considered by Parliament as part of the Act making process including as part of the petitioning process.

4.14 The report states that *"Each environmental topic section comprises: an introduction to the environmental topic; a description of the environmental baseline within the area; the likely significant environmental effects arising during construction and operation of the revised scheme for the Euston station and approach area and proposed mitigation measures for any significant adverse effects."*

4.15 The update to the ES includes a description of 'Changes in the planning policy context at Euston' which was updated following the adoption of the EAP. The report notes that **"***The adopted EAP provides a comprehensive strategic vision for the redevelopment and wider regeneration of the Euston area, including the high speed and the conventional station. It is based on achieving 11 strategic objectives, which include objective 3 'making the best use of the new space above the station and tracks and opportunities for regeneration in the wider area'. The development principles in the EAP include promoting 'comprehensive commercially led mixed-use development above and around the new and existing stations'."* It also highlights "HS2 Ltd's commitment to ensuring that the scheme at Euston will help facilitate the delivery of the wider vision in the adopted EAP."

4.16 In paragraph 3.3.21, the report notes that *"the permanent loss of open space in the revised scheme is the same amount as in the original scheme, while the intended replacement will be an improvement over the original scheme*" and in figure 6 (copied below), a plan was provided showing the extent of open space, potential OSD development plots and the location of ancillary buildings outside the main station footprint included in the revised scheme.

Figure 6: Revised scheme – open space, potential development zones and ancillary buildings



4.17 Paragraphs 5.2.32 – 5.2.33 provide further detail on proposed mitigation for the open space lost, including stating that:

- *"New public open space will be created at the northern end of the Regent's Park Estate, between the railway and Langdale. It will incorporate land that is at present part of Hampstead Road Open Space, Eskdale play area and other land on the Regent's Park Estate. The space will include grass, planting, children's play areas and a multi-use games area (MUGA). Improvements will also be made to the open space within the Ampthill Square Estate, once utility works have been completed in this area. These improvements may include the provision of play facilities.*
- *The area currently occupied by St James's Gardens will form a new entrance – Cobourg Street station entrance – and forecourt to the high speed station, with some public realm. The majority of the local features of St James's Gardens will be reprovided in two stages after construction on a site in the north-east of the Regent's Park Estate: the proposed open space north of Langdale (see SES2 and AP3 ES, Volume 2 CFA1 Map Book, Map CT-06-001). This will include a MUGA, children's play area, landscaped areas and benches. The new areas of open space are further north than the original St James's Gardens but will remain accessible to residents in Regent's Park Estate. Although the reprovided open space north of Langdale is smaller than the total area lost from St James's Gardens, the main community facilities such as the MUGA and playground will be incorporated. The impact of the loss of these facilities throughout construction Stage A will be a major adverse effect and is significant.*
- *Hampstead Road Open Space is located on the west side of Hampstead Road, to the south of Silverdale. The area contains a children's playground, benches and a lawn area and is on land required to construct and operate the revised scheme. Although the users of this resource are mostly those living in adjacent residential blocks that will be demolished, there is still likely to be a demand for this open space and play area, as there are limited nearby alternatives. The children's playground will be reprovided in the proposed open space north of Langdale at the end of Stage A. The loss of the Hampstead Road Open Space is a major adverse effect on the community and is significant.*
- *The nearby Eskdale play area is also on land required to construct and operate the revised scheme. This is a children's playground and green space between the residential blocks of Eskdale and Langdale in the Regent's Park Estate (between Stanhope Street and Harrington Street). The playground has children's climbing frames and swings, is surrounded by mature trees and has several benches. The playground and open space serve the people living in the surrounding residential blocks. Similar facilities will be reprovided in the proposed open space north of Langdale. The loss of this resource will result in a major adverse effect on the community and is significant."*

Camden Infrastructure Delivery Plan (IDP), October 2025

4.18 The Council has prepared an Infrastructure Delivery Plan (IDP), which takes a topic-based approach setting out how different types of infrastructure will be delivered and identifies both planned/'committed' infrastructure and potential

future needs. It has been developed with input from Council services and incorporates comments made by relevant external bodies during the Local Plan consultation process.

4.19 The IDP incorporates sections on 'Green Infrastructure' and 'Sports and Physical Activity'. It acknowledges the critical role of the Council's 'Green Spaces Investment Programme' in identifying and progressing projects to improve parks in the borough and amenity space on housing estates. Part of the Green Spaces Investment Programme has involved the delivery of 'mitigations' to offset the impact of the emerging High Speed Two construction programme in the Euston area as well as the greening of highways land working with Council Highways colleagues.

4.20 In selecting projects, the Council is able to draw upon data and knowledge from multiple sources including its role as manager of many open spaces and regular engagement with local groups and community organisations, such as the Friends of Parks groups. The Council also shares, and contributes funding towards, the maintenance of greenspace datasets managed by Greenspace Information for Greater London (GIGL), the London Environment Records Centre. This includes information about the availability of different types of open space and the location of deficiency areas (i.e. where residents have more limited access to open space).

4.21 The IDP identifies the different ways in which the Council is working with partners to improve access to, and reduce barriers to participation in sports and physical activity. This places particular emphasis on increasing informal, 'doorstep' provision and, where appropriate, targeted interventions for population groups where participation is recognised to be lower. It involves delivering activities in places where residents already go, such as parks and schools, and does not necessarily require the provision of new physical infrastructure or even buildings for their delivery. The Euston Social and Community Infrastructure study helps to establish priorities for the Euston area combining qualitative and quantitative assessments, its recommendations echo those of the IDP and include supporting existing community provision, integrating small-scale flexible provision new developments and looking beyond the EAP boundary to help meet some of the shortfall.

5.0 Euston Area Plan approach and justification

Open space provision in the EAP

5.1 The EAP Update, Proposed Submission draft (pg. 109) retains the wording from the EAP 2015 (pg. 65) which states that "*Mitigation for the open spaces lost is considered to be a key strategic priority in planning for future open space provision in the area, and should be calculated separately to any requirements for open space and biodiversity provision generated by new*

development and replacement housing which should be delivered in line with Development Plan policies…

New open spaces should be provided as part of new development, in accordance with Camden and London Plan policy. The first priority will be the provision of the maximum reasonable on-site public open space and appropriate green infrastructure."

5.2 In line with the NPPF, London and Local Plan policies, the site allocations would not result in the loss of open space or sport and recreation facilities; policies in the Development Plan seek to protect existing uses and they make provision for onsite open space where possible. Figure 3.3 of the EAP Update proposed submission draft, illustrates how a network of open space could be delivered, including the re-provision of open space lost to HS2.

Re-provision of open space and biodiversity value lost as a result of HS2

5.3 HS2 construction has resulted in the permanent loss of St James's Gardens open space as well as half of Hampstead Road open space and part of Euston Square Gardens during construction. Overall, the Council calculates that the public open space lost to the HS2 scheme (on a permanent and long term temporary basis) has been approximately 20,000m2. The amount of re-provided open space included as part of the update to the ES was approximately 17,150m2, a shortfall equivalent to 11 tennis courts. Nevertheless, the Council when accepting the assurances offered, including funding for improvements to existing open spaces, considered that collectively the mitigations offered, of which the open space re-provision was a key part, could help to address loss of the open spaces.

5.4 Alongside the individual assurances offered to the Council, there are a number of Undertakings and Assurances in place and made by the Secretary of State in relation to the High Speed Rail (London to West Midlands) Act 2017 more generally. They form part of the EMRs and include measures that will help to mitigate the impacts in Camden.

5.5 Paragraph 1.1.1 of High Speed Rail London – West Midlands) Environmental Minimum Requirements General principles states that *"It is the intention of the Secretary of State to carry out the project so that its impact is as assessed in the ES. The Secretary of State will require the nominated undertaker to adhere to the arrangements provided for in the Environmental Minimum Requirements (EMRs) in designing and constructing the Phase One of High Speed Two Works."*

5.6 The EAP Update, Proposed Submission draft includes commentary on the re-provision of open space, biodiversity, habitat provision, sports, play and recreation facilities, monuments/statues and other features lost as a result of HS2 at St James's Gardens (a Site of Importance for Nature Conservation), Euston Square Gardens and Hampstead Road open space.

5.7 Given the identified loss in an area with an identified need for open space, the Council considers that the amount of open space re-provided by HS2 should be at a similar level to that reported in the ES. The amount of re-provided open space shown in the ES should therefore be the reference point for the re-provision of open space.

5.8 In their response to the Regulation 19 Proposed submission draft consultation, HS2 Ltd. requested amendments to the description of the re-provision of open space with reference HS2 Ltd.'s assurance letter of February 2016 to LB Camden. Following further discussions with HS2 Ltd. modifications are proposed to the commentary as follows, which aim to set out the position more clearly.

*The Council considers that the levels of open space re-provision shown in the Environmental Statement (ES) (**as amended)** accompanying the **High Speed Rail (London – West Midlands)*** ~~*2*~~ *Act **2017** ~~**nd** subsequent updates~~) **"the HS2 Act")** should be the **reference point for the** ~~minimum~~ quantum of open space ~~that can be~~ provided by **the** HS2 **scheme** as mitigation. As part of the assurances provided to the Council, HS2 Ltd states that its aims are to ensure that replacement and enhanced open space is at least equivalent to the open spaces to be lost in terms of quantity and quality, and is in a suitable location**, the commitment provided by the Secretary of State requires HS2 Ltd to "actively engage with the London Borough of Camden to ensure the provision of high quality permanent replacement open space and play space within the design for the authorised works in the London Borough of Camden in so far as is reasonably practicable within the limits of the Bill and without impacting the timely and economic delivery of the railway."**. At the time of the schedule 17 submission for the station, it will be important to understand how HS2 propose to mitigate, in perpetuity, the open space lost to the scheme. **The Council's expectation is that r**eplacement open space **should seek to meet the needs of local communities**, be provided as close to the original location as possible, **at grade, accessible and with appropriate landscaping.***

The ES showed the bulk of the replacement open space being provided in an area to the north of the station, on newly created "land" above the railway tracks. These northern gardens, along with additional open space on the edge of railway land at Regents Park Estate and a pocket of open space close to the site of the Former National Temperance Hospital, combine to largely make up for the amount of open space lost at St James' Gardens. The ES also outlined the re-instatement of Euston Square Gardens following its use as a construction compound.

*Following subsequent design development and the need to find a more affordable HS2 station design, it is understood that the open space proposed in the area to the north of the station, on newly created land above the railway tracks is no longer part of **the** HS2~~'s~~ proposals. ~~An alternative location for re-provided open space will need to be found,~~ notwithstanding the reduction in available space and the Government's change in approach to funding the*

*station at Euston**, the nominated undertaker will need to demonstrate that it has provided all reasonable mitigation for the effects of the HS2 scheme, including those on open space.***

The site wide open space strategy should look to accommodate as much open space as is feasible in the context of the spaces lost, the commitments made by the Secretary of State, and site constraints, after which alternative locations will need to be explored.

Indicative locations for open spaces are shown on Figure 3.12. Open Space network illustration and further detail is provided in Chapter 4, Places.

*Mitigation for the open spaces lost is considered to be a key strategic priority in planning for future open space provision in the area, and should be calculated separately to any requirements for open space and biodiversity provision generated by new development and replacement housing which should be delivered in line with Development Plan policies. Any requirements for open space and biodiversity provision generated by new development should be considered holistically alongside any HS2 **Act** mitigation requirements to provide open space to contribute toward the objectives of the EAP. ~~Replacement open space should be provided as close to the original location as possible Replacement open space must be at least equivalent to the open spaces to be lost in terms of quantity, quality and location and:~~*

- ~~*Should be on or around Euston Station site;*~~
- ~~*At least equivalent floor area to Environmental Statement provision; and*~~
- ~~*At-grade, accessible, with appropriate landscaping.*~~

To help mitigate the temporary loss of open space associated with the construction of HS2, support will be given to the positive use of any vacant spaces for temporary open space uses, such as food growing/ allotments, play space and temporary public open space.

Meeting the needs of new development

5.9 EAP Update Strategic Principle EAP 1 Part E: highlights the need for new development to provide social infrastructure in accordance with Local Plan policies. Proposed modifications add specific reference to sports facilities as part of this.

5.10 The principle states that in order to inform the appropriate type and scale of facilities, an application for the Euston Station masterplan area will be expected to submit a Community Strategy that sets out how appropriate Social Infrastructure will be conceived and allowed to develop over time.

5.11 Strategic Principle EAP 5: Open Space and Green Infrastructure part A states that: *Development proposals should support 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. An enhanced green infrastructure network, including new and improved open spaces, retention of existing trees where possible, green streets with extensive tree planting and other public realm, green roofs and walls will be developed to [amongst other things]: *Contribute to health and wellbeing and provide amenity value for residents, visitors and workers."*

5.12 The EAP Update recognises that it may be challenging for some constrained urban sites to meet the full open space needs generated by new development, in particular those that are affected by transport infrastructure requirements or estate regeneration constraints. Therefore, a joined up, innovative approach will be required that maximises overall provision, for example through creating open spaces from lesser used roads and walkways, and decking areas of railway track to provide new open space. Where the full open space needs cannot be met on-site, developments will be expected to contribute towards any remaining open space requirement in line with Local Plan policies

5.13 The EAP Update highlights that ***"****Open spaces should have different functions, including offering elements of tranquillity, space to meet others, improve health, access nature, support biodiversity and promote play. The location should support the function, ensuring the space is well connected to routes, linking existing and new communities. In meeting the needs of residents, particular regard should be given to provision of play space, spaces for young people and creating opportunities for exercise, socialising and fostering health and wellbeing."*

5.14 It also states that *"priority should be given to providing free "accessible to all" sports pitches. A few bookable play spaces (such as payable sports courts) can be placed within open spaces so long as their placement, purpose and impact do not detract from the space's primary purpose. The overall provision will need to be considered as part of the wider Open Space Provision as part of the Public Open Space and Green Infrastructure Strategy and Management Plan."*

5.15 Section 5.7 Planning Benefits for Euston, of Chapter 5 of the EAP Update Proposed Submission draft highlights that planning obligations will be used to support the delivery of Cultural and leisure infrastructure, including sports and physical activities.

Proposed Modifications

5.20 In response to responses to the Regulation 19 consultation, proposed modifications are set out in appendix one which:

- Add a specific reference to sport and physical activity to Strategic Principle EAP 1 Part E: Social Infrastructure being provided as part of the

community infrastructure to support new development in accordance with Local Plan policies; pg. 45 and to supporting text on page 60
- Amendments to the supporting text to Strategic Principle EAP 5: Open Space and Green Infrastructure which provides some further commentary on HS2 Undertakings and assurances
- Addition to all site allocations to highlight that they will be expected to contribute to open space in in accordance with open space policy in the Local Plan, with reference to the Open Space study which supports this Plan (noting identified shortfalls) and the illustrative open space masterplan in figure 3.12 of the EAP Update Proposed Submission draft
- Addition to Strategic Principle EAP 5: Open Space and Green Infrastructure, Open Space and Green Infrastructure Strategy and Management Plan to highlight hat the strategy should look beyond land ownership and consider open spaces in the Plan area as appropriate.

6.0 Conclusion

6.1 The borough's urban character means that it is extremely challenging to create new areas of open space, and consequently new outdoor sports facilities, the re-provision of open space lost to HS2 is a crucial element of meeting identified need and to HS2 delivering the scheme in line with the effects described in the ES.

6.2 Increasing access to sports and physical activity depends, upon optimising the use of existing facilities, including 'shared use' agreements with landowners such as schools, which the Development Plan supports alongside the provision of new facilities where feasible. This includes the repurposing of existing amenity areas within housing estates or other council properties.

6.3 In delivering open space and sports and recreation facilities at Euston, further detailed design and development work will be required to understand to what extent:

- open spaces can support formal/informal outdoor leisure provision and what type.
- Existing facilities can be supported and improved
- New facilities can be delivered with Local institutions
- Creative provision can be integrated into development
- Access can be improved to spaces and facilities outside the EAP area.

6.4 The framework for mitigating the impact of development on existing open spaces and sports facilities contained in the adopted Local Plan which is continued in the submitted draft Local Plan has been working well over many years and has contributed to enhanced open space and facilities where they are most needed, and in accordance with the statutory tests for seeking planning obligations.

6.5 The draft policies of the EAP Update combine strong protections for existing open space and sport facilities whilst identifying where the most realistic opportunities are for delivering new provision as demonstrated in figure 3.1 of the EAP update.

The proposed modifications[2] are set out below (suggested additions in **bold**, deletions as ~~strikethrough~~).

Policy	Paragraph or Figure	Change	Reason
Strategic Principle EAP 1	Part E: Social Infrastructure, pg. 45	Add reference to sport and physical activity to text, proposed mod as follows: E: Social infrastructure • Education, health, **provision for sport and physical activity** and other social and community infrastructure should be provided to support new development, reflecting local priorities and need in accordance with Local Plan policies. This should include opportunities for culture which provides opportunities that are rich, interactive, accessible and attractive to the whole community, complementing and building on the existing cultural heritage of the area.	Clarity
Strategic Principle EAP 1	Pg.60, section 2	Add **'and sporting'** to penultimate para so reads as follows: Development will be expected to make appropriate contributions towards the improvement, maintenance and (where appropriate) expansion of existing community **and sporting** facilities and services in order to address additional needs reflecting London Plan and Camden planning policies.	Clarity
Strategic Principle EAP 5: Open Space	Pg.108 & Pg. 109	The Council considers that the levels of open space re-provision shown in the Environmental Statement (ES) (**as amended)** accompanying the **High Speed Rail (London – West Midlands)** ~~2~~	HS2 comments (also submitted by landowners) –

[2] *These modifications fall within the scope of para.1.5 of the PINS Guidance and are not being submitted as part of the Submission Plan for examination. They are modifications which have been negotiated to address issues raised in response to the Regulation 19 consultation and which the Council is content to make subject to the Inspector concluding that they are necessary for soundness and should form Main Modifications to be consulted on in due course.*

and Green Infrastructure		Act **2017** ~~**nd subsequent updates**~~) **"the HS2 Act")** should be the **reference point for the** ~~minimum~~ quantum of open space ~~that can be~~ provided by **the** HS2 **scheme** as mitigation. As part of the assurances provided to the Council, HS2 Ltd states that its aims are to ensure that replacement and enhanced open space is at least equivalent to the open spaces to be lost in terms of quantity and quality, and is in a suitable location**, the commitment provided by the Secretary of State requires HS2 Ltd to "actively engage with the London Borough of Camden to ensure the provision of high quality permanent replacement open space and play space within the design for the authorised works in the London Borough of Camden in so far as is reasonably practicable within the limits of the Bill and without impacting the timely and economic delivery of the railway."**. At the time of the schedule 17 submission for the station, it will be important to understand how HS2 propose to mitigate, in perpetuity, the open space lost to the scheme. **The Council's expectation is that r**eplacement open space **should seek to meet the needs of local communities**, be provided as close to the original location as possible, **at grade, accessible and with appropriate landscaping.** The ES showed the bulk of the replacement open space being provided in an area to the north of the station, on newly created "land" above the railway tracks. These northern gardens, along with additional open space on the edge of railway land at Regents Park Estate and a pocket of open space close to the site of the Former National Temperance Hospital, combine to largely make up for the amount of open space lost at St James' Gardens. The ES also outlined the re-instatement of Euston Square Gardens following its use as a construction compound.	clarifies the relationship to the HS2 Act, including wording from the commitment provided by the Secretary of State.

		Following subsequent design development and the need to find a more affordable HS2 station design, it is understood that the open space proposed in the area to the north of the station, on newly created land above the railway tracks is no longer part of **the** HS2~~'s~~ proposals. ~~An alternative location for re-provided open space will need to be found,~~ notwithstanding the reduction in available space and the Government's change in approach to funding the station at Euston**, the nominated undertaker will need to demonstrate that it has provided all reasonable mitigation for the effects of the HS2 scheme, including those on open space.** The site wide open space strategy should look to accommodate as much open space as is feasible in the context of the spaces lost, the commitments made by the Secretary of State, and site constraints, after which alternative locations will need to be explored. Indicative locations for open spaces are shown on Figure 3.12. Open Space network illustration and further detail is provided in Chapter 4, Places. Mitigation for the open spaces lost is considered to be a key strategic priority in planning for future open space provision in the area, and should be calculated separately to any requirements for open space and biodiversity provision generated by new development and replacement housing which should be delivered in line with Development Plan policies. Any requirements for open space and biodiversity provision generated by new development should be considered holistically alongside any HS2 **Act** mitigation requirements to provide open space to contribute toward the objectives of the EAP. ~~Replacement open space should be provided as close to the original location as possible~~	

		~~Replacement open space must be **and be** at least equivalent to the open spaces to be lost in terms of quantity, quality and location and:~~ ~~2 Should be on or around Euston Station site;~~ ~~3 At least equivalent floor area to Environmental Statement provision; and~~ ~~4 At-grade, accessible, with appropriate landscaping.~~ To help mitigate the temporary loss of open space associated with the construction of HS2, support will be given to the positive use of any vacant spaces for temporary open space uses, such as food growing/ allotments, play space and temporary public open space.	
Strategic Principle EAP 5: Open Space and Green Infrastructure (all site allocations)	Infrastructure requirements	Proposed to add following text to all site allocations in infrastructure section: **Contributions to open space should be made in accordance with open space policy in the Local Plan, with reference to the Open Space study which supports this Plan (noting identified shortfalls) and the illustrative masterplan in figure 3.12**	Clarity
Strategic Principle EAP 5: Open Space and Green Infrastructure	Open Space and Green Infrastructure Strategy and Management Plan	The Strategy should detail the size, typology, character and function of the spaces, access routes, links between spaces and justify the appropriateness of relationship between public open spaces and adjacent built conditions and uses. It should demonstrate how the open space proposal has identified user groups, and how the quanta, location and character of spaces meet the open space objectives detailed in this chapter. **It should look beyond land ownership and consider open spaces in the Plan area as appropriate.**	Somers Town Neighbourhood Forum – clarification