

<b>LONDON BOROUGH OF CAMDEN</b>	<b>WARDS:</b> Bloomsbury, Camden Town, Regents Park, St Pancras & Somers Town
Euston Area Plan Update (SC/2024/31)	
<b>REPORT OF</b> Cabinet Member for Planning and a Sustainable Camden	
<b>FOR SUBMISSION TO</b> Cabinet Council	<b>DATE</b> 12 <sup>th</sup> November 17 <sup>th</sup> November
<b>STRATEGIC CONTEXT</b>  <p>We Make Camden is the Council’s joint vision for the borough, developed in partnership with our community. The Update to the Euston Area Plan (EAP) is intended to reflect changing circumstances at Euston and to ensure that policies and evidence are robust, reflecting up to date information, constraints and opportunities. Ensuring that the Plan and its evidence base is up to date will be crucial in helping to deliver our ‘We Make Camden ambitions’.</p> <p>The EAP and the proposed updates include a number of strategic and cross-cutting policies which seek to create the conditions to deliver on a number of our We Make Camden ambitions, including contributing to a strong, sustainable, and inclusive local economy; creating safe, strong and open communities where everyone can contribute; good health, wellbeing and connection for everyone so that they can start well, live well, and age well; Everyone in Camden should have a place they call home and green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency.</p> <p>The first of the Plan’s nine objectives is Prioritising local people’s needs, to ensure that development provides new housing (including affordable housing) and supporting community infrastructure, and policies set out the ambition to deliver more housing and affordable homes, which will help to deliver the ambition that <i>Everyone in Camden should have a place they call home</i>. Another of the Plan’s objectives seeks to boost the local, wider London and national economy by reinforcing existing assets and facilitating positive change in the knowledge quarter inclusive innovation district, supporting new and exiting businesses and securing significant new opportunities for local people, in order to meet this objective, the Plan has policies promoting an inclusive economy, which will contribute towards the We Make Camden ambition that <i>Camden’s local economy should be strong, sustainable, and inclusive</i>.</p> <p>The Plan also includes policies on responding to the climate emergency, open space, biodiversity, and prioritising walking, wheeling and cycling; which will contribute towards the ambition that <i>Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency</i>.</p>	

Additionally, the Plan includes policies on achieving design excellence, improving health and well-being, access for all, and the provision and protection of community and cultural facilities, which will help to achieve the ambitions that *Camden tackles injustice and inequality, creating safe, strong and open communities where everyone can contribute* and that *Camden communities support good health, wellbeing and connection for everyone*. The Plan also supports the We Make Camden missions of young people, food, and estates and neighbourhoods with specific policies which provide more detailed policy requirements for the 'Places' around Euston.

## **SUMMARY OF REPORT**

This report seeks approval of the Euston Area Plan (EAP) Update Proposed Submission Draft (as set out in Appendix A) for publication for representations on the Soundness of the document and subsequent submission to the government for public examination. This follows consultation and engagement on the proposed updates to the EAP in 2023 and supplementary engagement in Summer 2024 to show a direction of travel following various Central Government announcements in relation to Euston. The responses to both consultations have been taken into consideration in the proposed submission draft.

Under the Council's Constitution, formulating the Council's overall policy objectives and priorities, which includes development plan documents such as the EAP, is a matter reserved for collective Cabinet decision. The functions of full Council include approving the policy framework, which includes the development plan.

## **Local Government Act 1972 – Access to Information**

The following document(s) have been used in the preparation of this report:

Euston Area Plan Update Proposed Submission Draft  
Equality Impact Assessment of the EAP Proposed Submission Draft  
Euston Area Plan Policies Map  
Sustainability Appraisal of the EAP Proposed Submission Draft

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The **Cabinet**, having had due regard to the Equality Impact Assessment in Appendix B, the results of consultation set out in Appendix C, and having had due regard to the obligations set out in section 149 of the Equality Act 2010, is asked to:

- 1) Recommend to Council that the Euston Area Plan Proposed Submission Draft (set out in Appendix A) and Policies Map (set out in Appendix D) should be approved for submission to the government for examination subject to the following recommendations:

- (i) the Council delegate authority to the Executive Director Investment, Place and Opportunity, following consultation with the Cabinet Member for Planning and a Sustainable Camden, to make minor changes to the Euston Area Plan Proposed Submission Draft and Policies Map prior to publication for Regulation 19 Consultation as required, including factual updates, corrections and non-material wording changes and changes to the reflect updated technical professionally assessed viability information.
  - (ii) the Council delegate authority to the Executive Director Investment, Place and Opportunity, to publish the Euston Area Plan Proposed Submission Draft and Policies Map for Regulation 19 Consultation and following consultation with the Cabinet Member for Planning and a Sustainable Camden submit any proposed modifications to the Euston Area Plan Proposed Submission Draft and Policies Map as required in response to the Regulation 19 consultation to the Planning Inspector for consideration in examination.
- 2) Recommend the Council delegate authority to the Executive Director Investment, Place and Opportunity, following consultation with the Cabinet Member for Planning and a Sustainable Camden, to make appropriate changes to the Euston Area Plan Proposed Submission Draft, Policies Map and supporting documents during the public examination, in response to objectors' submissions, national policy changes or requests from the Planning Inspector.

The **Council** having had due regard to the Equality Impact Assessment in Appendix B, the results of consultation set out in Appendix C, and having had due regard to the obligations set out in section 149 of the Equality Act 2010, is asked is asked to:

- 1) Approve the Euston Area Plan Proposed Submission Draft (set out in Appendix A) and Policies Map (set out in Appendix D) for submission to the government for examination subject to the following delegations:
  - (i) delegate authority to the Executive Director Investment, Place and Opportunity, following consultation with the Cabinet Member for Planning and a Sustainable Camden, to make minor changes to the Euston Area Plan Proposed Submission Draft and Policies Map prior to publication for Regulation 19 Consultation as required, including factual updates, corrections and non-material wording changes and changes to the reflect updated technical professionally assessed viability information.
  - (ii) delegate authority to the Executive Director Investment, Place and Opportunity, to publish the Euston Area Plan Proposed Submission Draft and Policies Map for Regulation 19 Consultation and following consultation with the Cabinet Member for Planning and a Sustainable Camden submit any proposed modifications to the Euston Area Plan Proposed Submission Draft and Policies Map as required in response to

the Regulation 19 consultation to the Planning Inspector for consideration in examination.

- 2) Delegate authority to the Executive Director Investment, Place and Opportunity, following consultation with the Cabinet Member for Planning and a Sustainable Camden, to make appropriate changes to the Euston Area Plan Proposed Submission Draft, Policies Map and supporting documents during the public examination, in response to objectors' submissions, national policy changes or requests from the Planning Inspector.

Signed: David Burns, Executive Director Investment, Place and Opportunity

Date:

A handwritten signature in dark ink, appearing to read 'Dan', followed by a long, sweeping horizontal line that extends to the right.

## **1. CONTEXT AND BACKGROUND**

- 1.1. The Council has consistently promoted the comprehensive redevelopment of the existing Euston Station in line with the Euston Area Plan (EAP) which outlines the growth potential and the opportunity to create a quality place that delivers for existing and new communities alike, in and around Euston.
- 1.2. The EAP was jointly developed by Camden Council, the Greater London Authority (GLA) and Transport for London (TfL). Camden Council adopted the EAP in January 2015 as part of the Local Plan. The Mayor of London adopted the EAP as supplementary planning guidance to the London Plan in January 2015.
- 1.3. Since the adoption of the EAP in 2015, the context has changed, the High Speed Rail (London – West Midlands) Act 2017 (“the HS2 Act”) has authorised construction of the first phase of HS2, however despite construction commencing, in 2023 the Government paused this to allow a review of station designs due to escalating costs and have announced the intention to secure private finance to deliver HS2 at Euston. The wider context and Council priorities have also evolved, including Camden’s Climate Action Plan and the Euston Social Value Charter. The Council has also consulted on an updated Local Plan (Camden Local Plan Proposed Submission Draft) in Summer 2025.
- 1.4. The National Planning Policy Framework (NPPF), requires that policies in local plans and spatial development strategies are reviewed at least every five years and updated as needed. Given the changes since 2015, 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.
- 1.5. The EAP is being updated to ensure that the evidence base for key parts of the plan are revised to reflect the most up to date information, constraints, opportunities and priorities, including ensuring that the EAP is consistent with the updated Local Plan and the latest Government position on the construction of HS2 at Euston.
- 1.6. Proposals for development at Euston will be assessed against Camden’s existing Development Plan, which is comprised of a series of documents that include the London Plan, the Camden Local Plan, and the Euston Area Plan (EAP) adopted in 2015.
- 1.7. The draft Local Plan includes a policy for the Euston Area (Policy S2), to provide an overarching policy context to support the Euston Area Plan. Whilst the Council’s original intention was to submit both Plans for examination at the same time, due to the uncertainty and delays at Euston this has not been possible and the EAP update is now running behind the Local Plan.
- 1.8. More information about the development plan, neighbourhood planning and supplementary planning documents can be found on the Council’s website at [www.camden.gov.uk/planningpolicy](http://www.camden.gov.uk/planningpolicy)

- 1.9. Under the Council's Constitution, the General Matters reserved for collective Cabinet decision include formulating the Council's overall policy objectives and priorities, including development plan documents, recommending them to full Council for approval where appropriate. The functions of full Council include approving or adopting the policy framework, which includes the development plan. Under the Local Authorities (Functions and Responsibilities)(England) Regulations 2000, decisions to approve development plans for submission for examination must be made by full Council.
- 1.10. A new system for preparing local plans is being introduced through the Levelling Up and Regeneration Act. This would increase central government control over the local plan process and reduce councils' autonomy in preparing their plans. For the review of the Euston Area Plan to be progressed under the current system, it must be submitted for examination before December 2026.

## **2. PROPOSAL AND REASONS**

- 2.1. The EAP Update Proposed Submission Draft (attached as Appendix A) has been prepared taking into consideration the comments made during the consultation and engagement on the proposed updates to the EAP (see section 5 and Appendix C), the evidence studies commissioned to support the Plan, national planning policy, the London Plan, and We Make Camden and other relevant Council plans and strategies.
- 2.2. As much of the development capacity is on land created by the redevelopment of the stations and tracks, we have also worked with delivery organisations and transport bodies to understand that latest proposals for Euston. Work is ongoing to improve integration at Euston between the construction of the HS2 central London terminus and improved onward connections, Network Rail's redevelopment of the mainline station; the redevelopment of the London Underground station and the wider development of the urban environment managed by the Master Development Partner, Lendlease.
- 2.3. At the time of writing, 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. While this approach is welcomed, it does mean that there is less certainty around station designs, costs and timescales which means that updates to the Plan must provide enough flexibility for future design development.

### *Central Government*

- 2.4. The government's 10 Year Infrastructure Strategy outlines plans to establish a Euston Delivery Company to lead private investment and development at Euston Station, working with Camden Council and the GLA to grow a commercial and life sciences hub, deliver affordable housing, and support regeneration. The Strategy also highlights the potential for the Delivery Company to bolster the Euston Housing Delivery Group which was

established by the Ministry of Housing, Communities and Local Government (MHCLG) to work in partnership with the London Borough of Camden and advise ministers and local leaders on “an ambitious housing and regeneration initiative for Euston” which looks at realistic options to deliver more homes in the wider Euston area and deliver ‘exemplary placemaking’. The area is therefore a focal point for government activity to both deliver HS2/ station infrastructure and deliver commercial, life sciences and affordable homes which sets the context for the review of the Plan.

*Content of the Proposed Submission EAP Update – proposed updates*

- 2.5. A chapter by chapter summary of the proposed submission EAP update is provided at Appendix F. Overall, the proposed submission draft of the EAP identifies capacity in the region of:

- 2,000 new homes (2023 Draft: 1,500 to 2,800; 2015 EAP: 2,800 – 3,800)
- 10,000 to 17,500 new jobs (2023 draft: 8,000 – 17,500 new jobs EAP: 7,700 – 14,100); and includes
- 20,000sqm of retail – quantum remains the same as 2015 EAP

It seeks to accommodate most of the growth above the station and tracks and takes into account the potential areas over the station and tracks where funded development is possible, reflecting building constraints and cost savings.

- 2.6. The EAP notes that should new areas for development be identified through design refinement of the stations and/ or the work to meet Central Government's ambition to deliver new homes in the wider Euston area, it may be possible to deliver in excess of the development identified in the EAP. Further detailed design work and engagement with local communities will be required.
- 2.7. 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).
- 2.8. The Delivery, planning benefits and monitoring section of the EAP notes that the challenges with viability, especially as there are currently no confirmed design or costs for the National Rail, HS2 or London Underground stations, 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. Discussions are ongoing with landowners to refine this and 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.
- 2.9. In recognising the extraordinary costs associated with enabling development over the station the EAP notes that if additional development or taller buildings

are necessary to facilitate the significant levels of infrastructure, some flexibility towards other requirements in this plan may be considered (this wording is retained from the adopted EAP).

- 2.10. An 'insert' of the EAP area is to be shown on the Local Plan Policies Map, adding the spatial extent where policies in the EAP update apply. The Euston insert is set out in Appendix D.

### **3. OPTIONS APPRAISAL**

- 3.1. The options available to the Cabinet are as follows:
- approve the updated draft of the EAP update for publication and submission for public examination;
  - Stop work on the Update to the EAP and continue to operate with the 2015 EAP
- 3.2 The HS2 Act grants an outline (known as "deemed") planning permission for the construction of the railway (which includes the HS2 station and associated buildings such as vent shafts) but some of the detailed design and construction are subject to further approvals by Camden as the local planning authority under Schedule 17 of the HS2 Act.
- 3.3 Lendlease's future application for development over and around Euston Station (often referred to as Over Station Development – OSD) will be considered by the Local Planning Authority under the usual planning regime 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.
- 3.4 Planning law requires that decisions on planning applications be taken in accordance with the 'development plan' unless material considerations indicate otherwise (see section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004). All applications for development at Euston will need to be assessed against the relevant policies in the EAP, alongside the Camden Local Plan, the London Plan and National planning policies.
- 3.5 An updated EAP, reflecting the latest information and an updated evidence base where necessary, should provide a robust, up to date set of policies by which to assess any future applications for the area. This is therefore the recommended option. The proposed consultation is a legislative necessity to progress with the update to the EAP and a Cabinet decision to do this is required.
- 3.6 If an update to the EAP is not progressed, it would likely be concluded that the EAP is out of date and legislation states that (among other reasons), in the absence of relevant up to date development plan policies, the balance is tilted in favour of sustainable development. This means that planning permission should be granted except where the benefits of doing so are outweighed by any adverse impacts when assessed against the policies in the NPPF taken as a whole. This could significantly limit the Council's decision-making powers. Therefore the "take no action" option is not recommended.



#### **4. WHAT ARE THE KEY IMPACTS / RISKS? HOW WILL THEY BE ADDRESSED?**

- 4.1. The EAP is a formal 'development plan' document that needs to be prepared in accordance with a statutory process and would be at risk of legal challenge if procedures are not followed. The update of the EAP is being project managed to ensure that it fully takes into account the relevant regulations, guidance in the NPPF and Camden's Statement of Community Involvement (SCI), which sets out how the Council will involve the community in making planning decisions and policy.
- 4.2. The update to the EAP will be examined by an independent examiner to assess whether it has been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are: (a) Positively prepared; (b) Justified; (c) Effective and (d) Consistent with national policy. Whilst every effort has been made to ensure that the Plan meets all requirements and is capable of being found sound, there is still a risk that the Planning Inspector examining the plan could identify soundness issues. This could require further work to resolve the issues, which would lead to a delay in the adoption of the Plan.
- 4.3. The proposed approach in the draft EAP update has been discussed with the Planning Inspectorate and Planning Advisory Service, and legal advice sought, to ensure the Council can demonstrate a robust process has been followed in the preparation of the Plan.
- 4.4. London boroughs' local plans must be in general conformity with the London Plan. Officers have proactively engaged with the Greater London Authority (GLA) as part of the preparation of the updates to the EAP to minimise the likelihood of an objection from the GLA on conformity grounds.
- 4.5. The Council has also been actively engaging with neighbouring local authorities and other bodies on an ongoing basis to ensure that the "duty to co-operate" introduced by the Localism Act 2011 is met.
- 4.6. There is a risk that proposals and projected costs could change, changing the evidence base. If new figures emerge, they may need to be considered in future assessments. Given the long term and complex nature of the project this is expected. Updating the EAP now, as Lendlease develop their plans for Euston, is important so that there is a robust, up to date set of policies by which to assess their application. Designs and constraints may change over time, but it will be important for development to meet the policy objectives of the updated EAP policies.
- 4.7. To avoid confusion for stakeholders, it's important that the purpose and process of the EAP review are clearly explained during consultation and engagement by the Council and delivery partners. Two main areas of work identified include:
  - Public engagement by the delivery organisations at Euston

- As part of the work of the Housing Delivery Group there are plans to develop a framework setting out priorities for new housing delivery with local residents to help shape future housing in the Euston area.

#### 4.8. *Sustainability Appraisal*

A sustainability appraisal (including a strategic environmental assessment) of the proposed updates to the EAP has been carried out to meet the legal requirement in section 19 of the Planning and Compulsory Purchase Act 2004. This is attached at Appendix E.

- 4.9. The appraisal indicates that overall, the proposed updates to the EAP will promote sustainable development. The sustainability appraisal will be made available for comment during consultation on the EAP update Proposed Submission. It found that the proposed amendments to the EAP will help to address identified economic inequalities, with positive effects through a strong focus on inclusive growth. The appraisal identified the potential for some negative environmental and social impacts of major development which should be mitigated in accordance with adopted EAP policies. Overall, the policies and updates provide a strong positive framework to guide future sustainable development.

### 5. **CONSULTATION/ENGAGEMENT**

#### 5.1. *Consultation and engagement to date*

- 5.2. Engagement for the update to the EAP built on the engagement and consultation that had happened to date, spanning many years and building on what we have heard previously. This is summarised in the report of Cabinet Member for New Homes, Jobs and Community Investment, to Cabinet on the [Euston Area Plan \(EAP\) Update \(SC/2022/21\)](#), December 2022. In addition to ongoing conversations with members and officers across various Council departments, Camden has run several engagement events. These have taken place among ongoing communication with local stakeholder groups and participation at community meetings.

- 5.3. The Council has a legal duty to cooperate on strategic cross-boundary planning matters. The EAP update, developed in collaboration with the GLA, TfL, and other stakeholders, demonstrates compliance with this duty. The Council continues to monitor this through ongoing engagement, including meetings with neighbouring boroughs and statutory bodies.

#### 5.4. *Consultation on draft update to the EAP*

Following Cabinet approval in December 2022, the proposed update to the EAP was published for consultation and engagement for 6 weeks in January 2023, to enable residents, businesses, community groups, landowners and other key stakeholders to share their views on the Plan's policies and approach. The Plan was available online and hard copies of the draft plan were also made available. The engagement was widely advertised through emails, newspaper advertisements, the Council's website, social media, posters and articles in newsletters. A number of drop-in sessions were held

(online and in person) and information was made available at existing community sessions.

- 5.5. A Summary of responses is provided at Appendix C. Most responses requested that amendments be made to the wording of the EAP Update but did not generally raise fundamental issues about the Plan's approach or its ability to be found sound at public examination. Where more fundamental issues were raised, such as by the landowners, we have sought to address these through reference to Central Government Guidance and meetings to understand specific concerns.
- 5.6. *Additional Consultation*  
An additional consultation was held in Summer 2024. It aimed to provide a 'direction of travel' update in response to the changes and uncertainty following the Government's announcements regarding HS2 and Euston. A summary of responses is provided in Appendix C. All comments received were considered alongside the 2023 consultation responses to inform the proposed submission draft of the EAP.
- 5.7. Subject to Council approval, the EAP update Proposed Submission Draft will be published for representations. The purpose of this is to seek representations on the 'soundness' of the plan (see paragraph 4.2) so these can be considered by the Inspector during the public examination. Supporting materials (such as the sustainability appraisal, a statement on the representations received during 'publication', and the Policies Map) are submitted alongside the Plan.
- Equalities Impact Assessment*
- 5.8. An Equality Impact Assessment (EqIA) of the EAP Update Proposed Submission draft has been carried out, and is attached as Appendix B. The assessment updated the draft assessment that was carried out on the proposed updates to the EAP which was published for consultation in January 2023. It considers the impact of the draft update to the EAP on groups that are protected in terms of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. It also considered the impact on the following: foster carers, looked after children / care leavers, low income households, refugees and asylum seekers, parents (of any gender, with children aged under 18), people who are homeless, private rental tenants in deprived areas, single parent households, and social housing tenants.
- 5.9. In assessing the proposed updates to the EAP, the EqIA concludes that as with the original EAP, there are no predicted negative impacts on protected groups envisaged as a result of the policy updates proposed and that on balance the proposed policies in the EAP Proposed Submission Draft would have a largely positive impact on the above groups. Proposed updates include the expectation that in the delivery of the overall strategy, it will be important to ensure that investment delivers benefits where they are most needed, maximising social value at the planning, construction and end user phases, ensuring that all aspects of development promote health and wellbeing and address concerns around safety and security.

## 6. LEGAL IMPLICATIONS

### *Primary planning legislation*

- 6.1. Under the Planning and Compulsory Purchase Act 2004 (as amended), the Euston Area Plan (as a Development Plan Document within the Council's Local Plan) must:

- be in general conformity with the London Plan;
- have been submitted to the Secretary of State for independent examination;
- have been considered "sound"; and
- have complied with the "duty to co-operate".

### *Secondary planning legislation*

- 6.2. As a Development Plan Document, the Euston Area Plan must have satisfied the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 during its preparation in respect of, for example

- notification of relevant bodies and persons;
- taking into account representations made;
- publication of the plan; and
- publication of the appointed inspector's recommendations and reasons.

### *National planning policy*

- 6.3. During its preparation the Euston Area Plan must take into account the National Planning Policy Framework

### *Reviewing a Local Plan*

- 6.4. The Council must review a local development document within five years of the date of the adoption of the local plan in accordance with the Planning and Compulsory Purchase Act 2004.

### *Council approval and adoption*

- 6.5. The decision to approve a Development Plan Document for submission to the Secretary of State for examination and its adoption must be made by full Council under the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 (as made under the Local Government Act 2000 (as amended)).

- 6.6. The Public Sector Equality Duty is a legal obligation placed on public bodies under the Equality Act 2010. In summary, these legal obligations require the Council, when exercising its functions, to have 'due regard' to the need to:-

- Eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act;
- to advance equality of opportunity between people who share a relevant protected characteristic and those who do not;
- Foster good relations between people who share a relevant protected characteristic and those who do not (which involves tackling prejudice and promoting understanding).

- 6.7. In considering the recommendations the Cabinet and Council must have due regard to the impact those decisions will have upon the Council's statutory duty with regard to equalities as set out in Section 149 of the Equalities Act

2010. The Equality Impact Assessment of the Local Plan Proposed Submission Draft is appended as Appendix B to this report.

- 6.8. As explained in paragraph 5.7 above, the EAP Proposed Submission Draft will be made available for public inspection and comment, together with all the supporting material, in accordance with Regulation 19. Representations are made under Regulation 20, and, these should predominantly be about the 'soundness' (as explained in paragraph 5.6 above) of the revisions as defined in paragraph 36 of the NPPF.
- 6.9. The legislative requirements associated with preparing the EAP Update Proposed Submission draft have been complied with by, the council including the statutory duty to co-operate pursuant to section 110 of the Localism Act 2011 (as explained in paragraph 4.4 above) considerations to equalities (as explained in paragraph 5.8 above), and its other statutory requirements under the various Acts, Policies and Regulations that govern the process. It has been concluded that should a decision be made to proceed with the publication and submission to the government for examination all relevant legislative requirements will have been met.

## **7. RESOURCE IMPLICATIONS**

- 7.1. The Council is an important landowner in the area covered by the EAP and will have a key role to play in delivering the housing opportunities set out in the plan either alone or in partnership. However, any housing development schemes will need to be both viable and affordable for the Council and will be subject to separate decisions.
- 7.2. This report seeks approval of the Euston Area Plan (EAP) Review Proposed Submission Draft. The new EAP will be a key delivery mechanism for the Council's future planning and development decisions. The EAP will ensure that Camden continues to have effective, up-to-date planning policies that will allow the Council to make planning decisions that contribute towards addressing the borough's need for new homes, jobs and infrastructure. As a result, this should have a positive impact on business rates and council tax.
- 7.3. There is a risk that if the new EAP is not approved the Council will not have up-to-date detailed planning policies that are based on a locally based approach, and this would limit the Council's ability to ensure developments contribute to achieving its priorities.
- 7.4. As set out in section 3.2, without an updated EAP the Council could increasingly face difficulties in defending its decisions at planning appeals, which could result in an increase in permissions granted by a Planning Inspector contrary to the Council's own decisions and have financial implications for the Council.

## **8. ENVIRONMENTAL IMPLICATIONS**

- 8.1. In response to the Council's Climate and Ecological Emergency declaration, the EAP highlights that development at Euston should be delivered in line with the Draft Local Plan's requirement for development to meet the highest

feasible environmental standards during construction and occupation, and should respond to the suite of policies in the Local Plan which seek to ensure that new development is designed to mitigate and adapt to climate change to respond to the climate emergency, focusing on maximising resource and energy efficiency and delivering net zero carbon development which, in operation, is ultra low energy, fossil fuel free and uses low carbon heat.

- 8.2. The Proposed submission draft of the EAP Update Euston Area Plan outlines various strategies and policies which are cross cutting and will help to achieve the ambition that "Camden should be a green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency." In addition to the specific approach outlined above, these include:

- Enhancing Green Infrastructure and Green and Open Spaces:
- Promoting Active Travel
- Community-led initiatives to empower
- High-Quality, Inclusive Design

## **9. TIMETABLE FOR IMPLEMENTATION**

- 9.1. As a development plan document, the review of the EAP has to follow statutory procedures. Subject to Council approval of the submission draft EAP Update, it will be published for comment. Representations received and supporting documents will be submitted with the Plan to the government in Spring 2026. The Plan will then be examined by a Planning Inspector. The examination will include public hearing sessions involving objectors and other participants invited by the Inspector. These are expected to take place later in 2026.
- 9.2 Following receipt of the Inspector's report (and consideration of any recommended amendments) the EAP update will be reported to Cabinet and Full Council for adoption as part of Camden's 'development plan', that is, the statutory starting point for decisions on planning applications.
- 9.3 An emerging plan is a relevant matter ('material consideration') in planning decisions with the weight given to it depending on the stage of preparation on the draft plan (with weight increasing as the updated EAP progresses) and the extent particular elements have attracted objections. At this early stage in the preparation process the draft update to the EAP will have limited weight in planning decisions but as a statement of the Council's emerging thinking it will begin to influence planning proposals.

## **10. APPENDICES**

**Appendix A:** EAP Updates Proposed Submission Draft

**Appendix B:** Equality Impact Assessment of the EAP Proposed Submission Draft

**Appendix C:** Summary of responses to engagement on the proposed updates to the EAP (Regulation 18 stage)

**Appendix D:** EAP Policies Map

**Appendix E:** Sustainability Appraisal of the EAP Proposed Submission

Draft

**Appendix F:** A chapter-by-chapter summary of the proposed submission EAP