

London Borough of Camden

Euston Area Plan Update

Regulation 18 Consultation Statement

This Consultation summary includes the following sections:

- Introduction
- Statement of Community Involvement
- Regulations
- Stage 1 (Regulation 18)
- Consultation activities
- Consultation responses & Council response
- Supplementary Consultation

Introduction

- 1.1 The Euston Area Plan (EAP) was adopted in 2015. It is a long-term planning framework to guide transformational change in the area, focused on the redevelopment of Euston station. 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.
- 1.2 The policies in the EAP were reviewed in 2020 and a decision was taken to partially update the EAP to take account of changing circumstances affecting the area.
- 1.3 The proposed updates to the EAP were prepared alongside work by HS2 Ltd to progress their station design, work by Network Rail to consider the redevelopment of the existing Euston station and work by Lendlease to develop a masterplan for the area over the station and tracks and in the cuttings.
- 1.4 The EAP Update covers:
1. Jobs and homes capacity review taking account of changes to areas enabled for development
 2. How to ensure good growth with additional focus on health and wellbeing, safety and security and social value
 3. Definition of tall buildings
 4. Additional focus on pedestrian and cyclist experience and safety
 5. Increased focus on low-carbon development, zero emission heating, resource efficiency and circular economy
 6. Principles for public open space
 7. Viability and constraints
- 1.5 There was a public consultation on the EAP Update running from 4th January 2023 for 6 weeks. This report summarises the consultation process, the responses received and the Council's proposed response to them.
- 1.6 Soon after this 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, and we have now restarted work on the Plan.
- 1.7 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). The consultation ran from 8th July to 8th September 2024. In reviewing the limited information that was available to us we considered that many of the issues remained broadly the same, as do our aspirations for the Euston area, however there are some elements that we understand will change and we have tried to highlight 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.

2.0 Statement of Community Involvement

2.1 Camden's Statement of Community Involvement (SCI) sets out how the Council will involve local people when preparing planning policies. In undertaking the consultation on the EAP Update the Council has followed the principles of the SCI. Key principles from the SCI which have been followed in this consultation include:

- Being clear about the aims and scope of the consultation,
- Helping people to be involved by consulting them in a variety of ways,
- Being inclusive so that a good range of views are obtained, and
- Seeking views at the earliest possible stage and throughout the process.

3.0 Regulations

3.1 The EAP Update will be subject to two stages of consultation. The stages are listed below. The regulations referred to below are from the Town and Country Planning (Local Planning) (England) Regulations 2012.

Stage 1: (Regulation 18) Draft EAP Update

Stage 2: (Regulation 19) Proposed Submission Draft EAP Update and responses pursuant to regulation 20 (undertaken in the lead up to the Examination)

4.0 Stage 1 (Regulation 18)

4.1 When preparing a Local Plan local planning authorities must undertake initial consultation in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The regulations state that the local planning authority must notify interested parties and individuals, including the prescribed bodies defined in the Regulations, invite comment, and must take into consideration the representations made in response.

4.2 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 have informed the EAP Update. The EAP Update also took account of ongoing consultation with the Residents Advisory Group and business and community groups.

4.3 In early 2020 Camden consulted on a Draft Euston Planning Brief which included guidance for development above Euston station as well as the other sub-areas identified in the EAP. Elements of the planning brief have been incorporated into the EAP Update.

4.4 In December 2020 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).

Consultation activities

4.5 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
- Site notices throughout the Euston Area
- Public drop-in sessions
- Leaflet handout at Euston Station

Email Responses

4.6 We contacted a wide range of interested parties and individuals, comprising:

- contacts on the Council's planning policy database, which is comprised of individuals and organisations who have asked to be contacted about planning policy matters, including those who have previously responded to planning consultations, and consultation bodies in accordance with regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012,
- Camden Councillors,
- neighbouring planning authorities (Barnet, Brent, City of London, Haringey, Islington and Westminster),
- prescribed bodies, in accordance with the 'duty to cooperate' (as set out below),
- neighbourhood planning forums and proposed neighbourhood planning forums and their members,
- landowners in the Euston area.

Commonplace Responses

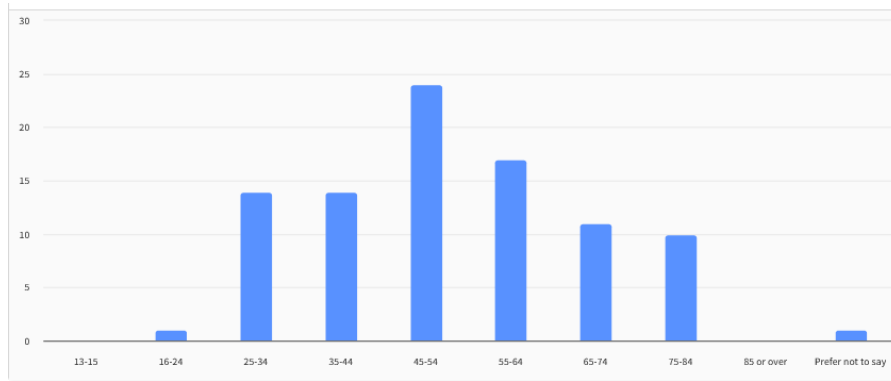
4.7 Commonplace is a comprehensive online consultation platform that was utilised during this round of public consultation. The Commonplace website included an umbrella page with an overall map of all sub-areas within the EAP plotted out and tiles linking to each strategy.

4.8 Link: <https://eustonareaplanreview.commonplace.is/> Commonplace was live from 6 January to the 19 February 2023. During this period there were 3,784 visitors to the Commonplace website and a total of 147 respondents who made 400 contributions.

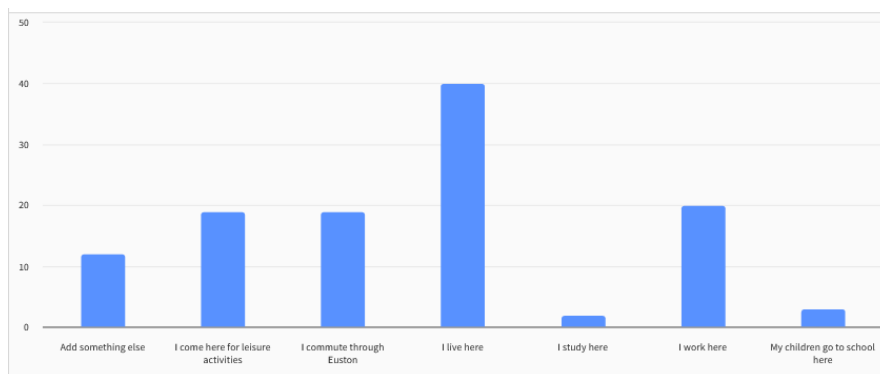
Most respondents were aged over 45 and lived or worked in the Euston area. In terms of ethnicity, of the 48 people who responded to this question 72% were white (35) with 12.5% 'other white' (6) and 8% 'mixed / multiple' (4).

Age group of respondents

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Connection to Euston area



Euston Area Plan website

- 4.9 The consultation was publicised on the dedicated Euston Area Plan website. Link: <https://www.eustonareaplan.info/>

Social Media

- 4.10 We delivered 3 weeks of geotargeted Facebook Adverts to the Regent's Park Estate area, and additional organic Twitter and Nextdoor posts, encouraging engagement and signposting to the EAP microsite as well as publicising the drop-in sessions. The public consultation was publicised within the Nextdoor app, which is a private social network for your neighbourhood.

Twitter

- 4.11 Over the course of the consultation period, we sent two tweets per week promoting the consultation. We used the LB Camden official twitter account @camdentalking which has 14,333 followers.

Facebook

4.12 Two methods of communication:

Method 1, geo-targeted notifications to 1km radius of Euston Station. Reaching 12,500 Facebook users with a 7.3% engagement rate click through to microsite.

Method 2, geo-targeted spend to 1km radius of Euston Station in translated (Bengali, Spanish and Somali) adverts. Reaching 12,000 Facebook users with a 3.8% engagement rate click through to microsite.

4.13 There were 1360 total clicks through to the microsite from the Facebook adverts. EAP posts massively outperformed average Facebook advert engagement rates of 0.9% and had the second highest engagement rate of any Camden paid advert in December and January (second only to Cost of Living content).

4.14 Translated posts also out-performed average Facebook engagement rates, though performed worse than initial method 1 adverts in English. As these were targeted at under-represented groups in the area, this should still be considered a success.

Libraries

4.15 Consultation boards highlighting key aspects of the consultation were placed in the Pancras Library at 5 Pancras Square and the library at the Crowndale Centre. Hard copies of the draft plan were also made available.

4.16 Posters advertising the consultation drop-in sessions were also displayed within all public libraries.

Newspapers

4.17 An advert was published in the Camden New Journal on Thursday 5 January 2023.

Site Notices

4.18 A coloured A5 site notice was posted throughout the Euston Area for the duration of the consultation period with information about the consultation and public drop-in events.

Public drop-in events

4.19 A number of drop-in events were held where interested stakeholders could attend to view the consultation materials and discuss proposals directly with Council officers. The events were held on the following dates and locations:

- Tuesday 17th January, 8.30am to 11.30am, Surma Community Centre, 1 Robert Street, NW1 3JU
- Thursday 19th January, 1pm to 4pm, The St Pancras and Somers Town Living Centre, 2 Ossulston Street, NW1 1DF
- Tuesday 24th January, 10am to 1pm, Dick Collins Hall, Robert Street, NW1 3FB
- Thursday 26th January, 4pm to 7pm, Amptill Tenants' Hall, Opposite Stockbeck in Barnby Street, NW1 2RS

Duty to cooperate

4.20 To comply with the Localism Act and the NPPF, the Euston Area Plan is being prepared in accordance with the Duty to Co-operate. This means involving specific consultees in

preparing the document including neighbouring and nearby local authorities, statutory consultees and infrastructure providers. The full list of Duty to Co-operate bodies included is specified in the Town and Country Planning (Local Planning) (England) Regulations 2012.

- 4.21 The duty to cooperate was introduced in the Localism Act 2011. It places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
- 4.22 The Council held a series of meetings with planning officers from neighbouring planning authorities (Brent, City of London, Haringey, 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.

Summary of responses

Our Strategy for development at Euston

- 4.23 The Commonplace website asked for views on the proposed updates to the overall strategy. There were 44 Commonplace responses to this question, of which 11 responses fully agreed or mostly agreed, 15 responses neither agreed or disagreed and 18 responses either mostly disagreed or did not agree at all. Below is a summary of the responses:
- Objections to decrease in new homes and increase in new jobs.
 - Concerns over overdevelopment and height of new development.
 - Request for a limit on new retail space.
 - Protect Euston Square Gardens, including the mature trees.
 - Support for pedestrianisation of Phoenix Road.
 - Greater focus on sport and leisure facilities needed.
 - Many of the issues raised by the consultation responses to the 'overall strategy' were also raised in response to other chapters. The concerns raised alongside the relevant chapter (shown in brackets) are as follows: Greater focus on heritage assets needed in Somers Town (West Somers Town); more affordable housing for local residents and limit student housing (Land Use Strategy); more open and green spaces that are truly green (Open Space Strategy); more and safer crossings over Euston Road needed (Transport Strategy); and support for east-west routes across stations (Design Strategy). The Council's responses to these comments are provided in the identified chapter.

Council response

- The land use figures used in the Commonplace summary were incorrect. The range for homes included in the draft EAP update was for between 1,500 and approximately 2,500 additional homes, while in the Commonplace summary the upper end of the range was shown as 2,800 new homes. For jobs, the range included in the draft EAP Update was for between 8,000 and 17,500 additional jobs, whereas the Commonplace summary set out between 8,500 and 14,700 jobs. We have noted the comments received in relation to the decrease in homes and increase in jobs as part

of the proposed updates to the EAP and have responded to these points below.

- A number of factors impact the proposed land use mix in the Euston Area and the changes in the number of homes and jobs since the adoption of the current EAP. The increase in job numbers is largely 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.
 - In developing further options for the station in response to the Government's Network North announcement, we will seek to optimise opportunities for residential development in the context of the constraints, and the viability of development.
 - 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 through modelling, taking account of the London View Management Framework, impact on local views and townscape.
 - The Council's Public Open Space guidance 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.
 - The Euston Road chapter of the EAP Update includes specific guidance on Euston Square Gardens and states 'the 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.'
 - 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.
- In relation to the concern that leisure and sport need greater focus, the Land Use Strategy seeks the provision of 20,000sqm of retail and leisure floorspace and seeks the joint preparation of a Retail and Leisure Strategy by Project Partners to consider retail and leisure provision across the whole site and throughout all the development stages. Leisure facilities include the provision for sports and exercise.

Land Use Strategy

- 4.24 There were 21 Commonplace responses related to the proposed updates to the Land Use Strategy: 5 responses either fully agreed or mostly agreed, 4 responses were neutral (neither agreed nor disagreed) and 10 responses either mostly disagreed or did not agree at all.
- 4.25 In relation to the 'additional focus on health and wellbeing, safety and security and inclusive growth and social value' in the Land Use Strategy, 11 responses either fully agreed or mostly agreed, 3 responses were neutral and the remaining 5 responses either mostly disagreed or did not agree at all.
- 4.26 There were also 14 email responses with comments on the Land Use Strategy. The email and Commonplace responses are summarised below.
- Object to decrease in homes and increase in new jobs¹.

¹ * These comments were also made in response to the preceding section 'Our Strategy for Development at Euston', and the Council's response is provided in that section.

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- Affordable housing should be defined with emphasis on social rent. Prioritise affordable homes for local people and key workers. Calls for local lettings policy.
- Workspace should emphasise affordable workspace and its integration with residential areas. Calls for flexible approach to affordable workspace which considers development viability.
- New retail space is excessive^{*}. Retail floorspace provision should not be at expense of operational transport requirements, for example the provision of a suitably sized bus station.
- Support activation of station edge on western side of Eversholt Street but would like affordable units for community.
- Objection to lack of replacement of St James Gardens.
- Support Knowledge Quarter policy and a mix of education, research, student housing, and appropriate evening activities. Suggests broader definition of Knowledge Quarter uses as future growth areas are uncertain and may have not yet emerged. Request large office floorplate is added to list of types of floorspace to support Knowledge Quarter uses.
- There should be a limit on student housing. Objects to prioritisation of conventional housing over student housing. Evidence required for 75% permanent, self-contained homes target and greater clarity as to what this means.
- Calls for flexible approach on housing product. Request evidence base for commercial space calculations.
- Land use designation of zones over Network Rail trainshed unduly prescriptive and calls for greater flexibility.
- Development above the HS2 tracks adjacent to the north of Hampstead Road bridge is not feasible from a technical perspective. Active frontages indicated on the plan are not all feasible in connection with the HS2 scheme given station requirements and 'back of house' functions. Retail Impact Assessment and Cultural Strategy are not required for HS2 Schedule 17 applications.
- The EAP should set indicative capacities, not targets.

Council Response

- Camden will require developers to deliver affordable housing in line with policy in the Camden Local Plan and the London Plan and to provide the maximum reasonable level of affordable housing on individual sites. Camden Council's preferred tenures are social- affordable rented housing and intermediate rented housing (the guideline mix is 60% social-affordable rented housing and 40% intermediate housing).
- Local Lettings Policy falls outside of the remit of the EAP and would need to be adopted separately. This proposal will be put forward to the relevant team for consideration.
- The EAP set 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. 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. It is noted that the Draft New Local Plan 2024 states that the Council will seek 20% of the gross floorspace to be provided at 50% of the market rent for a minimum period of 15 years.
- The EAP 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.
- While not subject to planning permission, retail within the HS2 station would count towards the total retail floorspace and would impact on the amount of retail that could be provided elsewhere in the Euston area. Retail outside of the HS2 station that

- exceed this amount would be subject to a Retail Impact Assessment.
- New open space will be provided as part of HS2's mitigation for the loss of open space, including St James' Gardens, this is set out in HS2's Environmental Statement.
 - The definition of Knowledge Quarter uses is deemed to be appropriate and justified. It allows for 'other employment uses' where it is shown that these reflect current and emerging needs of the knowledge economy. The area surrounding King's Cross, including Euston, is unique in terms of its concentration of knowledge economy organisations. Therefore, to continue to support the Knowledge Quarter, the Council will prioritise knowledge economy floorspace over large-scale office developments.
 - In relation to calls for a flexible approach to housing products, housing should be delivered in accordance with Camden Council's housing priorities. Camden Council's overall priority is to maximise the provision of housing units as permanent homes to meet local housing needs. The evidence of housing need is set out in the Strategic Housing Market Assessment. Therefore at least 75% of new housing should be provided as permanent self-contained homes. The EAP calls for the majority of housing to be delivered as permanent self-contained homes. Permanent self-contained homes include build to rent housing. The Plan allows for a proportion of student housing to be delivered as part of the overall housing mix. The housing strategy acknowledges that student housing and build to rent units may be appropriate in specific contexts above the station, but the strategy does not preclude the provision of student housing and build to rent in other locations.
 - The capacity for commercial space has been calculated to optimise the amount of floorspace that can be delivered within the constraints of the site and in accord with the Council's policy priorities, notably the prioritisation of self-contained housing and also consideration of where it might be possible to deliver self-contained housing. It will be necessary to consider viability outputs as further options are worked up. Details of the capacity work will be published in due course.
 - The designation of sites above the network rail trainshed roof, including the Royal Mail site, as 'Mixed-use with housing as priority' reflects the Council's overall land use priority, which is to maximise the provision of housing units as permanent homes to meet local housing needs. The overall approach above and around the train station may be reviewed when more is known about the future design and viability of the station(s) and what land is possible to enable for development.
 - It is acknowledged that development above the HS2 tracks immediately to the north of Hampstead Road bridge is not currently technically feasible and Figure 3.2 will be updated.
 - As part of any application HS2 Ltd should provide evidence why active frontage cannot be provided in places indicated on the plans in the EAP.
 - Concern has been raised about the use of the phrase 'exceed the targets'. The Council will review the text in 'Land Use Strategic Principle EAP 1 A' to confirm alignment with the London Plan and the draft new Local Plan 2024.

Design Strategy

There were 28 Commonplace responses. In relation to the proposed updates to the Design Strategy, 6 responses either fully agreed or mostly agreed, 7 responses were neutral (neither agreed nor disagreed) and 13 responses either mostly disagreed or did not agree at all.

In relation to the proposed approach to tall buildings in the Design Strategy, 2 responses either fully agreed or mostly agreed, 7 responses were neutral and 15 responses either mostly disagreed or did not agree at all.

There were also 14 email responses with comments on the Design Strategy. The email and Commonplace responses are summarised below.

Summary of responses

Heritage:

- Request to include Community-led heritage assessment to show the local communities' commitment to heritage conservation and enhancement.
- Support protection of heritage assets and designated viewing corridors.

Building heights:

- Concern regarding height of proposed buildings and general impact of tall buildings. Specific concerns raised about the impact of tall buildings along Eversholt Street and the proposed 4-7 storey buildings behind Mornington Crescent.
- Suggestion that new development heights should match existing building heights.
- Concern regarding impact of proposed massing and heights on views and heritage sites.
- Concerns over viability of scheme with proposed quantum in EAP update.

LVMF:

- St Paul's Cathedral welcomes references in EAP to compliance with London View Management Framework (LVMF) and preserving significance of built heritage assets. Expressed concerns regarding outlined development heights and potential areas for tall buildings and impact on views and heritage significance. Particular concern with tall buildings in the wider setting consultation area of view 6A.1 and 5A.2 and at the edge of the wider setting consultation area for the view 4A.1. Additional assessment is required and there should be engagement with the Cathedral for the next stages of the plan review.
- Request for clarification that development intruding into Landmark Viewing Corridors and Wider Setting Consultation Areas are not treated the same in LVMF policy and the EAP wording around heights should align with LVMF policy.
- Potential impact on Viewing Corridor 4A.1 from development across EAP area should be discussed and included in EAP.

Routes and permeability

- Concern proposed walkway/ bridge to access Clarkson Row from Cutting could become area for antisocial behaviour.
- Support for improving connectivity objective. Noting that current HS2 station design disrupts east-west links. Request stronger commitment to local community engagement in relation to preparation of Design Codes.
- EAP should reflect emerging HS2 station design in relation to east- west routes open 24-hours a day and greening of all routes.

Open space

- Not enough green space created in Camden Cutting area.
- Spaces around Euston Opportunity Area should be welcoming and inclusive regardless of ownership and new public spaces should accord with Mayor's Public London Charter.
- concerned that replacement green space will be landscaped and not for activities.

Design guidance

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- More detail about building architecture and design codes needed.
- Strategy should refer to building-integrated biodiversity measures.
- Too little attention is paid to sustainable building practices. The EAP should explain site complexities and importance of establishing common vision and agreed standards to bring together the various development projects.

Council Response

Heritage:

- The Community-led heritage assessment will be included in the list of evidence base documents.

Building heights:

- The EAP Update acknowledges the importance of the Euston location. Euston's potential role as a major economic driver within the Central Activities Zone (CAZ) and its function as a major transport hub make it a suitable location for optimising development opportunities and increasing density, including well-designed taller buildings in specific locations.
- Heights have been tested through a design-led approach and 3d modelling, taking into account the London View Management Framework (LVMF) context and impacts on local views, heritage and townscape. Heights caps are mentioned where these have been refined thoroughly with stakeholders including the GLA.
- The EAP potential heights map is illustrative and development proposals would be further tested in relation to Development Plan policies (including impact on heritage and neighbouring amenities) at pre-application / application stage including a requirement for a detailed view assessment using Accurate Visual Representation to assess the impacts. The cumulative impacts of tall buildings would be assessed through this process. The impact of tall buildings on air quality would also be assessed. Air movement affected by tall buildings should support the effective dispersion of pollutants. Tall Building proposals would also need to address the following issues: fire safety; microclimate; overlooking; architecture; biodiversity and sustainability.
- The impact of massing on the local street network is considered and the EAP Update states that the base of a tall building *"should have a direct relationship with the street. The scale and detail should be of a finer grain responding to context and considering how people will interact with it. The design of tall buildings should take particular consideration of the relationship with its lower neighbouring context"*.
- Concerns around potential general building heights are noted and the illustrative masterplan showing potential general building heights will be reviewed.
- The range of employment floorspace is considered to be appropriate representing the capacity capable of being supported in the Euston area – able to meet both wider planning requirements and the Plan policies and objectives (including London Plan policies). It is recognised that with the unusual costs involved in redeveloping the station and above tracks, development viability will be a considerable challenge. In considering proposals, it is recognised that subject to assessment of viability, there may need to be some flexibility in the way that the policies in the Plan are applied.

LVMF

- EAP heights and massing have been tested through 3D modelling and we have engaged with the GLA and discussed compliance with the LVMF. It should be noted that the height map is illustrative and any building which encroaches on the LVMF will be subject to consultation with the GLA.

- The impact on view 4A.1 Primrose Hill is referenced in the Cuttings chapter.
- The Council will review the EAP text which relates to heights and the LVMF to confirm alignment with the London Plan.
- It is acknowledged there will be an impact on some views from Regents Park. It is anticipated that most of the impact is mitigated by the existing tree canopies. The additional views (New View 1 and 2) show that the proposed buildings would not be visible from the lawn. The EAP Update acknowledges that 'there may be impacts on local heritage assets, local views and context which would need to be addressed'.
- The impact from further away in Regent's Park (i.e., sports pitches) is deemed acceptable within the Central London context and the existing impact of other buildings visible from these locations.

Routes and permeability

- In relation to the concern with anti-social behaviour (ASB) resulting from the proposed walkway linking to Clarkson Row, it is noted that connections are usually deemed to improve ASB due to the increased passive surveillance from footfall. Major applications are expected to be accompanied by Crime Impact Assessments to demonstrate that development considers crime and anti-social behaviour.
- Improving connectivity remains a key objective of the EAP Update. The redesign of the HS2 station to deliver an affordable scheme could result in the rationalisation of routes. While the Council's aspiration for enhanced east west and north south routes remains, it may not be possible to deliver these straight away. Where this is the case, the Council will aim to safeguard options to allow for future enhancements.
- The EAP has been prepared with supporting technical information from HS2 on the emerging HS2 station design including the extent of enabled development above the HS2 infrastructure. While taking account of emerging station design, the EAP Update looks at how to make the most of the HS2 and Network Rail station designs, to try to ensure that the station designs, and associated development responds to the EAP and community objectives as much as possible. The EAP Update does not refer in detail to specific design elements of the HS2 station and this approach future-proofs the document allowing for future changes to HS2 design to better meet the Council's aspirations for routes to "maintain a 'street like feel': open to the sky, permeable, inviting, legible and publicly accessible at all times".

Open space

- Strategic Principle EAP5 addresses the issue of public open space provision meeting a variety of needs. It states: "A range of new open spaces will be sought appropriate to the needs of potential users, location and local character, and will include larger public open spaces, civic spaces and public realm, play space and local green spaces."
- The EAP Update addresses the Mayor's Public London Charter. Development proposals would need to address measures to ensure that spaces feel and function as public open space irrespective of their ownership. The public realm should be managed in line with the Mayor's Public London Charter.
- In relation to the concern regarding the amount of green space in the Camden Cutting, 'Development Principle EAP 3: Camden Cutting' states that "*Open space should be integral to the infrastructure that makes this new part of city healthy, safe and convivial. Development should include a network of different publicly accessible and inclusive spaces with a range of sizes, forms and functions.*"

Design guidance

- As stipulated by NPPF, community engagement on the Design Code should follow guidance within the National Model Design Code. One of the primary purposes of the Design Code is

to ensure high-quality design for the built form and the public realm in the Camden Cutting and Euston Station and Tracks sub-areas. The National Model Design Code states that developments should take account of local vernacular, character, heritage, architecture and materials.

- The complexities of the site and the need for a common vision is picked up in section 1.1 of the EAP Update.
- In relation to sustainable building practices, the Design Strategy sets out key urban design principles including 'low carbon design'. This issue is dealt with in more depth in 'Strategic Principle EAP4 Environment' which states that the whole life cycle of the development should be low carbon with minimisation of unregulated and embodied emissions. The Environment Strategy sets out that new major developments should submit a Whole Life Carbon assessment (including operational and embodied emissions) and seek to minimise lifetime emissions.
- In relation to biodiversity, the London Plan includes Policy G6 'Biodiversity and access to nature' and the Camden Local Plan includes Policy A3 'Biodiversity'. The National Planning Policy Framework states that development plan documents (such as the EAP) should avoid unnecessary duplication of policies that apply to a particular area. It is noted that the Design Code could seek the inclusion of building-integrated biodiversity measures.

Transport Strategy

- 5.1 There were 29 Commonplace responses. In relation to the proposed updates to the Transport Strategy, 18 responses either fully agreed or mostly agreed, 6 responses were neutral (neither agreed nor disagreed) and 4 responses either mostly disagreed or did not agree at all.
- 4.31 In relation to the additional focus on pedestrian and cyclist experience and safety in the Transport Strategy, 23 responses either fully agreed or mostly agreed and the remaining 5 responses either mostly disagreed or did not agree at all.
- 4.32 There were also 11 email responses with comments on the Transport Strategy. The email and Commonplace responses are summarised below.

Summary of responses

- General support for sustainable and active travel, but there were some comments received which objected to making it harder to drive in the area.
- Support for measures that reduce air pollution.
- Suggested amendments to the text relating to the Freight Delivery and Servicing Plan and cycle routes on Whittlebury Street and east- west routes across the station to clarify that HS2 will not be providing these.
- Suggested amendments to text relating to travel mode targets, types of sustainable freight, visitor cycle parking and type of cycle parking.
- Suggest provision of another underground walking link to Euston Square Station.

Pedestrians

- Support for improvements for pedestrians, including safety improvements and improved walking routes across the Euston Area.
- Better and safer crossings and pedestrian priority across Euston Road needed.
- Support for improved pedestrian facilities and public realm along Eversholt Street.

Accessibility

- Concerns that the EAP does not sufficiently consider the needs of elderly and disabled travellers with too much focus on cycling.
- Greater focus on blind and partially sighted people who will be travelling to new Moorfields hospital.

Cycles

- Protect, enhance, and join up existing cycle routes.
- Bike hire schemes need better management as abandoned bikes are a hazard.
- Support for improved cycling facilities.
- Large-scale cycle parking facilities needed.

Taxis

- There is a need to provide a right turn into the rank from Hampstead Road, to prevent ranking around back of Amptill Estate.
- Opposition to taxi and Private Hire Vehicles ranking on Eversholt Street.

Buses

- Eversholt Street should be kept open for two-way bus routes.
- TfL provided specific comments on the provision of a suitably sized bus station that meets passenger and operational requirements for buses which should be clearly set out.
- In relation to bus facilities and that these should enhance the setting and historical context of Euston Square Gardens, concern that 'enhance' sets an unnecessarily high test.

Council Response

- The EAP Update sets out policy aspirations and the Transport Strategy is updated in line with policies in the Mayor's Transport Strategy and Camden's Transport Strategy, which encourages people to use more sustainable kinds of travel.
- While some measures set out in this document may not be provided by HS2, they may be provided by other Euston Partners. In relation to the combined Freight Delivery and Servicing Plan, the EAP Update states that this should be developed, implemented, and managed by the Euston Partnership.
- The Council will review relevant paragraphs in the Transport Strategy to take account of suggestions for textual changes relating to travel mode targets, examples of types of sustainable freight and visitor cycle parking and cycling parking stands.
- The EAP Update already seeks a new paid underground link between Euston Station and Euston Square London Underground stations and further underground links would not be feasible due to cost.

Pedestrians:

- The Euston Healthy Streets project aims to improve the pedestrian environment on the major roads around Euston.

Accessibility:

- The concern about blind and visually impaired people visiting Moorfields is

noted. Any proposed changes to the public highway would be subject to an Equalities Impact Assessment, which would assess the positive and negative impacts of the proposal on the nine protected characteristics identified in the Equality Act 2010. We will also continue to notify and try to engage the Royal National Institute of the Blind with proposed updates to the EAP and any consultations on proposed transport and public realm changes.

- London-wide data and Camden specific data shows that the majority of older people and people with disabilities make their journeys on foot or using buses. Therefore, making it easier and safer to walk and cycle in the Euston area would have benefits for older and mobility impaired people who rely on walking or cycling to make their journey. It would also help to take pressure off buses by enabling more people to make their journey on foot or by bicycle, which would be of benefit to older or mobility impaired people who rely on buses to make their journey.
- The emergency services are a statutory consultee and would, in line with the Council's standard approach, be consulted ahead of any decisions being taken to make changes to the public highway.

Cycles

- A key principle of the EAP Update is to introduce measures to promote cycling, including new routes that connect with the boroughwide network of cycle lanes.
- Figure 3.5 shows where existing cycle routes could be located, how these link into the wider network of cycle lanes proposed in and around Euston Station and that the Council is seeking to retain and enhance these existing routes.
- Shared mobility services have an important role to play in enabling more people to have access to more sustainable and active modes of travel, such as bicycles. We are working with the providers of these services to manage where their bikes are left and Camden are providing dockless bike bays, which provide a demarcated area on the carriageway for dockless bikes to be left.
- The Euston Area Plan sets out that any new developments in the Euston area should provide cycle parking in accordance with the levels set out in the London Plan. The exact location, quantity, and type of cycle parking to be provided are design features that would be picked up at planning application stage and Council-led Safe and Healthy Streets projects in the area.
- If the new Gordon Street LU tube entrance goes ahead, the Council will seek to ensure that there are some cycle parking facilities in this location. The exact number and type of cycle parking is still to be determined but this could include Sheffield stands or a mobility hub (containing shared mobility services, such as dockless bike and/ or Santander bikes).

Taxis

- Taxis are not a priority mode of travel within the road user hierarchy set out in Camden's Transport Strategy. The feasibility of providing a right-turn into the taxi rank, from Hampstead Road, is something that both TfL and LB Camden will explore and review with HS2 as part of the design development for this junction.

- The concern about private hire vehicles and taxis on Eversholt Street is noted and the revised EAP sets out clearly that a strategy for managing both taxis and private hire vehicles at Euston Station is needed to manage the volume of these modes of travel and to mitigate their impacts on the surrounding road network. The Council will seek to secure this strategy through a legal agreement as part of any applications associated with the Euston Station site and masterplan area.

Buses

- Officers acknowledge the comments raised about retaining two-way access for buses on Eversholt Street. Proposed Healthy Streets improvements for Eversholt Street, including provision of buses, is being investigated as part of the Euston Healthy Streets project being developed jointly with TfL. Proposals for Eversholt Street are still being developed and would align with the Euston Healthy Streets vision document, which broadly seeks to make it easier and safer for journeys in and around Euston Station to be made by walking, cycling and public transport (including buses). A separate public consultation would be held on any changes to Eversholt Street, providing stakeholders with a further opportunity to comment on any proposed changes to Eversholt Street before a decision is taken.
- The routing of and volume of buses serving the Euston area is outside the scope of the EAP and is being picked up through design discussions with Transport for London (TfL) and other Euston Partners.
- The EAP Update states that bus facilities should 'enhance the setting and historical context of Euston Square Gardens'. Concern has been raised that 'enhance' sets an unnecessarily high test. The EAP 2015 identified the opportunity to improve on the current bus station layout by providing a facility which contributes positively to the public realm, and to the setting of Euston Square Gardens. Given this, the use of the word 'enhance' accords with the aspirations set out by the EAP 2015.
- The operational requirements set out by TfL would need to be considered in future designs and agreements. The EAP is a policy document and, therefore, unlikely to specifically reference in detail all the operational requirements TfL have.

Environment Strategy

- 4.33 There were 17 Commonplace responses. In relation to the proposed updates to the Environment Strategy, 9 responses either fully agreed or mostly agreed, 3 responses were neutral (neither agreed nor disagreed) and 4 responses either mostly disagreed or did not agree at all.
- 4.34 In relation to the increased focus on low-carbon development, zero emission heating, resource efficiency and circular economy in the Environment Strategy, 11 responses either fully agreed or mostly agreed, 1 response was neutral and the remaining 5 responses either mostly disagreed or did not agree at all.
- 4.35 There were also 8 email responses with comments on the Environment Strategy. The

email and Commonplace responses are summarised below.

Summary of responses

- Support for minimisation of water consumption but question irrigation of planted space on roof.
- Support for local energy networks (if positioned away from sensitive areas) and better use of waste heat from trains and underground.
- Air quality on Euston Road needs to be improved.
- Greater ambition is needed on meeting net zero targets.
- More new trees and green walls as the aim should be to have as much foliage as possible.
- Need for places to park for those who cannot use public transport.
- Insufficient focus on biodiversity measures.
- Supports net zero carbon development and circular economy principles and ensuring new buildings are adaptable for future uses.
- Supports objective of minimising operational and whole life carbon emissions
- EAP should acknowledge providing SUDs on decking is challenging.
- Requested clarification on air quality standards.
- Opportunities for use of the station waste heat should be explored.
- Unclear how the cost of carbon will be determined.

Council response

- The Council's supplementary planning document 'Water and Flooding' states that details of the water used for irrigation should be provided with planning applications and *"developers will be expected to re-use rainwater where possible and also consider planting drought resistant or low water consuming plants (dry gardens)."* The concern identifying the challenge of providing SUDs on a deck above the station and tracks is noted and the text relating to this requirement will be reviewed.
- The use of waste heat from the stations and other sources is reflected in the text: *"Development above and around the station should seek to utilise waste heat from the station and other sources"*. The text relating to 'waste heat' will be amended so that it includes a reference to local heat networks.
- The concern with providing opportunities for trees and the relationship between trees and air pollution is noted. The Local Plan 2017 recognises trees and vegetation's role in filtering pollutants from the air. The EAP Update expects green infrastructure to be central to Euston's development and specifically supports extensive tree planting.
- In relation to concerns with poor air quality on Euston Road, Part D of 'Strategic Principle EAP 4: Environment' states that *"Euston Road is identified as an Air Quality Focus Area and will use sustainable and innovative development which delivers a low or zero emission neighbourhood. Development proposals should address and mitigate air quality issues"*.
- A concern has been raised that the Environmental Strategy is not sufficiently detailed or ambitious enough to meet the UK's net zero target. Euston presents a significant opportunity to deliver net zero carbon sustainable development through a balance of minimising energy demand through design and energy efficiency measures, low carbon and zero emission technology, and renewable energy generation. The EAP provides a policy framework for development over a 20+ year plan period. If the policy included more detailed specific requirements, for example setting minimum on-site reductions for CO₂, such targets would quickly become outdated as technology progressed

and building regulations became stricter. The promotion of net zero carbon is a demanding target without repeating the more specific targets set out in the London Plan. The inclusion of more prescriptive and less flexible policies would not reflect the evolving nature of zero carbon building policy and there is a concern that more demanding policies would go beyond the current evidence base as well as national policy.

- The Open Space chapter emphasizes the importance of ecology and biodiversity and includes detailed expectations for biodiversity. Proposals are encouraged to apply the most effective greening measures using semi-natural vegetation, wetland or open water, green roofs and green walls, and flower-rich perennial planting. Proposals at Euston would also need to comply with Local Plan Policy A3 Biodiversity and should follow guidance set out in the supporting SPD CPG Biodiversity.
- In relation to concerns that parking should be provided for those who do not wish to use public transport, development at Euston is expected to be car free. A suitable level of blue badge parking to support the proposed land-use mix will need to be provided. On-site parking would be limited to spaces designated for disabled people. This is in line with the London Plan's strategic aim to reduce Londoners' dependency on cars in favour of increased walking, cycling and public transport use. Without this shift away from car use London cannot continue to grow sustainably.
- Clarification has been requested on the text which relates to air quality standards. The Air Quality CPG was adopted before the WHO 2021 update and therefore needs to be updated. The standards referred to in the EAP Update relate to the most up to date WHO Air Quality Guidelines and the commitments set out in the Camden Clean Air Strategy 2019-2034 / Clean Air Action Plan 2023-2026.
- In relation to carbon offsetting, it is proposed that opportunities for carbon savings are explored across the wider Euston area as a local offsetting alternative to carbon offset payments which should be equal to the cost of delivering carbon reduction onsite. There is significant potential for energy efficiency improvements and renewable energy systems across the Regents Park Estate as an example.

Open Space Strategy

- 4.36 There were 20 Commonplace responses. In relation to the proposed updates to the Open Space Strategy, 9 responses either fully agreed or mostly agreed, 3 responses were neutral (neither agreed nor disagreed) and 7 responses either mostly disagreed or did not agree at all.
- 4.37 In relation to the suggested principles for open space, 10 responses either fully agreed or mostly agreed, 4 responses were neutral and the remaining 5 responses either mostly disagreed or did not agree at all.
- 4.38 There were also 11 email responses with comments on the Open Space Strategy. The email and Commonplace responses are summarised below.

Summary of responses

- Support principle of all open space being welcoming and accessible.
- Additional principle that open spaces should receive good amounts of sunlight throughout the day suggested.

- Support the design principles for open space.
- Quantum of replacement open space is insufficient.
- The EAP needs to strengthen approach to how HS2 Ltd propose to mitigate the open space lost to the scheme.
- Open space must be genuinely open to the public, not as de-facto gardens for new-build blocks, and should be genuinely green, not delivered as hard surfaces.
- Accessibility and biodiversity should be key aspects of all new open space.
- Requested publication of Open Space analysis. Stressed that Somers Town has lost a disproportionate amount of green space, mature trees and play areas.
- Call for balance between residents' needs and biodiversity.
- Support for new open space, but concern that placing the open space on the roof will act as a physical and mental barrier to local people.
- Strong support for open space and for lost green space to be replaced in full.
- Clearer distinction needed between different kinds of open space on diagram.
- More details on incorporating biodiversity in development needed.
- Call for swift bricks to be included in development.
- Support for replacement open space and integration of green links with Bloomsbury.
- Text and illustration of HS2 replacement open space needs revising. A minimum quantum of replacement open space is not outlined in the HS2 Act or EMRs.

Council response

- The Council intends to publish the Open Space Study.
- Open space will be expected to be delivered in line with Camden's Local Plan policy which will be supported with private amenity space including balconies and green roof space. New open spaces would be expected to be publicly accessible and to feel and function as public open space irrespective of their ownership or management responsibility and to be managed in line with the Mayor's Public London Charter.
- The Council considers mitigation for the open spaces lost as a result of HS2 as a key strategic priority which is set out clearly in the EAP Update.
- A concern has been raised about the accessibility of new open spaces above the station, the height of which could act as a physical and mental barrier to local people. Open space associated with the new development is proposed above the station with the aim of helping to create a sense of place and to attract people on to this level. The EAP Update recognises the importance of ensuring that spaces are as accessible as possible and states that development above the station should ensure that a diversity of users are welcome and encouraged to use the place.
- The concern that open space must be genuinely public and not dominated by new build development is noted. The EAP Update addresses this concern in 'Principle for Open Spaces' which states that *"In all locations and contexts, spaces should be designed, delivered and managed to be as welcoming, inclusive, and as accessible as possible and clearly available for use by all members of the public"*.
- In relation to the concern that green spaces should be genuinely green and not dominated by hard surfaces, the EAP Update seeks a range of new open spaces appropriate to the needs of potential users, location and local character, including larger public open spaces, civic spaces and public realm, play space and local green spaces. There is an expectation that civic spaces will be landscaped with greenery and

planting to the greatest degree possible. It is noted that the Council's Public Open Space planning guidance includes the following: *"Given the amount of hard surfaces in Camden, our priority will generally be for green spaces. The Council will generally not support public open space dominated by hard landscaping unless the need for this can be strongly justified"*.

- It will be for the detailed design of the development plots to show how they will provide open space and meet the requirements of planning policy. The 'Open Space network illustration' aims to show the network of spaces that should be delivered.
- In relation to biodiversity and bird boxes, the Council's Biodiversity guidance sets out biodiversity enhancement measures that should be considered as part of planning applications, and this includes the provision of bird boxes. Habitat creation would need to respond to the specific site context.
- The re-provision of public open space lost as a result of HS2 is a key priority for the Council and the EAP Update seeks to ensure that it is replaced in accordance with HS2's assurances and Environmental Statement. In relation to the 'Open Space network illustration', the Council will continue to test its assumptions of where open space can be provided with the project partners including HS2.

Euston Station and Tracks

- 4.39 There were 11 Commonplace responses. In relation to the proposed updates to the development principles for Euston Station and Tracks, 2 responses mostly agreed, 2 responses were neutral (neither agreed nor disagreed) and 6 responses either mostly disagreed or did not agree at all.
- 4.40 There were also 12 email responses with comments on the Euston Station and Tracks section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses

Illustrative masterplan

- Should there be a distinction between cycle facilities i.e. stands only and 'hubs' where other services might also be provided.

Buses

- Move bus station [no suggestion provided].
- Change of wording related to bus station is needed to ensure it can operate effectively and efficiently. Suggested amendments to Illustrative Masterplan in relation to current location and space indicated for bus station.

Routes and permeability

- Need for East-West cycle route across the station site to improve East-West connectivity.
- Supportive of comprehensive approach to development at both Euston and HS2, but greater emphasis could be placed on the importance of 'open' at-grade north-south routes (i.e., not through or above a station).

Euston Area Plan Update | **Consultation Statement**

- Polygon Road connection is not feasible so alignment via Barnby Street should be shown on illustrations instead.

Servicing

- Concerns with how servicing would be managed. The EAP should provide text and diagrams in relation to servicing of the stations and development.

Euston Square Gardens

- Euston Square gardens should be gardens, not a substitute piazza.
- Concern that a tall building at the front of the NR station would not positively contribute to Euston Square Gardens.

Housing

- Question the provision of 'genuinely affordable' housing in an expensive area.
- Objections to prioritisation of conventional housing over student housing*.
- Development proposals should assist those with disabilities especially those who are blind or sight impaired.

HS2

- HS2 raised concerns with the illustrative masterplan pointing out that certain elements were not feasible or applicable to HS2. They also:

* This comment was also made in response to the Land Use Strategy section and the Council's response is provided in that section

- Requested clarifications on text.
- Suggested that key routes should recognise and reflect the routes that are included in the emerging HS2 station design.
- Suggested there is a need for a taxi drop-off facility on Eversholt Street.

Protecting views

- Clarification needed in relation to massing being 'stepped back'.
- The avoidance of harm is an unnecessarily high test.

Taxis

- Request for private hire vehicles (PHVs) to be given the same access as taxis to decrease congestion on Eversholt Street.
- Notes that taxi facilities provided by HS2 should be in accordance with requirements set out in the Hybrid Bill and question if different approach is needed for black cabs and PHV.

Infrastructure

- Greater consideration of how to integrate necessary rail infrastructure – vents, plant – from different operators into a successful public realm needed.

Viability

- Clarity needed on statement relating to viability and application of flexibility in planning policies.
- The EAP Update states that new and replacement housing would be focused in the Euston Station and Tracks and the Camden Cutting sub areas, subject largely to the feasibility of decking opportunities. Our understanding is that the Camden Cutting, which could deliver housing, is not reliant on decking opportunities.

Council response

Illustrative Masterplan

- In relation to the concern that different types of cycle parking facilities should be defined, the exact type of cycle parking will be established at a later stage through the design and planning approval process.

Buses

- While at present, TFL have identified the southeastern corner of the station campus as the only suitable location for the bus station from an operational perspective, the EAP will continue to promote a facility that considers the importance of placemaking and will support alternative locations if these emerge through the feasibility process, subject to these complying with TFL's operational requirements. The supporting text to Fig 3.5 states the bus facilities need to meet various requirements including that it should enable ease of movement through this part of the Euston station site and it should enhance the setting and historical context of Euston Square Gardens. This includes a desire to improve east-west connectivity in this location.
- The text relating to bus station will be reviewed and updated where appropriate noting that operational requirements will need to be considered as part of the design process

Routes and permeability.

- In relation to placing greater importance on 'open' at-grade north-south routes (i.e., not through or above a station), the EAP recognises that improvements will be made to Eversholt Street and Hampstead Road as part of the Euston Healthy Streets project and Cobourg Street is identified as providing an improved north / south cycle route.
- Improving connectivity remains a key objective of the EAP Update. The Council's aspiration for enhanced east west routes remains, and where it is not feasible to provide these straight away, the Council will aim to safeguard options to allow for future enhancements to connectivity.

Servicing

- The EAP highlights the need for a combined Freight Delivery and Servicing Plans for the station site, including both stations and over site development, to specifically encourage out of peak travel freight deliveries, and freight movement efficiencies. Measures to deliver sustainable freight and servicing should include minimising the need

for freight vehicles to serve the station or surrounding development. It is anticipated that any freight and servicing infrastructure would be within the confines of the station.

Euston Square Gardens

- The EAP Update recognises the importance of Euston Square Gardens and specific guidance is provided for its. The EAP Update identifies opportunities for public space at the front of the station which should help to alleviate pressure on the use of Euston Square Gardens.
- The concern with a tall building at the front of the station is noted. Locations for taller buildings were identified in the EAP 2015 and included a potential location at the front of the stations. It should be noted that the development potential for a building up to 55m would be lower than the now demolished One Euston Square.

Housing

- The provision of affordable housing in an 'expensive' area would ensure that Euston remains a mixed and inclusive place. This accords with London Plan policy GG4 which seeks to create a housing market that works better for all Londoners and to create mixed and inclusive communities.
- The Council's guidance 'Access for All' states that: "the Council will expect developers to ensure good quality access and circulation arrangements for all pedestrians, regardless of level of mobility, any sensory impairment, learning difficulties or dementia."
- The draft EAP allows for a proportion of student housing as part of the overall housing mix. However, Camden Council's overall priority is to maximise the provision of housing units as permanent homes to meet local housing needs.

HS2

- The EAP is a strategic document which sets out the objectives for the area, including new routes connecting communities on either side of the station. Designs for the new or redeveloped stations will need to consider how it will help to deliver this objective.
- Comments in relation to the feasibility of specific design elements of the HS2 station will need to be reviewed when more information is made available but for now the objectives are likely to remain as they are. As part of any application HS2 Ltd. should provide evidence demonstrating why active frontage cannot be provided. In addition, there is an Assurance that the Secretary of State will require the Nominated Undertaker to design HS2 Euston Station, so far as is reasonably practicable, having regard to all relevant parts of the Euston Area Plan.

Protecting views

- The reference to stepped back is in relation to a development's main frontage(s). This is a standard urban design principle. Setbacks at upper floors reduce a building's impact at street level by allowing one or more upper storeys to be less visible from the street.

- Carefully siting development to avoid harm is in accordance with London Plan Policy 7.12A.

Taxis

- The EAP Update recognises improvements could be made to taxi and PHVs management at Euston and states that: "A strategy for managing taxis and private hire vehicles and their supporting facilities should be developed, implemented and managed by Euston Partners, to ensure taxis are not being over provided for or over ranking on the public highway". The exact detail of how taxis and private hire vehicles would be managed would need to be addressed by any future station proposals by HS2 and NR. The operation of the taxi rank would be within the scope of matters that will be considered by the Council in a future HS2 schedule 17 planning application.
- The EAP Update recognises that it may be necessary to make some provision for taxi and PHV drop-off of mobility impaired passengers along Eversholt Street. However, overall, the EAP Update seeks to ensure there is no over provision of ranking space across the Euston campus and that ranking facilities are provided on site, not on the public highway.

Infrastructure

- In relation to the integration of railway infrastructure into the public realm, the EAP Update includes the following: "The roof will likely be required to accommodate station plant and glazing. These elements should be well incorporated into the overall masterplan and not have a detrimental impact on the usability or quality of public space on the roof".

Viability

- The statement that "Camden's planning policies apply flexibility in setting out planning requirements, in order to take into account viability and other constraints" remains unchanged from the adopted EAP 2015. Providing a flexible framework helps to ensure that the Council's vision and objectives for the area are delivered.
- Only the plot on the north-eastern side of the railway and adjacent to Hampstead Road (former site of Addison Lee) does not require decking. The other plots are either above HS2 or NR infrastructure and will require enabling works to provide a deck level with the surrounding streets.

Euston Road

- 4.41 There were 9 Commonplace responses. In relation to the proposed updates to the development principles for Euston Road, 5 responses fully agreed or mostly agreed, 1 response was neutral (neither agreed nor disagreed) and 3 responses either mostly disagreed or did not agree at all.
- 4.42 There were also 6 email responses with comments on the Euston Road section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses

- Support for the reinstatement and improvement of Euston Square Gardens and for the principle that the bus station should not negatively impact on the Gardens; suggested change to heritage text so that it recognises the importance of heritage assets including British Library, Nettlefolds and the post office building.
- Bus station should be moved due to its impact on Euston Square Gardens^{*}.
- Links to Euston Square underground must be significantly improved^{**}.
- Secure cycle parking is needed.
- Suggested amendments relating to removal of trees, impact of utility works on replanting of trees, cycle parking on Gordon Street^{**}, and the London Squares Preservation Act.
- Suggest Network Rail should also contribute to improving and introducing road crossings and that noise mitigation can only be delivered through substantial landscaping.
- Support for Healthy Streets approach and land use priorities including knowledge economy uses and active frontages at ground floor level.
- The requirements for delivering a successful bus station need to be set out clearly so that any trade-offs can be fairly considered and assessed. Suggested amendments to the Illustrative masterplan, including location of bus station. Noted that pedestrian and cycle improvements should follow Healthy Streets design principles.
- Euston Road is an important corridor for freight traffic, so the removal of freight movements could displace such traffic to local roads.

Council response

- The Euston Road chapter of the EAP Update includes specific guidance on Euston Square Gardens and states 'the 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.'
- The heritage text in the context section will be reviewed to ensure this include all relevant heritage assets. The reference to British Library will be updated to clarify this is Grade I listed.
- It is acknowledged that the HS2 Act enables removal of trees and that some have already been removed. In relation to the presence of utilities below the gardens, the EAP Update calls for the full restoration of the Euston Square Gardens, and notwithstanding the presence of utilities, this objective remains paramount.
- In relation to HS2 works and the London Squares Preservation Act 1931, the EAP Update refers to the reinstating of the gardens following the HS2 works. The HS2 Act only disapplies the London Squares Preservation Act 1931 with respect to HS2 works.
- In relation to the concern regarding landscaping and noise mitigation the EAP Update refers to the delivery of a greener environment with tree planting, landscaping and planters to mitigate noise and air quality issues along Euston Road. The approach remains unchanged from the adopted EAP 2015. While planting and planters are not expected to mitigate noise, they are likely to be beneficial for air quality.
- In relation to improving / introducing new road crossings, Development Principle EAP 2C will be amended and a reference to Network Rail added.
- Improvements to Euston cycle parking would be brought forward by Project Partners: HS2, Network Rail and Lendlease.
- In relation to the provision of a bus station and the competing

demands for space, Camden will continue to work with TfL to find a solution to bus provision at Euston. As Euston Square Gardens are a protected London square, any such solution must take this into account.

- The EAP Update says opportunities should be sought to reduce and remove freight along Euston Road. The consideration of such opportunities would need to examine any impacts including the displacement of freight traffic onto local roads.

* This comment was also made in response to the Euston Station and Tracks section and the Council's response is provided in that section.

** These comments were also made in response to the Transport Strategy section and the Council's response is provided in that section.

*** These comments were also made in response to the Transport Strategy section and the Council's response is provided in that section.

Draft

Camden Cutting

- 4.43. There were 30 Commonplace responses. In relation to the proposed updates to the development principles for Camden Cutting, 3 responses mostly agreed, 4 responses were neutral (neither agreed nor disagreed) and 22 responses either mostly disagreed or did not agree at all.
- 4.44 There were also 12 email responses with comments on the Camden Cutting section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses

- Support for provision of open space and greening in and along the Cutting, including at Mornington Street bridge and Park Village East.
- Langdale open space should be prioritised for open space, not development.
- Regret for loss of proposed large open space to the North of Mornington Street Stressed that pocket or linear parks where most of the surface is paved should not count as required green space^{*}.
- Concern over proposed building heights in the Cutting.
 - Concern that development to rear of the Mornington Crescent would impact neighbouring amenity.
 - Objections to five-storeys adjacent to Park Village East with up to 12 storeys adjacent to the railway line, and development along Mornington Terrace. New buildings should not be higher than existing buildings.
 - EAP is vague on heights so open to developers' interpretation. Height on maps should be reduced.
- Development should respect the historic context and character of the area regarding sense of space, building materials, architectural style and viewing channels. More consideration should be given to existing heritage assets on either side of the cutting. Support for retention of existing railway Cutting walls and their incorporation into new development.
- Support the provision of new, affordable workshops.
- Prioritise affordable housing. More detail on proposed private, social and affordable housing mix^{**} and services to support this. New housing should be targeted towards those most in need.
- Given the extended period of the EAP, concern that there is a lack of certainty in the development plan. Concern with the long period of disruption.
- Proposals for Langdale open space should be clarified. Comment about demolition already undertaken, suggested amendments to Camden Cutting Illustrative Masterplan (relating to enabled land and headhouses) and that NR should also be mentioned in Delivery Strategy phasing section. Object to Camden's continued commitment to decking of additional areas in the Cutting, as no more public funding or investment will be made available.

^{*}This comment was also made in response to the Open Space Strategy section and the Council's response is provided in that section.

^{**} This comment was also made in response to the Land Use section and the Council's response is provided in that section.

Council response

- The support for open space rather than development on 'Langdale open space' is noted.
- In relation to the request for clarification of the Council's approach to 'Langdale open space', it is noted that since the time of the hybrid bill, part of the Z-plot area has always been identified as having some development potential alongside open space. With HS2 redesigning their station it will be necessary for them to consider how they will provide appropriate open space mitigation and so it will be necessary to consider this plot as part of this larger conversation, including the quality of open space that could be delivered in this location.
- The call for the strengthening of the weak aspiration for public open space to the north of Mornington Street Bridge is noted. However, the EAP Update needs to balance the Council's aspirations for open space to the north of the Cutting with the known funding and engineering constraints. Proposals in the EAP Update need to be deliverable. While the EAP Update recognises that decking in this area falls outside current funding commitments, this may change in the future. It is not possible to rule out private investment or categorically rule out future public funding as political priorities may change over time but at this point, we understand that it is very unlikely that it will be delivered.
- The objection to building heights adjacent to Park Village East is noted. The EAP 2015 set out potential general building heights in the Cuttings and provided indicative heights of 4-10 storeys adjacent to Park Village East. The heights are indicative only and the supporting text states "there may be impacts on local heritage assets, local views and context which would need to be addressed". Accurate Visual Representation would be required to support future development to demonstrate that the proposal does not unacceptably impact local views or heritage assets. It is noted that in the EAP 2015 heights stepped down south to north and also east to west. The EAP Update continues this approach.
- The illustrative masterplan showing potential general building heights will be reviewed and comments related to specific sites will be considered. Proposals will need to submit a detailed assessment demonstrating that the proposal would conserve the significance of heritage assets and have an acceptable impact on neighbouring occupiers' amenity.
- The concern with development on the northern part of Mornington Terrace is noted. Historically, Mornington Terrace would have been a two-sided street with a terrace of properties to the west of the existing Mornington Terrace. In 1906 the railway cutting to Euston was widened and this western terrace was demolished. The reference to 'completed' as a two-sided street relates to the original layout being restored. The EAP Update notes residents' concerns with potential loss of light and street trees and states: "A detailed design and engagement process which involves working with residents neighbouring the site will be essential in order to establish the scale, massing and detailed appearance to ensure an appropriate response to context and to respond to the concerns highlighted."
- The concern that new development should not be higher than existing buildings is noted. Development Principle EAP 3 states that "development proposals should be sensitive to the historic context and seek to preserve and enhance the setting of heritage assets through sensitive design and scale".
- In relation to the comment that weight should be given to the sense of space, viewing channels and historic context, it is noted that the anticipated extent of decking over the tracks has been reduced since the adoption of the EAP in

2015.

- The EAP Update text will be amended to clarify that railway cutting walls and parapets should be retained where possible provided this contributes to place making.
- In relation to services to support the additional housing, the EAP Update considers schools and concludes “based on current population trends and existing and potential future capacity in local schools, it is expected the level of growth outlined in this plan can be accommodated in existing facilities to be funded through CIL [Community Infrastructure Levy] contributions”. In relation to doctor’s surgeries, the expectation is that existing facilities surrounding the Euston area will be expanded. There should be sufficient provision of other community facilities to support new development so that additional demand does not place unacceptable pressure on existing community facilities. Contributions towards the provision of such community facilities will be expected.
- In relation to the ‘certainty’ of the development plan, delivering development sites in the Cuttings area is less challenging than delivering sites over the station and tracks and this is likely to improve the deliverability of sites in the Cutting in earlier phases. The concern with the long period of disruption is noted and the Council will continue to work with Project Partners to ensure disruption and disturbance is kept to a minimum.
- The context section will be amended to clarify that the demolitions needing in connection with HS2 have already taken place.
- It is acknowledged that development above the HS2 tracks immediately to the north of Hampstead Road bridge is not currently technically feasible and Figure 4.6 Illustrative plan is annotated to clarify that this plot is 'not within current funding plans'. Officers will review whether the site immediately to the south of Granby Terrace should also carry this annotation. Officers acknowledge the constraints of developing above the portal headhouse and will review the deliverability of this site.
- The phasing section will be updated to clarify that some plots will require Network Rail enabling.

3. Drummond Street and Hampstead Road

- 4.45 There were 7 Commonplace responses. In relation to the proposed updates to the development principles for Drummond Street and Hampstead Road, 4 responses fully agreed or mostly agreed, 1 response was neutral (neither agreed nor disagreed) and 2 responses did not agree at all.
- 4.46 There were also 11 email responses with comments on the Drummond Street and Hampstead Road section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses

- Objection to removal of parking along Cobourg Street due to concerns over impact on existing businesses, residents, visitors and services. Pedestrianisation raises concerns about access for those with disabilities and limited mobility.
- Support transformation of Hampstead Road as part of the Euston Healthy Streets project, improving connections to Drummond Street and enhancing building frontages.
- Concern that noise mitigation could not be achieved through planting alone.
- Support for provision of one single consolidated taxi rank for Euston Campus.

Council response

- Any proposed transport changes including potential parking removal would be developed in alignment with the policies in Camden's Transport Strategy. All streets west of the HS2 station will need to be considered holistically for traffic routing, traffic-calming measures, walking and cycling improvements and parking restrictions. Any changes proposed on Drummond Street, Cobourg Street or other streets would be subject to a public consultation and would undergo an Equalities Impact Assessment, which includes assessing the impacts of any proposed changes on people with disabilities.
- In relation to the 'Greening of Hampstead Road', the text will be amended to clarify that tree planting can contribute to the mitigation of air pollution, rather than noise pollution.

4. Regent's Park Estate

- 4.47 There were 14 Commonplace responses. In relation to the proposed updates to the development principles for Regent's Park Estate, 2 responses mostly agreed, 3 responses were neutral (neither agreed nor disagreed) and 6 responses either mostly disagreed or did not agree at all.
- 4.48 There were also 5 email responses with comments on the Regent's Park Estate section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses

- Support for improved walking and cycling routes (including to Regents Park); improved access for disabled and visually impaired as well as those with prams.
- Support the provision of green space on Park Village East, Mornington Street bridge, and Langdale open space.
- Support for retention of existing railway cutting walls and their incorporation into new development.
- Concern regarding additional replacement housing on the estate, need to preserve sense of openness and natural environment of the area.
- Concerns regarding loss of Regents Park Children's Centre.
- Support for introduction of Healthy Streets projects to improve air quality.
- Support for more Electrical Vehicle (EV) charging points.
- Support improvement of shopfronts on Robert Street.

Council response

- The Council notes the comments relating to additional housing and the impact it could have on the openness of the Regents Park Estate. Any proposals for new housing would need to be developed through exploration and engagement with the local community.
- Euston Healthy Streets' scope includes Hampstead Road, which will focus on reducing air pollution and noise. The funding Camden has secured from the HS2 Road Safety Fund will be used to improve and enable low- emission forms of travel in the Regent's Park Estate, particularly walking and cycling, which could also contribute to reducing air pollution on the Regent's Park Estate.
- The Draft EAP Update recognises the importance of inclusivity and

aims to deliver "a sustainable transport system and streets that are accessible and inclusive for all" (Strategic Principle EAP 3: Transport).

- The EAP review refers to the potential relocation of the Regents Park Children's Centre within the estate. If the existing site was redeveloped, it would be necessary to find a new home for the centre on the estate and existing facilities improved on. This would be permanently secured as part of a legal agreement.
- The support on various points is noted and welcomed.

5. Amptill and Mornington Crescent Station

- 4.49 There were 8 Commonplace responses. In relation to the proposed updates to the development principles for Amptill and Mornington Crescent Station, 2 responses mostly agreed, 3 responses were neutral (neither agreed nor disagreed) and 3 responses either mostly disagreed or did not agree at all.
- 4.50 There were also 4 email responses with comments on the Amptill and Mornington Crescent Station section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses

- Request for fenced area for dog use to reduce impact of dog-fouling on Amptill.
- Amptill Estate Square should be accessible to public during the day and secure at night to mitigate antisocial behaviour.
- Traffic to Euston Stations should remain on Hampstead Road and not cut through the Estate.
- Improve pedestrian experience of Hampstead Road, provide more green space, and an integrated design for Harrington, Amptill and Hampstead Park Road.
- Support for high-quality paving on Amptill square, Mornington Crescent Station, wider pavements, street benches and shops.
- Suggest text should reflect that homes lost to HS2 have already been identified and demolished.

Council response

- The provision of a fenced off area for dog use does not fall within the scope of the EAP but this concern will be relayed to the relevant team.
- Comments on traffic through the estate are noted. There are currently no proposals for traffic to cut through the Amptill Estate.
- The draft EAP Update seeks to ensure that Hampstead Road will be transformed to provide a more pleasant and accessible street environment drawing on the design principles from the Euston Healthy Streets project.
- The phasing text will be updated to clarify that housing on Regent's Park Estate has been lost to HS2.

6. West Somers Town

- 4.51 There were 16 Commonplace responses. In relation to the proposed updates to the development principles for West Somers Town, 4 responses fully agreed or mostly

agreed, 5 responses were neutral (neither agreed nor disagreed) and 3 responses either mostly disagreed or did not agree at all.

- 4.52 There were also 8 email responses with comments on the West Somers Town section of the EAP. The email and Commonplace responses are summarised below.

Summary of responses

- Request clarification on "Healthy Streets Project" and meaning of "renewal and intensification" and "new open space to support any housing intensification".
- Concern regarding amount of traffic on Eversholt Street and Euston Road.
- Call for green, better public spaces on Eversholt Street and Euston Road and improvement to west side of Eversholt Street.
- Concern that heritage is not mentioned among key points and highlight heritage role of Somers Town People's Museum.
- Concern regarding plans for Seymour House and demolition of Eversholt Street and Edith Neville Cottages.
- Notes historical and architectural importance of Churchway Estate and need to preserve it. Concern boundary of Churchway Estate is unclear, call for commitment to retain and retrofit locally listed buildings.
- Opposition to opening of a walking and cycling route through Lancing Street to Churchway due to antisocial behaviour.
- Suggested walking links to King's Cross needs to be further south as Phoenix Road will be used by minority of people walking between the stations.
- Concern raised that proposed walking and cycling routes do not consider needs of disabled independent car users^{*}.
- Keen to highlight delivery of Somers Town Future Neighbourhood priorities.
- Concern with how packaging could be tackled strategically to reduce littering.
- Concern regarding proposed building heights along Eversholt Street, request building heights closest to street lowered to limit light loss and call for design that reduces street air pollution^{**}.
- Support retention of bus station south of Network Rail station provided its impacts are taken into account, highlight importance of buses for those with mobility needs and the need for buses travelling in both directions along Eversholt Street^{***}.
- Call for better management of station traffic on Eversholt Street, object to taxi ranks on Eversholt Street and suggest drop offs limited to those with mobility issues. Suggest need for taxi strategy, HS2 provided taxi rank should be main taxi facility for Euston campus; Mayor's Transport Strategy prioritises buses over taxis, and this should be reflected in policy and subsequent designs for the site.
- Welcome new emphasis on Eversholt Street, request additional text referencing Eversholt Street heritage assets.

^{*} This comment was also made in response to the Transport Strategy and Environment Strategy section and the Council's response is provided in those sections.

^{**} This comment was also made in response to the Design Strategy section and the Council's response is provided in that section.

^{***} These comments were also made in response to the Transport Strategy section and the Council's response is provided in that section.

Council response

- Euston Healthy Streets is a joint project being developed and delivered by TfL and Camden, the strategic vision for this project was consulted on and published in 2021. The purpose of this project is to carry out a strategic review of the streets surrounding Euston Station (Eversholt Street, Hampstead Road and Euston Road), in order to enable these streets to respond to regeneration and changing travel demands, in a way that is sustainable and meets Healthy Streets objectives. Camden and TfL are now jointly developing designs to meet the objectives of the Euston Healthy Streets vision and integrate with HS2's works in the area. Any proposed changes would be publicly consulted on, providing further opportunity for comment on these proposals.
- The concern with the amount of traffic on Euston Road and Eversholt Street is noted. The Euston Healthy Streets Vision will help to improve the quality of these streets through greening and safety improvements for cyclists and pedestrians. The EAP Update will help to deliver the Euston Healthy Streets Vision.
- The concern with the western side of Eversholt Street is reflected in the EAP Update which seeks to make Eversholt Street a vibrant route with shops and ground floor active frontages on both sides of the street.
- A concern has been raised about the meaning of “renewal and intensification” in relation to the Churchway Estate. The aim of investigating opportunities for the renewal / intensification of the Churchway Estate remains unchanged from the EAP 2015. The ‘intensification’ of Churchway relates to the possibility of further housing on the estate. The Council will work with residents and the community to test the potential for the renewal/intensification of the estate. Camden has a resident-led approach to estate regeneration and a resident ballot is a pre-condition for funding support from the Mayor of London. There are no specific proposals at this stage and the Council's policy is to seek to ensure that the repurposing, refurbishment and re-use of existing building/s is prioritised over any demolition. The text which relates to the Churchway estate will be reviewed to ensure it is comprehensive and clear.
- Clarification has been requested in relation to open space being provided to support any housing intensification. New open spaces should be provided as part of new development to ensure that development does not put unacceptable pressure on the Borough's network of open spaces in line with Local Plan policy.
- The Churchway Estate includes locally listed buildings within or around it, including Wellesley House, Winsham House and Seymour House. The Council seeks to protect non-designated heritage assets (including those on the local list).
- The concern with preserving working class heritage and the role of the Somers Town People's Museum is noted. The EAP Update does highlight that “the area is adjacent to Edwardian and inter war social housing blocks of historic importance”. The context section will be reviewed to ensure that heritage assets are sufficiently considered.

- Edith Neville Cottages and part of Eversholt Street are in the area safeguarded for Crossrail 2. Although Crossrail 2 is currently unfunded the area remains safeguarded. Should construction go ahead, part or all of these sites could be redeveloped and would be expected to contribute to the aspirations of the EAP Update set out in West Somers Town chapter.
- The concern that proposed walking route needs to be moved further south, as more people use Euston Road than Phoenix Road to walk between Euston and King's Cross Stations, is noted and improvements to both Phoenix Rd and Euston Road will be brought forward as part of the delivery of the EAP.
- The EAP Update recognises the importance of inclusivity and aims to deliver "a sustainable transport system and streets that are accessible and inclusive for all" (Strategic Principle EAP 3: Transport). Car users with restricted mobility will continue to be provided for.
- The Euston Healthy Streets programme and the Greening Phoenix Road project align with and would help to deliver the priorities of the Somers Town Future Neighbourhood 2030 Programme (STFN) and the STFN strategy will inform local interventions in this area.
- The suggestion of reducing littering by addressing packaging across the Euston Estate is noted. Sustainability is a key objective of the EAP and development at Euston is expected to support circular economy principles. Development brought forward by partners would be expected to contribute to this objective. Waste minimisation and waste avoidance is a fundamental part of the circular economy.
- Support noted for buses and concerns with station traffic on Eversholt Street will be addressed in the development of the Euston Healthy Streets programme.
- In relation to taxis, the EAP Update states "It may be necessary to make some provision for the drop-off of mobility impaired passengers along Eversholt Street. Any provision will need to be carefully designed and managed to ensure that it does not negatively impact on pedestrians or cyclists". However, overall, the EAP Update seeks to ensure there is no over provision of ranking space across the Euston campus and that ranking facilities are consolidated and provided on site, not on the public highway.
- The revised EAP sets out clearly that a strategy for managing both taxis and private hire vehicles at Euston Station is needed to manage the volume of these modes of travel and to mitigate their impacts on the surrounding road network.
- In relation to the concern with height on Eversholt Street, the EAP Update states that development on the east and west sides of Eversholt Street should provide a transition from Somers Town to the station environment, reflecting elements of the residential neighbourhood's grain, street rhythm, articulation, materiality and variety.
- Impact details on sunlight and daylight as well as air quality will need to be tested during the pre-application process for all development to ensure proposals are policy compliant. The EAP states: As required under policy Camden Local Plan Policy A1 Managing the impact of development DP26 of the Camden Development Policies, development should not harm the amenity of occupiers and neighbours, including in relation to noise, air quality, sunlight and daylight, overshadowing and outlook, and visual privacy and overlooking.
- Historically Lancing Street connected to Churchway. The route runs through the Churchway estate and so its delivery would be linked to

Council discussions with residents on future options for the estate, including concerns related to ASB.

- The residential nature of Somers Town is noted in the context section of this chapter. The overall strategy of the EAP Update is to focus growth and development at Euston Station, Camden Cutting and Regent's Park Estate.
- In relation to buses and the Mayor's Transport Strategy, the EAP Update states that "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 the Mayor's Transport Strategy". The Camden's Road User Hierarchy reflects the Mayor's Transport Strategy with buses prioritised over taxis.

7. Delivery and Viability

- 4.53 There were 4 email responses with comments on the Delivery and Viability section of the EAP and these are summarised below.

Summary of responses

- Question approach to viability, including the effective deferral of considering viability until the application stage. View that 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.
- Reference should be made to weight of viability assessment alongside other material considerations, ensuring that developments remain acceptable in planning terms, it should be tested rigorously and undertaken in line with the Mayor's Affordable Housing and Viability SPG. Greater emphasis could also be given to features of the statutory planning framework and how they can address viability concerns on a site-by-site basis and on the potential for other sources of funding potentially being available.
- The 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.
- In relation to the determination of planning applications and assessment of viability, there is no need to specifically refer to increased building heights nor to general flexibility towards policy as

doing so would not change the statutory approach to decision-making but could create a false impression that it would.

Council response

- 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. As part of these tests, it will be necessary to demonstrate the viability of the updated EAP. Given the unique nature of the proposals at Euston and the abnormal costs associated with developing over a railway and tracks, understanding and assessing the viability of such a scheme has proved difficult. A high-level assessment has therefore been completed using the best information available at the time.
- The EAP recognises that development above new and existing station facilities will face challenges that are distinct from more typical at grade sites and these need to be considered as part of the viability assessment. The cost of providing a deck to support development above the HS2 station and tracks has been considered as part of high-level viability testing for this plan. It is acknowledged that some flexibility in applying development plan policy may be required to acknowledge the specific circumstances of individual planning applications, as they are judged on their own merits. Wording in relation to viability will be reviewed.
- The content and proposals in the EAP need to be capable of being delivered by a developer or through government funding. Therefore, the plan proposals have been (and will continue to be) developed to respond to existing national and regional policy, costs, physical constraints (where information is available) and bearing in mind technical requirements of key stakeholders and landowners. Given the Network North announcement and the need to revise the station design, it is difficult to reflect accurate proposals given the lack of maturity, testing of emerging designs and sign-off of proposals.
- The EAP will be updated based on reasonable assumptions, setting out clear objectives and ambitions. It will be important to strike a balance between ambition and the current reality around funding, noting the opportunity that careful design and investment provides to create value. In updating the EAP, phasing will need to be considered and, in some cases, this may include a requirement for not ruling out opportunities for future enhancements. There is a risk that proposals and understanding of costs could change over time and the evidence base could need further updates. If new figures are provided at a later date, it may be necessary to consider these as part of a future assessment. Given the long term and complex nature of the project this is to an extent unavoidable.

Appendices

- 4.54 There were 3 email responses with comments on the EAP Appendices and these are summarised below.

Summary of responses

Delivery Plan

- Clarification requested in relation to bus facilities as while HS2 will bring forward bus facilities associated with a HS2 only scheme, other Project Partners may bring forward alternative proposals.
- West Somers Town should be updated to clarify that HS2 will not be delivering Eversholt Street active frontages.
- Euston Station and Tracks: the development packages set out in this table should be amended; NR should also be a lead for net zero carbon development and open spaces; NR is also a funding source/delivery mechanism for Euston Square Gardens.
- Camden Cutting: there are development plots here whose enabling is not linked to the new railway or station and will need to be 'self- enabling'.
- Ampthill and Mornington Crescent Station: the MDP is not currently delivery lead for Ampthill residential development.
- Development Sites: the Royal Mail site on Eversholt Street is not shown on the map as a development site.
- Glossary: Knowledge Quarter should be clearly defined within the EAP Update and geographically represented.

Council response

- The development packages in the delivery plan for Euston Station and Tracks will be reviewed and updated. The Delivery Plans will be reviewed to ensure that the correct delivery leads are identified. On the specific point around Euston Square Gardens, it should be noted that HS2 Ltd.'s Environmental Minimum Requirements cover the re-provision of Euston Square Gardens. The Environmental Statement accompanying the HS2 Act outlined the re-instatement of Euston Square Gardens following their use as a construction compound.
- The Camden Local Plan defines the Knowledge Quarter as a one- mile radius from King's Cross, which includes all of the EAP area. Wording will be reviewed to see if there is an opportunity to make this clearer.

Supplementary Consultation

- 5.1 This consultation report now goes on to summarises the responses to the consultation held July to September 2024. It is important to note that the consultation was additional to the 2023 consultation and all responses to that will be considered alongside responses to this most recent consultation. There will be consultation on the proposed submission draft of the Euston Area Plan prior to submission for independent examination (currently expected in Spring 2026).

Methods of consultation

- 5.2 The Euston Team 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, 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.
- 5.3 The estimated reach of all communications was over 83,000.

Facebook

- 5.4 Through organic and paid content on Facebook, we were able to reach 20,200 Facebook users, 96% of whom were within a 3km radius of Euston station. 4% of users engaged with our content through comments, likes, reactions or clicking through to the consultation microsite. This engagement breaks down as follows:
- Link clicks: 714 (3.5% of users)
 - Likes/reactions: 56
 - Comments: 28
- 5.5 A 4% engagement rate is well above the average Facebook advert engagement rate of 0.9% and our consultation ads were the fourth best performing content on the Camden Council account during the consultation period (with Cost of Living and Camden in Bloom content reaching more residents).
- 5.6 Our content on Facebook was also made available to residents in Bengali, Spanish and Somali.

X (Twitter)

- 5.7 Over the course of the consultation period, we shared one to two posts per week promoting the consultation. We used the Camden official X account @camdencouncil which has 46,600 followers. On X, our EAP content received:
- 9,500 unique impressions (views)
 - 287 post engagements (clicks to links, retweets, comments and likes)

Nextdoor

- 5.8 On Nextdoor, we shared eight posts over the course of the consultation (one a week) to reflect the lower rate of content posted to the platform by official accounts.
- 5.9 Posts were targeted directly to residents in the neighbourhoods in Camden most

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affected by the regeneration of Euston and HS2, including Euston, Mornington Crescent, Camden Town, Somers Town and Adelaide Road, and reached 3,575 residents.

Print advertising

- 5.10 A newspaper advert was published in the Camden New Journal on Thursday 11th July 2024. The paper has a circulation of 39,800.

Press release

- 5.11 A press release was published on the Camden Council website and sent to local Journalists.

Camden Council e-newsletter

- 5.12 The EAP consultation was publicised in the Camden Council resident e-newsletter on 18th July and 30th August 2024.

Camden Business e-newsletter

- 5.13 The EAP consultation was publicised in the Camden Business monthly e-newsletter in July and August. The e-newsletter is sent to 10,000 businesses in the borough.

Internal comms

- 5.14 A news item about the launch of the consultation was published on Camden Council staff Essentials website and shared in the all-staff newsletter on 18th July 2024.

Social media posts shared with Members

- 5.15 The EAP social media content was included in the bi-weekly communications update to Members during the consultation period, encouraging Members to share and engage with content.

Email

- 5.16 Emails were sent out via GovDelivery channels notifying interested parties of the consultation period and public drop-in events. In addition we contacted a wide range of interested parties and individuals via email, comprising:
- contacts on the Council's planning policy database, which is comprised of individuals and organisations who have asked to be contacted about planning policy matters, including those who have previously responded to planning consultations, and consultation bodies in accordance with regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012,
 - Camden Councillors,
 - neighbouring planning authorities (Barnet, Brent, City of London, Haringey, Islington and Westminster)
 - prescribed bodies, in accordance with the 'duty to cooperate' (as set out below),
 - neighbourhood planning forums and proposed neighbourhood planning forums and their members,

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- landowners in the Euston area.

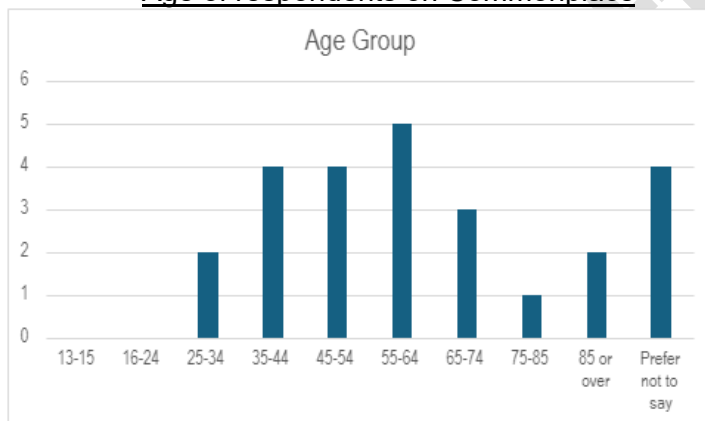
Posters

- 5.17 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.

Commonplace

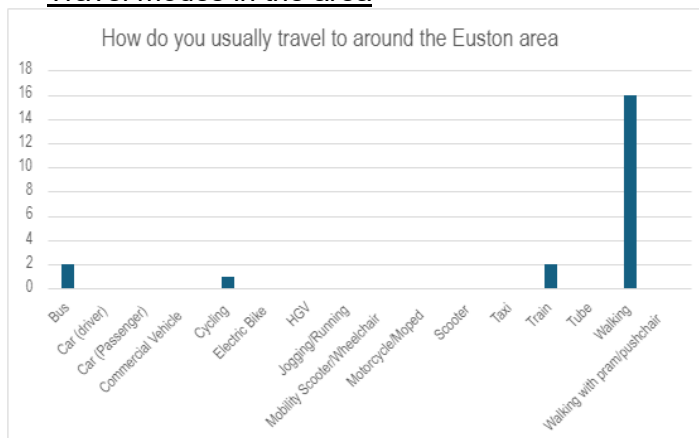
- 5.18 Commonplace is an online consultation platform used for the EAP consultation process. The homepage gave details of the consultation, links to the consultation booklet, summary of previous consultation in 2023 and asked a series of questions for the community to respond to about the additional consultation.
Link: <https://eustonareaplanreview.commonplace.is/> Commonplace was live from 8th July until 8th September 2024.
- 5.19 During the consultation period there were 2056 visitors to Commonplace with 26 comments received. 19 emailed responses were received in the Euston Area Plan team inbox.

Age of respondents on Commonplace



- 5.20 Most respondents on Commonplace were aged over 35 lived in the area (32%) and the majority walked to and around the Euston area (76%).

Travel modes in the area



Euston Area Plan Website

- 5.21 The relevant consultation documents including a consultation booklet, a summary response to the previous consultation in 2023 and a note on the EQIA and Sustainability Appraisal were made public on 8th July 2024. The consultation booklet detailed the purpose of the consultation along with potential site allocations and potential changes for the Euston Area Plan.

Public drop-in events

- 5.22 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. The 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, Starcross Street NW1 2HR

- 5.23 The Euston Team also held separate briefings for community groups and organisations where requested.

- 5.24 Nine people attended the online session and 10 attended the in-person session.

Duty to cooperate

- 5.25 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.

Summary of responses

- 5.26 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?

- 5.27 There were 20 direct responses on Commonplace on the first question and 11 additional comments regarding the **overall proposed approach set out in this consultation**. These are summarised below:

Summary of responses

- Camden refers to the limited information that is available to the Council in order to guide where expected changes are to affect the specific places. We seek further clarification on what is meant by limited information.
- Support the importance of Camden's EAP objectives and continued recognition on a comprehensive approach to development, including highlighting the importance of placemaking, improving connectivity and providing replacement and new open spaces.
- The EAP highlights mixed-uses with housing as the priority to reflect the Local Plan's overall land use priority, maximising the provision of housing units as permanent homes to meet local housing needs. This could be considered at odds with the overall land use strategy of the EAP, which recognises the reduced availability of land and site constraints, setting new, lower targets for housing delivery.
- The land use strategy does not adequately support the economic and social aspirations of the EAP in its renewed identification of new jobs as an integral element of the regeneration of Euston.
- Greater emphasis should be made of the fact 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 EAP Update should better explain this important factor and recognise the need for a level of development that will facilitate delivery of the transformational aspirations for Euston.
- Any homes / jobs / floorspace figures within the EAP Update should be presented as indicative (not maxima) and it is important that a future planning application is determined on its own merits, and on the basis of its own supporting documentation / evidence at the point of submission, as well as national, regional and local planning policy.
- The EAP focusses unduly on the delivery of HS2 and development proposals, and should take a broader, longer-term view that better considers the redevelopment of Network Rail's Euston station as an integral part of the overall regeneration of Euston.
- Planned reforms of leasehold should remove the issues associated with building above the station
- We are concerned that the priority of the EAP is no longer to meet the needs of local people, but rather to extract the maximum development profit for HS2
- Identifying housing estates around Euston for regeneration and densification on the site allocations map before any consultation with residents ignores the decade of disruption and construction that residents have already experienced and once again creates insecurity around peoples' homes.
- There is an urgent need for more affordable housing and any affordable housing needs to be delivered at the early stages of the development to ensure that the local community see the benefits which they were promised by the HS2 Act. Fewer and fewer families can afford to live in Camden with Council housing purchased under Right to Buy and is now used in the buy-to-let market. Family flats are now HMO's occupied by students or young professionals.
- There is no prospect of the vision or the objectives of the 2015 EAP being delivered.

- The EAP is now proposing a housing development to the west of Mornington Terrace and to the north of Mornington Street Bridge. The proposed details are extremely vague. This a small stretch of redundant railway track. It has been available for an appropriate development for the past 50 years. I suspect that it has not been developed because it has been recognised that a development sympathetic to the character of the existing Grade 2 listed terrace not be viable.
- Housing above the station is not welcome
- The site allocations break the Camden Mission for Estates and Neighbourhoods

Council response

- The 'further information' in the 2024 EAP Consultation booklet relates to statements from Central Government about Euston and aims to give an indication of how this might impact on future updates to the EAP. This is closely related to the nature of this specific consultation which was intended to give a 'direction of travel' update based on the information that was available at the time of publication.
- The Updates to the EAP will be informed by a number of factors, including policies in the London Plan, constraints associated with developing over transport infrastructure, viability and the opportunities afforded by its location. The Cuttings is categorised as "predominantly residential" - so apart from some limited commercial uses in appropriate locations, mainly residential uses are expected. .
- No information has been made available about funding requirements. Further discussions will be ongoing about likely phasing of future development.
- The Council will negotiate to seek the maximum reasonable amount of good quality, genuinely affordable housing and future planning applications for development will be assessed against all relevant planning policy at the time of decision and a decision will be taking in line with the Council's development Plan unless material conditions indicate otherwise. The design-led capacity study, which has informed the proposed updates to the plan, has, in line with guidance, sought to optimise development across the Plan area.
- The policies in the plan include a number of points in relation to feasibility and the overall land uses strive to achieve a balance between supporting the Knowledge quarter through direct uses and also through the delivery of much needed housing.
- It is recognised that housing is unaffordable to many in Camden and the Euston area. Housing and affordable housing are priorities for the Council. A key objective of the EAP is to provide homes to meet local needs and this objective will remain central to any future updates to the EAP.
- The Objectives and the Vision of the EAP are considered realistic and achievable within the Plan period up to 2051. Parts of the plan have already been delivered such as new homes and upgraded open spaces.
- . The amount of development over the tracks has been reduced since the adoption of the EAP in 2015. Engineering constraints and funding issues are expected to limit the extent of decking above Network Rail

tracks, and decking is no longer anticipated above the tracks in the northern part of the railway cutting or above the tracks on the eastern side. However, there may be an opportunity to develop on the sidings adjacent to Mornington Terrace. Camden remains committed to decking over the tracks and will work with partners to unlock this potential.

- The Council's Missions are the long-term goals for the future of our borough and the Mission for Estates and Neighbourhoods say that by 2030, Camden's estates and their neighbourhoods are healthy, sustainable and unlock creativity. Apart from specific development plots, estates will not be included as site allocations, but it is noted that further work will be carried out with residents to explore opportunities for delivering additional housing.

5.28 There were 16 direct comments to the second question on Commonplace on the suggested approach to the **Euston Station and tracks chapter** plus eight additional separate comments on the topic as summarised below:

Summary of responses

- There need to be six or seven platforms for HS2 services, delivered as soon as possible, even if some of the associated works are temporary, and then to design in scope for expansion later.
- There is the potential for redevelopment of the Royal Mail site to make a very significant contribution to the Borough and to its Knowledge Quarter objectives. There is ambition for the Site to come forward as a Knowledge Quarter scheme, and the need for a flexible and comprehensive approach to the Site in the Euston Area Plan that enables a feasible and deliverable development.
- It is important that there is a northern entrance to the station to allow for connections to Camden Town and Mornington Crescent
- The future EAP should seek to be more ambitious with regards to the number of new jobs within the wider station area and we would welcome further engagement on the indicative quanta and metrics for all new homes and new jobs. These should be stated as indicative estimates and are not to be interpreted as caps or maxima.
- We welcome the recognition within the 'Euston Station and Tracks' Site Allocation that there will need to be different options to cover different levels of ambition for development, based on different station scenarios, and for further work to demonstrate development capacity.
- Suggest that "multi-phased" is added to this Places chapter to references to "comprehensive approach" in Euston Station and Tracks and Cuttings chapters. "Comprehensive" requires further explanation.
- References to the number of platforms for HS2 should not be specified as the design has not been finalised.
- Documents refer to HS2 with very little or no reference to RECS/Conventional station
- The development plots over Network Rail tracks raise viability challenges
- The Royal Mail site is shown within the Euston Station and Tracks section. It should be noted that it sits outside RECS phase 1 boundary.

- The focus on improving pedestrian and cycle safety is positive; safer pedestrian and cycling routes will encourage sustainable transport choices and improve the quality of life for Euston residents and our service users.
- There should be housing provided as well as green space on Cobourg Street.
- The existing station needs to be improved now to improve accessibility and improve conditions for people waiting for trains.

Council response

- The Council are working with Partners to achieve a comprehensive and integrated approach to station that HS2 is delivered and with potential safeguarding for future expansion.
- The location of the Royal Mail site is recognised as being appropriate for a mixed use development (prioritising housing) in the Site Allocation document and a comprehensive approach with the station is strongly encouraged.
- The EAP Update recognises that new station entrances east, west, south and north should be incorporated into the stations (unless demonstrated to be unfeasible) to facilitate walking and cycling to nearby destinations and provide accessible access for all. Entrances at the north of the station would particularly help to encourage people to walk to Mornington Crescent and Camden Town
- Figures for jobs and homes in the EAP Update are based on design-led, capacity studies and a range of development is suggested. They are indicative figures rather than maxima ones.
- Phasing is mentioned throughout the EAP Update and it is recognised that development at Euston will be multi-phased.
- The Government confirmed in December 2024 that the new HS2 station at Euston will have six platforms.
- The EAP Update has a number of references to the existing Euston station or RECS and expects the HS2 and Network Rail stations to be designed as an integrated station.
- Open Space and housing are likely to be provided on Cobourg Street on the former Maria Fidelis Lower School site.
- The EAP Update recognises that it is key to the continued attractiveness and success of Euston it is open, accessible, and inclusive to all. Developments should be designed to promote access and inclusion and improved health and well-being, in line with policies in the Local Plan.

5.29 There were 16 direct comments on Commonplace to the question on the **suggested approach to the Euston Road chapter** plus seven separate comments by email on the topic as summarised below:

Summary of responses

- The Gordon Street entrance has been omitted from illustration. It is TLRN and the wording requires amending to state the ambition subject to further modelling.
- Bus stops and passenger waiting area under buildings are not supported due to isolation and safety/perception of safety issues and worsened passenger experience
- The policy should consider additional cycle parking in a suitable location on-street.

- To facilitate the RECS scheme, NR will potentially seek to apply for a stand-alone planning permission to de-construct No. 1 Eversholt St, which could include the Doric Arch pub. NR would welcome support of the EAP to achieve this, as the removal of the B1 & A4 uses without re-provision may not be supported by current planning policy.
- Would welcome the opportunity to work with Partners to develop a long term vision for Euston Road.
- More detail on the type of retail envisioned for the area including support for independent businesses to help preserve the unique character of the Euston area and promote diversity in the retail offer.
- We welcome the removal of the TfL tunnel between Euston and Euston Square underground from the HS2 project. Pedestrian access should be prioritised and consistent with the reinstatement of the Euston Square Gardens.
- Euston Road should be a welcoming, green place for pedestrians and cyclists, while still facilitating the longer-distance movement of goods through the area by motor vehicle
- Any extension of the NR station concourse to the south, over the open space of Euston Piazza needs to a) replace that open space elsewhere on site and b) be designed so there is a proper, safe station forecourt so that passengers do not spill over Euston Square Gardens. NR 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.
- Cycle lanes should be reintroduced on Euston Road especially if the proposed east-west routes across the station are not realised.
- At least one more junction to the east should be marked in yellow alongside the N-S routes that benefit the Regents Park Estate and the cutting further north.
- The direct connection between Drummond St and the station should be clearly signposted with celebratory signage that reflects the design approach of the new shop fronts of the Drummond Street Neighbourhood Vision (HS2 funded).

Council response

- The section about pedestrianisation and public realm improvements on the northern section of Gordon Street will be revised to reference the fact that this is on the TLRN and that these changes would be subject to transport modelling.
- The redevelopment of Euston Station provides an opportunity to review and upgrade the existing bus facilities at Euston. It provides an opportunity to establish a bus facility that balances meeting both operational needs and the needs of bus passengers, while also creating a high quality interchange that with improves the public realm, better facilities for pedestrians.
- TfL and the London Borough of Camden seek to strongly promote and enable an increase in cycling and will seek to provide cycling improvements, including on the strategic and TfL road network (Euston Road, Hampstead Road and Eversholt Street).
- The Camden Local Plan have specific policies to protect public houses. Any potential loss of the Doric Arch pub would require planning permission and be assessed at application stage.
- That Euston Square Gardens should not become the de facto station forecourt is noted. The EAP expects new public spaces to be provided in front of the station entrances to act as a buffer between

the station entrances and Euston Square Gardens. The EAP also recognises that public spaces around entrance and exit points should be designed with ample space to allow for movement of people as well as space for people to linger, wait and relax.

- Due to changes in government direction since the time of the consultation, it is uncertain whether the underground link will be delivered or not. Regardless of this, the EAP Update will continue to promote the improvement of pedestrian access above ground across Euston Road and the enhancement of Euston Square Gardens.
- Euston Healthy Streets (EHS) is a joint project between Transport for London (TfL) and the London Borough of Camden (LBC). Its purpose is to carry out a strategic review of the streets surrounding Euston Station (Eversholt Street, Hampstead Road and Euston Road), in order to enable these streets to respond to regeneration and changing travel demands, in a way that is sustainable and meets Healthy Streets objectives. The vision sets out the quality of aspirations and scope of change that is sought for the area over the next fifteen years and beyond and will act as a point of reference for designing and evaluating future interventions - ensuring that the same vision and priorities are met by LBC, TfL and other key stakeholders as we collectively work to transform the Euston area.
- The Landuse Strategy in the EAP Update recognises that new retail inside the station is likely to focus on serving the demands of commuter passengers but should also consider a more diverse shopping audience too. The retail above the station and on its outward facing boundaries should provide wider diversity, tailored to the needs of the local community as well visitors. In addition the Landuse Strategy seeks to protect and enhance the specialist character and role of Drummond Street as a centre for ethnic shops and restaurants.
- The EAP Update seeks to ensure that any new development above or around the stations should be designed to be well-integrated into the urban realm around it and provide publicly accessible new places for the new communities as well as existing wider communities to use.
- The Euston Road chapter of the EAP Update highlights that improvements to pedestrian crossings, junctions and cycle routes should can be delivered as part of a phased approach as the Euston development takes place.
- It is recognised that Drummond Street Neighbourhood centre is being affected by prolonged construction activity relating to the delivery of a new HS2 terminus at Euston. One of the Urban Design Principles of the EAP Update Design Strategy is to improve connectivity as well as improve wayfinding;

5.30 There were 28 direct comments on Commonplace to the question on the **proposed site allocations set out** plus seven separate comments on the topic as summarised below:

Summary of responses

- Housing development should contribute to new healthcare facilities.
- Site allocations should take a more flexible and comprehensive approach to land use.
- Further clarity should be presented exploring the deliverable options on sites and the evidence behind the allocation of sites for residential-led mixed use developments with re-provided commercial floorspace
- Employment uses should be identified around Euston station
- The Site Allocations need to recognise some parts of the Euston masterplan will be more certain and able to be realised for development earlier than others. As long as this is coordinated and not seen to preclude the wider vision, the future EAP should explain that this is acceptable.
- Given Camden's aspirations to see changes to the current bus station layout, consideration should be given as to if any of the site allocations which have been identified would provide a potential opportunity to accommodate some of the necessary supporting bus infrastructure, e.g. bus stands.
- Strongly object to the inclusion of text suggesting that the Euston Tower site may be suitable for the inclusion of housing as part of a mixed-use scheme. Opportunities for housing delivery within the Euston Area should be assessed on a site-by-site basis, rather than by applying a blanket approach to all site allocations.
- 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 plans overall appear positive, and we remain open to discussion regarding our (The Place) own future location which may free up our current site for housing use.
- Objection to the inclusion of the Regent's Park Estate in the site allocations. Residents' interests should be protected in the current state of profound uncertainty in the area. This uncertainty has intensified since the original allocation in EAP 2015.
- Objection to the inclusion of the Amptill Estate in the site allocations. Residents' interests should be protected in the current state of profound uncertainty in the area and do not what the Estate opened up. This uncertainty has intensified since the original allocation in EAP 2015. There is concern that any new traffic would conflict with the Royal Mail vehicles in Barnby Street.
- Some residents in Churchway Estate do not want renewal/intensification work on their estate. It should not be a site allocation without the backing of existing residents. There are concerns that this could mean a loss of the open space on the estate.
- A housing compact should be developed to ensure that those who have lived through decades of disruption are able to access decent homes in the place they want to live. This could include looking at rent increase penalties, working with residents to ensure they can choose where on their estate their new home could be, etc.

Council response

- The EAP Update gives further information on specific Site Allocations and potential uses. The allocated sites provide guidelines for planning decisions and contributions to health care facilities will be collected through CIL.

- The majority of employment uses will be focused within the Euston Station and tracks area. Employment-related uses now largely fall under the same Use Class, Class E (Commercial, Business, and Service), which includes offices, research and development.
- In considering the initial deliverability of the plan, there is evidence that indicates that whilst some development in the area is uncertain in terms of viability, there is scope to improve this through refinement of costs, masterplanning and over time due to changes in viability assumptions (with confirmation of costs and more certainty of stations design and associated works).
- Consideration has been given to whether the bus station could be located in other locations and this option would remove buses from the station site, allow more development and therefore minimise the impact of bus movements on the public realm immediately in front of the station, on pedestrian movement and on Euston Square Gardens open space. It would however put more pressure on the road network which limits the level of improvements that can be introduced for people walking and cycling and potentially introduces more safety issues for pedestrians crossing the road and cyclists travelling on the roads, due to increased conflict with buses pulling in and out of stops.
- Despite the Euston Tower being included in the Supplementary Consultation in 2024, it has now been removed from the Site Allocations due to Planning Permission being granted for redevelopment to provide commercial floorspace and its general unsuitability for residential uses.
- The development plots shown are those that have been identified with Euston Partners.
- It is recognised that there are concerns about Regents Park Estate, Churchway Estate and Amptill Estates being shown as site allocations. They will not be taken forward as site allocations beyond where there are specific development sites identified but it is noted that further work will be carried out with residents to explore opportunities for delivering additional housing.
- A Housing Compact/Charter is being developed with the a panel of Community members (through a deliberative process) to set out community priorities for housing delivery in the area, to ensure that going forward the community needs are understood and woven in to the outset of any developments.

5.31 There were 14 direct comments to the question on Commonplace **on the priorities for new routes (East to West connections and North to South)** plus nine separate comments on the topic as summarised below:

Summary of responses

Council response

- 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 the EAP Update.
- New cycle routes will connect to the borough-wide cycle network and link Euston Station and new developments in Euston with the surrounding area.

- The possibility of confusion between different types of routes without further qualification in the policy language used is acknowledged. LBC propose referring to pedestrian / cycle routes as 'active travel routes' if they cater to both modes and to 'pedestrian' or 'cycle' 'routes' if the route in question only caters to one in the updated EAP. Likewise, more specific language for other types of routes, such as bus routes can be adopted in the updated EAP.
- Upgrades to east-west cycling infrastructure on Euston Road is a policy objective that is already included in the Euston Area Plan and will be retained going forwards. An additional qualification to references to such upgrades will be made by adding 'ideally in the form of physically segregated cycle tracks and junction safety improvements'. The omission of cycling from some of the east-west route improvement locations is noted and cycling will be added back into the reference to east-west improvements in the Camden cutting area, the general point about east-west routes in the 'Enhanced rail station facilities' section. Officers will reconsider maps that show walking only routes across the station and may adapt some of these to be shown as both walking and cycling routes, where these would connect into a wider cycling network. However, as noted by the respondent organisation, it is not certain that these connections could be delivered without steps or lift, which ultimately would undermine their function as true cyclable routes.
- The EAP Update recognises that new station entrances east, west, south and north should be incorporated into the stations (unless demonstrated to be unfeasible) to facilitate walking and cycling to nearby destinations and provide accessible access for all. Entrances at the north of the station would particularly help to encourage people to walk to Mornington Crescent and Camden Town.
- The re-design of the Network Rail station does have the potential to increase pressure on footways surrounding the station, in addition to changes coming forwards from HS2 will be added to the EAP update.
- The EAP Update recognises that it is key to the continued attractiveness and success of Euston it is open, accessible, and inclusive to all. Developments should be designed to promote access and inclusion and improved health and well-being, in line with policies in the Local Plan.
- The concern with the continued impact on Drummond Street businesses from HS2 construction is noted as is the concern with extended disruption resulting from additional platforms being brought forward at a later stage. The EAP Update states Drummond Street would be designed as a priority area for pedestrians and cyclists. Any scheme would be brought forward in consultation with the local community.
- Concerns about loss of Churchway open space are noted. There are no plans to lose the green space. Any plans for new housing on Churchway would be discussed with residents at an early stage.
- The EAP Update highlights the need to improve links through and across the station. Creating 'new green streets above, through and around the station and railway tracks to make it easier for people to move between Somers Town and Regent's Park and from Euston

Road to Mornington Crescent, which is currently made difficult by the existing Euston Station building remains a key aim of the EAP. The EAP principles to secure enhanced north/ south routes and east/ west routes which reconnect communities and make it easier to move through and around Euston station will be retained and key routes prioritised for delivery.

- Improving east - west connectivity is an objective of the EAP - exact routes to be provided will be resolved through the planning application process.

5.32 There were seven direct comments to the question on Commonplace asking for **suggestions for additional sites or locations which could be suitable for conversion to housing not currently identified** plus nine separate comments on the topic as summarised below:

Summary of responses

- Highgate, Primrose Hill, Hampstead suggested for housing options without specific site locations
- Novotel should be converted to social housing
- Garage site on Three Field Estate
- 152 – 156 North Gower Street
- Regents Park Barracks

Council response

- The majority of the sites are outside the Euston Area Plan boundary. The Local Plan (for the rest of the Borough) has a variety of additional Site Allocations.
- 152-156 North Gower Street is within the EAP boundary and Officers are in discussions with the owners of this site to explore whether it could be included as a new site allocation.

Other comments made on EAP topics

5.33 Six comments were received about **building heights** in the EAP consultation. These are summarised below:

Summary of responses

- Support the update to the definition of a tall building
- The sensitivity of the surrounding area of Euston station in historic environment terms creates the obvious potential for adverse impacts on heritage significance through such decisions
- The Regents Place Campus including the Euston Tower should be included as an area potentially suitable for tall buildings.
- Heights should be reduced to benefit from the reduction in HS2 station size.
- There is a critical need to protect views, including those from Regent's Park, from disruption by tall buildings and clusters of tall buildings.
- The proposed height of the Barnby Street site is too high and will dominate St Mary's Church and the surrounding listed and locally listed buildings. There is the potential to improve the Barnby Street/Eversholt Street junction to enhance the church setting.

- Building residential accommodation in the Cutting area which had been zoned for replacement open space is inappropriate for the historic setting reflected by two conservation areas.
- Clarity needed about heights of building opposite Clarkson Row. Residents currently enjoy an uninterrupted view. Concerns about loss of light and overlooking.

Council response

- The height figures are intended to provide a potentially appropriate height range rather than providing maxima or capped 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.
- The desire that the reduction in plan form of the HS2 station should result in a reduction in indicative heights is noted. The indicative heights shown in the July Consultation booklet does not attempt to map where development can be delivered as there are currently no firm plans for station design. We expect future decisions in relation to these points may affect where and how development can take place, which would be reflected in future updates to the EAP. The indicative maximum heights shown in the July 2024 Consultation booklet remains unchanged from January 2023 consultation.
- The EAP recognises the sensitivity of this area and states that "development proposals should be sensitive to the historic context and seek to preserve and enhance the setting of heritage assets through sensitive design and scale
- The concern with the impact of the indicative potential height of the Royal Mail site (1 Barnby Street) on St Mary's Church is noted. The Design Strategy in the EAP is expressly concerned with development avoiding harm to the local context. It states that massing should be stepped back, have variation presenting breaks, avoid coalescence of massing in the townscape, and stitch the development within the context, especially where height needs to be mitigated to avoid harm to the immediate surrounding neighbourhood or to local views.
- Proposed building heights are set out in the EAP Update however exact building locations, layout and designs will need to be resolved through the planning application process where the amenity impact on nearby residential occupiers would be considered and an assessment on daylight and sunlight of existing nearby properties would be included.

5.34 Five comments were received about the **Knowledge Quarter** in the EAP consultation. These are summarised below:

Summary of responses

- Emphasise the importance of the Knowledge Quarter area, educational uses and the need to support the ever increasing demand for student housing
- There should be greater focus on creating and retaining floorspace for the knowledge economy growth sectors, ensuring genuine local benefits and opportunities for jobs and training are created.

- Further detail is needed on specific sectors within the knowledge economy that the plan aims to promote (tech, life sciences, education, culture?) and how universities/research and educational institutions could collaborate with businesses to realise a knowledge economy.
- The approach to affordable workspace should be flexible, particularly for lab enabled floorspace. 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.

Council response

- It is important to note that there is a need for permanent housing, however the Euston Area Plan is realistic in noting that there is now less land available for development given that less land will be enabled for development over and around the station. There needs to be a careful balance and we are seeking to deliver housing where it is possible and feasible, focussing on the most unconstrained areas.
- The reduction in enabled land and technical constraints of building over the Station has resulted in a reduction in the number of homes that are expected to be delivered. In addition, the lower range of employment floorspace that could be delivered has also been reduced due to less land enabled.
- The Landuse Strategy sets out that the Council will support and prioritise the creation and retention of suitable floorspace for Knowledge use Quarter priority growth sectors, in particular life sciences; cultural, scientific and heritage collections; and data sciences as well as educational floorspace. Other employment uses will be supported where it is shown that these reflect current and emerging needs of the knowledge economy.
- 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.

5.35 20 comments were received about the **Open space** strategy in the EAP consultation. These are summarised below:

Summary of responses

- Concerns that the Open space illustration is unclear and it suggests that open space is required in the centre of each development parcel and that specific levels of open space are required.
- Onerous requirements for open space will limit the amount of development that can be achieved and therefore the land receipts that will be generated to fund the necessary transport infrastructure. As such, the future EAP will need to consider creative opportunities, as highlighted within the Open Space Study, for the incorporation of new green infrastructure, and/or the solution put forward above.
- It would be good to see a focus on encouraging biodiversity within green spaces
- strongly endorse the keen feeling of loss of open space through the current project and urge the use of space available from the reduction in size of the HS2 station for open space as well as housing.
- Open space on top of buildings is not like-for-like replacement for the lost open space

- It is vital that new open spaces on the ground are provided early on in any development. There is a massive deprivation of open space in Somers Town.

Council response

- The open space illustration gives an indicative view of how the open space network should be created. It is not requiring that open space is provided in the centre of each development plot, rather indicating that each development plot should consider how it will meet its open space requirements (in line with local plan policy) and contribute to the wider network being created in Euston.
- The EAP Update does not place any additional requirements on the development. The Environmental Statement (ES) accompanying the HS2 Act (and subsequent updates) demonstrates what they think is appropriate mitigation for the open space lost to the HS2 scheme and this should be the minimum quantum of open space 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. 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. Replacement open space should be provided as close to the original location as possible.
- New development will generate its own open space requirement.
- The Council's biodiversity strategy 'Creating Space for Nature in Camden' sets out our ambitions for protecting and enhancing nature and biodiversity in the borough. The draft New Local Plan expects development to protect and enhance biodiversity in line with policies NE1 and NE2 and the Open Space and Green Infrastructure Strategic Principle in the EAP Update sets out that biodiversity and access to nature should be fully incorporated into the design, construction and operation stages of development at Euston.
- The EAP Update seeks that new buildings should be sited to maximise opportunities for public open space and be designed to ensure such space is truly inclusive and accessible to the public.
- The Council is seeking the appropriate amount and location of resident-oriented public open space to meet resident needs. St. James' Garden, permanently lost as a result of HS2 work, provided a generous green space for quiet and respite, with mature trees and was designated a local Site of Importance for Nature Conservation. It is expected that these qualities will be reprovided as part of the open space provision at Euston.
- It is recognised that there are Open Space deprived areas in the Euston Area. The EAP Update seeks to ensure that the implementation and delivery of Euston OSD is coordinated through close working with the landowners to ensure early release of relevant plots which may include open spaces.

5.36 There were two responses received with comments on the **evidence base**/ demand for facilities. These are summarised below:

Summary of responses

- Evidence base for the EAP has not been published.
- As the EAP seeks to provide additional residential accommodation there will be demand generated for sporting provision. New developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site.

Council response

- Landowners and their Representatives have been kept updated and in line with national policy guidance, have been given the opportunity to feed into the viability appraisal of the plan and conversations are ongoing to reflect the changing context. A full background report with evidence will be published at Regulation 19 stage alongside the revised EAP Update.
- Contribution to sports and recreational facilities is recognised. Camden will use s106 planning obligations to influence the nature of development in Euston as well as to mitigate and compensate for its potential effects. S106 legal agreements will be used to manage site specific impacts (through financial and non- financial obligations) and secure measures necessary to make a development acceptable in planning terms.

5.37 There were four responses with comments on **phasing and flexibility** in the EAP. These are summarised below:

Summary of responses

- The EAP update should be considering how a viable quantum and scale of development for the Euston masterplan can be embedded into the EAP Update now, at plan-making stage, so that the necessary scale of development for the Euston masterplan can be reflected in policy going forward. Sufficient flexibility needs to be building into any height parameters to allow development proposals the opportunity to justify the approach to building heights.
- The long-term phasing approach to redevelopment of Euston is a key consideration and the future Plan must recognise and support the need for development to occur in self-contained stages. The future EAP will need to recognise that limitations imposed by infrastructure constraints and phasing might have a significant influence on how overall site-wide principles are eventually realised.

Council response

- 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 line with London Plan policies, it is expected that viability, and therefore affordable housing delivery, will be reviewed at key milestones / as each phase of the stations masterplan is progressed given the long-term nature and phasing of the scheme over the railway/ stations.

- 5.38 There were seven responses received with comments on plans for **buses** in the EAP. These are summarised below:

Summary of responses

- The bus station is not included on illustrations or shown as incorrect. In addition, “bus facilities” has been used instead of “bus station”. This needs to be amended to highlight the aspiration to retain or replace the bus station. The document should make clear reference to the need for 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.
- The EAP should be clearer on the aspiration for the redevelopment of Euston to provide both new and improved bus station facilities, as well as providing for pedestrians, cyclists and public realm.
- Bus stops or stands on Euston Road have not been agreed and should be removed from illustrations.
- The current bus station is not an interim location as TfL currently have a lease on the site until 2077. The bus station needs to be retained in the southeast corner of the site for customer and operational reasons. Based on the work undertaken to date, at present, retaining the facility in its current location is considered the only feasible option.
- Given the aspirations of the EAP, consideration should be given to how the existing facility could be enhanced in the short-term to improve the public realm along with conditions for pedestrians and other users. Partners should work together to see if there is an alternative long-term solution, which better addresses the competing demands for the area and meets the principles for bus provision set out in the EAP.
- Unless a suitable alternative, safe, accessible and operable location is agreed for all partners, the bus station will remain in its current location
- We strongly endorse the draft EAP’s aim to reduce the impact of buses on Euston Square Gardens.
- Having buses entering and leaving Eversholt Street is going to add to the chaos in that area. TfL needs to minimise the number of buses that use the bus station and include bus stands on other key routes.
- The current working assumption for the location of the bus station does not align with that showed within the consultation documentation and the end state location is likely to change.

Council response

- The Summer EAP Update consultation 2024 noted TfL's operational preference for a bus station in the southeastern corner of the Euston Station campus. Some of the overview maps in the Summer 2024 EAP Update consultation did not include the bus station location as they were using high level base maps from the EAP that do not include this. Some of the maps in the published draft Euston Area Plan do show the future bus station in the southeastern corner of the site, as per TfL's preferences. As there is currently uncertainty around the exact location of the bus station within the station campus LBC considers it is not possible to indicate a more precise location

and that the area indicated is sufficiently high level to not be misleading.

- The full policy text on buses outlines key criteria for both delivering a new bus station and enhancing pedestrian and cycle infrastructure and the public realm. The word balance has been used to acknowledge that some trade offs will likely be required between these criteria. Going forwards, the word both will be used to introduce bus station aspirations, with a separate point added at the end of the bus section to highlight potential balancing requirements.
- It is expected that the new bus station would have a linear format and that it would be located off highway at the front of the station along the northern edge of Euston Square Gardens. Camden's aspiration is for this facility to be one-way but the exact layout will be determined in future design stages.
- The Transport Strategic Principle seeks for improvements to bus facilities that meet TfL's operational and passenger requirements, the need to accommodate increased bus passenger numbers and to provide resilience for the future bus network, while improving the environment for pedestrians and cyclists and enhancing public realm by Euston Square Gardens.-
- The Summer 2024 EAP Update consultation materials indicatively showed the bus station located in the southeastern corner of the station campus. The annotations noted that this location was still being tested and uncertain at the time of the consultation.

5.39 There were seven responses received with comments about **taxi provision** in the EAP. These are summarised below:

Summary of responses

- When considering potential taxi locations, it should be ensured they don't conflict with the aspiration to promote journeys to/ from the station by more sustainable modes including walking, cycling and public transport.
- Further consideration needs to be given to how private hire vehicles in the area can be best managed to avoid conflicting with the sustainable transport aspirations of the strategy.
- The requirement for taxis and PHVs should be set in agreement with relevant members of The Euston Partnership.

Council response

- The Summer 2024 EAP Update consultation text acknowledged the importance of designing and orienting taxi facilities so as to be accessible for those who need to use this mode but that it encouraging use of taxis over more sustainable modes should be avoided. The EAP Update would also include sections on better managing private hire vehicles in the area and reducing their impact on neighbouring streets, particularly in sensitive and residential areas. The EAP Update would include reference to the need to develop a management strategy for both private hire vehicles and taxis, which would need to be owned and delivered by Euston Partners.

- Developing strategies for managing taxis and private hire vehicles and their supporting facilities would be implemented and managed by Euston Partners, to ensure taxis and private hire vehicles are not being over provided for, are not or over-ranking on the public highway, (applies to taxis only, as PHVs are not permitted to rank) or picking up and dropping off on streets around the station in ways that result in congestion or road safety hazards.

5.40 There were eight responses with comments about the **Transport Strategy** in the EAP. These are summarised below:

Summary of responses

- We are pleased to see adapted and cargo bikes mentioned and are supportive of Camden's strategy to allow for further expansion of HS2 station at a later date
- Support the general principles outlined in the Transport Strategy including the prioritisation of active travel and public transport over private vehicles, PHVs and taxis and the importance of high quality links to Camden's cycle networks
- The EAP Update should promote what is considered to be a credible, evidenced and preferred way forward in this respect and retains flexibility which comprehensively addresses the future transport interchange and how this will interface with the site surroundings.
- Reference could be made to safeguarding/ enabling options which would help improve permeability through the site, so that new N-S and E-W pedestrian links can potentially be delivered in the future, even if they are not feasible from day one.
- While information on expected future demand resulting from the Network North paper is not yet confirmed, which could affect the future train services into Euston, which will in turn impact the number of additional trips people will make to and from the area post redevelopment. The general approach taken in the Transport Strategy to date should allow for this potential change, as the current range of scenarios considered include varying levels of development. It is not expected that a scale of development would come forward that could see trips and vehicle movement numbers exceed what has been modelled to date. Further transport modelling may be needed in the future if any fundamental changes occurred to the station design which would impact on the demand for onward transport services, however this is not currently anticipated.
- There will likely be a need to alleviate pressure on the footways on the surrounding roads, such as Euston Road, Eversholt Street and Hampstead Road resulting from proposed changes to the HS2 station design, notably the potential removal of the Euston Square station underground link and the change in approach to OSD, which means it will no longer be feasible to deliver new n/s- e/w links over the station. Emphasis should therefore be put on the importance of delivering the Euston Healthy Streets schemes and the Euston Partners role in supporting their delivery.
- There will be no east / west routes through the station, only north / south around the station as per current HS2 / Network Rail designs. All current development is proposed on the Coburg Street side of Euston Station and shouldn't have any impact on Eversholt Street. There will however be a bigger impact on Drummond Street and the surrounding roads. The currently unfunded Network Rail New Euston scheme could have an impact on Eversholt Street / Euston Road.

- Would like to see references in the document encouraging walking and cycling connections to the Regent's Canal, as well as better wayfinding to signpost towards the canal.

Council response

- The EAP will address solutions for all transport modes and will acknowledge overlaps between modes. The measures and design objectives set out in the updated EAP will be based on the latest update to the EAP Transport Study, which is jointly prepared by LBC and TFL and provides the evidence base for EAP policies. The EAP will clearly set out the need to balance operational requirements for key modes such as buses and taxis with aspirations to enhance walking and cycling. These policies will be written flexibly, so that they can be applied to changing circumstances in the future.
- In the updated EAP, LBC will include reference to safeguarding of potential north-south and east-west routes through the campus, even if these cannot be delivered upfront. This will be in addition to policy that prioritises amongst the different route options across the station and policy around the importance of improving alternative routes around the station if routes across the station cannot be delivered.
- The Council has, in collaboration with TFL colleagues, updated the Euston Area Plan's supporting Transport Study, which tests the impact of increased demand under different development scenarios at Euston. The robustness of the existing modelling and analysis in the study under the expected changes to the extent of HS2 will be examined, including the need for any further modelling work. It is expected that the assumptions of a higher demand scenario used in the original study will mean it is sufficiently robust for its outputs to continue to be used even under a scaled back HS2 scenario.
- The Summer 2024 EAP Update consultation acknowledged that a reduction in the number of east-west over-station routes that can be delivered would result in increased pressure on the footways of surrounding streets. In the EAP update, Camden will add further emphasis on the importance of progressing pedestrian improvements on these streets and the role of Euston Partners in delivering and supporting these changes.
- Given the continuing uncertainty around the exact nature of future station designs and the feasibility of delivering east-west links (including further changes since the summer consultation) the EAP update will be worded flexibly with regards to which streets around Euston might need further infrastructure investment, if east-west / north-south routes through the station prove unfeasible. This wording will include a reference to review which streets would be worst affected once the station configuration becomes clearer.
- The maps indicating future enhanced walking and cycling routes included in the EAP policy document are of a high level nature and there are numerous locations and routes suitable for active travel that these routes could guide people towards. In the updated EAP Officers will consider adding a label for Regent's Canal onto the map and will make reference to Regent's Canal and other key walking and cycling routes in sections that refer to wayfinding in the policy text.

- 5.41 There were five responses received about the Environment Strategy in the EAP. These are summarised below:

Summary of responses

- The emphasis on community consultation, connectivity, sustainability, and green spaces is appropriate. All new developments in the area should be done on a net zero basis when under construction and once occupied with all housing energy efficient (close to passiv house standard) using economical and simple-to-maintain systems so as to make them affordable to live in as well as to purchase.
- Every possible opportunity to introduce new trees, planters, green walls, etc. should be taken, including on existing network rail infrastructure, provided this is done in a way that maintains safe streets and designs out anti-social behaviour. Ideally this would be done in collaboration with existing residents, especially given the mismatch between number of allotments and demand for growing space in the area.
- Existing buildings should be retrofitted rather than demolished

Council response

- The Environment Strategy in the EAP Update requires that all developments at Euston include sustainably designed zero emission fossil fuel free new buildings, on site renewable energy and a substantial number of new trees.
- The retrofit of existing buildings is strongly supported by the Council. Developers must demonstrate that they have thoroughly explored options for retaining and retrofitting existing buildings