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1. INTRODUCTION

- 1.1 The London Borough of Camden has prepared a Sustainability Appraisal (SA) of the Euston Area Plan (EAP) Update Proposed Submission Draft. Once the EAP is adopted, it will set out the strategy to help shape the future of the Euston area, allocate sites to deliver the strategy and establish policies against which policies will be determined. The EAP will sit as part of the Camden Local Plan documents.

- 1.2 This report relates to the Regulation 19 Euston Area Plan Update Proposed Submission Draft and should be read in conjunction with that document. An interim SA Report was prepared for consultation in 2021, alongside the Regulation 18 Euston Area Plan Update.

Background to the area

- 1.3 The London Borough Camden is situated in Central London and is bordered by the following other London Boroughs of City of London, Westminster, Islington, Haringey, Barnet and Brent. The Borough of Camden covers almost 22 square kilometres, comprising 1.4% of the Greater London area, making it one of the smallest boroughs in London. Despite this, Camden has the 9th highest population density in London and is home to some 218,000 people, according to the ONS mid-year estimates in 2022. Camden's population is also ethnically diverse, with the 2021 Census showing that 40.5% of Camden's residents were from Black, Asian or other ethnic communities. Furthermore, the 2021 Census reports that 15.2% of residents in Camden have a disability or long-term condition that limits their day-to-day activities. This is the second highest proportion amongst London boroughs and is higher than the London average (13.2%).

- 1.4 The EAP boundary covers approximately 85 hectares and includes Euston Station, Somers Town to the east, Regent's Park Estate to the west, Mornington Crescent to the north and south to northernmost Bloomsbury. Within the Euston area there is a younger population than the rest of Camden and London, which is driven by almost a quarter of the population (24.3%) aged between 15 and 24 which is almost the double the percentage for Greater London and significantly above the proportion of this age group in Camden. The Euston area has a high student population with 20.4% of all usual residents aged 16 and over recorded as students in the 2021 Census. This compares to 12.4% of 16+ residents being students in the wider borough and 7.2% in London. The high student population may be a factor in the high proportion of those in the Euston area aged between 15 and 24. This significant student population may relate to the concentration of further education institutions to the south of the Euston Road.

- 1.5 The area is characterised by a mix of historic and modern buildings of significant scale and at high densities. Large parts of the South of the borough are also covered by conservation areas, with historic London squares and high numbers of listed buildings. The area is also well served by open space, the largest of which is Regent's Park, which straddles both Camden and Westminster. The Euston area and South of Camden is highly accessible and has excellent public transport links, with underground stations, multiple bus routes and major railway stations, connecting Camden with the rest of the UK and mainland Europe.

- 1.6 The Euston area forms a part of London's Central Activities Zone (CAZ), a major

business and employment centre, which contains a significant proportion of the borough's office floorspace, in addition to providing a diverse retail and leisure offer. This area is also home to the 'Knowledge Quarter' (KQ), an internationally significant innovation district, harnessing collaboration between private sector companies, universities, hospitals and research establishments in fields such as medical and life sciences, data analytics and machine learning, which is centred around King's Cross and Euston.

Central Government

- 1.7 The government's 10 Year Infrastructure Strategy outlines plans to establish a Euston Delivery Company to lead private investment and development at Euston Station, working with Camden Council and the GLA to grow a commercial and life sciences hub, deliver affordable housing, and support regeneration. The Strategy also highlights the potential for the Delivery Company to bolster the Euston Housing Delivery Group which was established by the Ministry of Housing, Communities and Local Government (MHCLG) to work in partnership with the London Borough of Camden and advise ministers and local leaders on "an ambitious housing and regeneration initiative for Euston" which looks at realistic options to deliver more homes in the wider Euston area and deliver 'exemplary placemaking'. The area is therefore a focal point for government activity to both deliver HS2/ station infrastructure and deliver commercial, life sciences and affordable homes which sets the context for the review of the Plan.

The Euston Area Plan

- 1.8 The EAP was jointly developed by Camden Council, the Greater London Authority (GLA) and Transport for London (TfL). Camden Council adopted the EAP in January 2015 as part of the Local Plan. The Mayor of London adopted the EAP as supplementary planning guidance to the London Plan in January 2015.
- 1.9 Since the adoption of the EAP in 2015, the context has changed, the High Speed Rail (London – West Midlands) Act 2017 ("the HS2 Act") has authorised construction of the first phase of HS2, however despite construction commencing, in 2023 the Government paused this to allow a review of station designs due to escalating costs and have announced the intention to secure private finance to deliver HS2 at Euston. The wider context and Council priorities have also evolved, including the development of We Make Camden, the Council's joint vision for the Borough, developed in partnership with the community, Camden's Climate Action Plan following the declaration of a Climate emergency and the Euston Social Value Charter. The Council has also consulted on an updated Local Plan (Camden Local Plan Proposed Submission Draft) in Summer 2025.
- 1.10 The National Planning Policy Framework (NPPF), requires that policies in local plans and spatial development strategies are reviewed at least every five years and updated as needed. Given the changes since 2015, a decision to progress with an update to the EAP was agreed by the Cabinet Member for Investing in Communities and an Inclusive Economy in February 2020.
- 1.11 The EAP is being updated to ensure that the evidence base for key parts of the plan are revised to reflect the most up to date information, constraints,

opportunities and priorities, including ensuring that the EAP is consistent with the updated Local Plan and the latest Government position on the construction of HS2 at Euston.

- 1.12 Proposals for development at Euston will be assessed against Camden's existing Development Plan, which is comprised of a series of documents that include the London Plan, the Camden Local Plan, and the Euston Area Plan (EAP) adopted in 2015.
- 1.13 As part of the Development Plan, the updated EAP will be a key document in implementing the objectives of the Camden Local Plan Proposed Submission Draft and the Council's vision for the future of Camden in We Make Camden. This is particularly in terms of helping to meet the borough's housing targets and making sure development of key sites meets the Council's aspirations in terms of land uses, design and infrastructure provision, securing the benefits of growth for Camden and its residents.
- 1.14 The EAP Update Proposed Submission Draft has been prepared taking into consideration the comments made during the consultation and engagement on the proposed updates to the EAP, the evidence studies commissioned to support the Plan, national planning policy, the London Plan, and We Make Camden and other relevant Council plans and strategies.
- 1.15 As much of the development capacity is on land created by the redevelopment of the stations and tracks, we have also worked with delivery organisations and transport bodies to understand that latest proposals for Euston. Work is ongoing to improve integration at Euston between the construction of the HS2 central London terminus and improved onward connections, Network Rail's redevelopment of the mainline station; the redevelopment of the London Underground station and the wider development of the urban environment managed by the Master Development Partner, Lendlease.
- 1.16 At the time of writing, there are no confirmed Euston station designs. There is a commitment to joint working by the delivery organisations to try to achieve the best solution for Euston. While this approach is welcomed, it does mean that there is less certainty around station designs, costs and timescales which means that updates to the Plan must provide enough flexibility for future design development.
- 1.17 The evolving information and the need to reflect evolving priorities including in relation to climate change and delivering social value, are all reflected in the proposed updates to the EAP. Also proposed updates to the EAP highlight more explicitly the need to ensure that new development contributes to reducing inequalities and increasing life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed, maximising social value and addressing concerns around safety and security.

- 1.18 An updated Euston Area Plan provides the potential to respond to latest constraints information and latest information on what space is able to be built on above and adjacent to the tracks and stations and guide where additional homes and employment uses could be delivered across the Euston area. The update to the EAP allows policy changes to reflect the changes in situation on the site since previous adoption.
- 1.19 The update to the Euston Area Plan (EAP) is intended to reflect changing circumstances at Euston and to ensure that policies and evidence are robust, reflecting up to date information, constraints and opportunities. Ensuring that the Plan and its evidence base is up to date will be crucial in helping to deliver the 'We Make Camden ambitions' (the Council's joint vision for the borough, developed in partnership with our community).
- 1.20 The EAP and the proposed updates include a number of strategic and cross-cutting policies which seek to create the conditions to deliver on a number of our We Make Camden ambitions, including contributing to a strong, sustainable, and inclusive local economy; creating safe, strong and open communities where everyone can contribute; good health, wellbeing and connection for everyone so that they can start well, live well, and age well; Everyone in Camden should have a place they call home and green, clean, vibrant, accessible, and sustainable place with everyone empowered to contribute to tackling the climate emergency. Some of the key challenges and issues to be addressed through the Euston Area Plan Update are listed below.
- Meeting the need for housing in the Euston Area
 - Responding to the climate and ecological emergency;
 - Adapting to demographic change and supporting families to remain in the Euston area;
 - Creating a sustainable and inclusive economy and supporting the Central Activities Zone and Knowledge Quarter;
 - Tackling inequalities to ensure that everyone has the chance to succeed and no one gets left behind;
 - Promoting health and well-being and addressing health inequalities;
 - Ensuring that travel becomes healthier, safer, more inclusive, more affordable and more sustainable;
 - Making the Euston area a safer place for all Camden's communities; and
 - Ensuring that new buildings and public spaces are designed to be safe, accessible, and inclusive, while respecting local context and responding to the distinctiveness of Camden's valued and special places.

2. SUSTAINABILITY APPRAISAL PROCESS

- 2.1 The Sustainability Appraisal (SA) is a mechanism or systematic process for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues (including 'equalities' and 'health' issues), with a view to avoiding and mitigating adverse effects and maximising the positives. The role of the SA is to promote sustainable development by assessing the extent to which the emerging Euston Area Plan Update, when considered against

reasonable alternatives will help to achieve the relevant environmental, economic and social objectives.

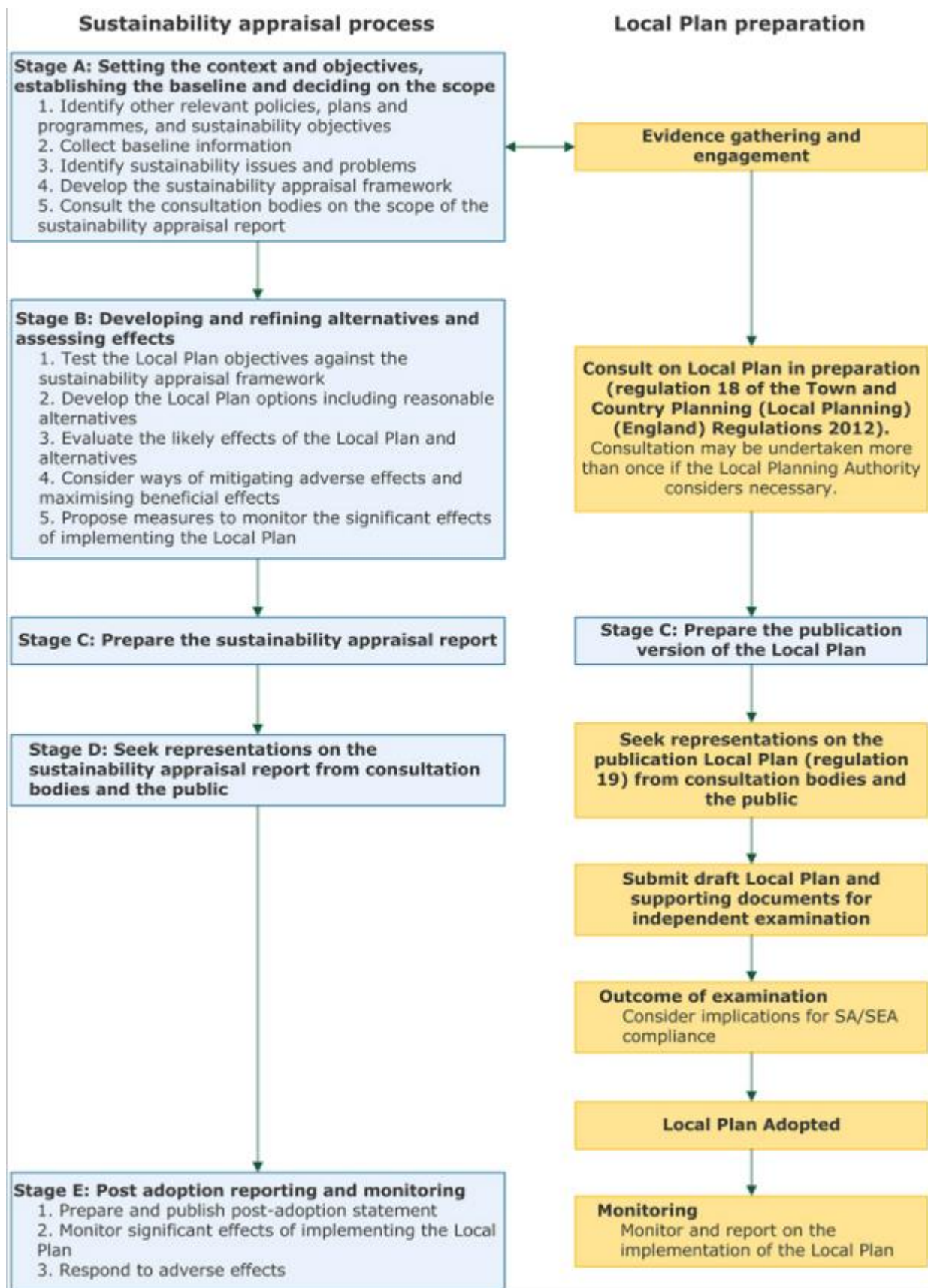
- 2.2 This is the SA of the Euston Area Plan Update Proposed Submission Draft (Regulation 19). The purpose of this report is to:
- Set out the work that has taken place to date as part of the SA and plan making process;
 - Identify and appraise a range of growth and spatial options;
 - Appraise the Council's reasonable site options against the SA Framework, identifying each option's likely significant effects;
 - Set out and appraise the Euston Area Plan Proposed Submission Draft, as well as the additional reasonable alternatives not considered in the Interim SA;
 - Consider the cumulative effects of the policies in the Euston Area Plan Proposed Submission Draft and identify how any negative effects associated with the implementation of individual policies can be mitigated by other policies in the Plan; and
 - Recommend monitoring indicators to monitor the social, environmental and economic effects of implementing the Euston Area Plan.
- 2.3 It is a requirement that an SA is undertaken in-line with the procedures prescribed by Section 19 of the Planning and Compulsory Purchase Act 2004 that a report (known as the SA Report) must be published for consultation alongside the draft plan. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.
- 2.4 In addition, the Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive, transposed in the UK by the SEA Regulations and amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232). The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA). The purpose of SEA, as defined in Article 1 of the SEA Directive, is: "to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development."
- 2.5 The SEA and SA are separate processes but have similar aims and objectives. In essence, the SEA focuses on the likely environmental effects of a plan whilst the SA includes a wider range of considerations, extending to social and economic impacts. The Government's Planning Practice Guidance shows how it is possible to satisfy both requirements by undertaking a joint SA and SEA process, and to present an SA Report that incorporates the requirements of the SEA Regulations. The SA and SEA of the Euston Area Plan Update is being undertaken using this integrated approach and throughout this report the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of SEA'. Appendix C sets out how the relevant chapters in this report meet the SEA Regulations

requirements, to show how the requirements of the SEA Regulations have been met through the SA process.

- 2.6 The report must then be taken into account, alongside consultation responses, when finalising the plan. More specifically, the SA Report must answer the following three questions:
- i) What has Plan-making / SA involved up to this point? – Including with regards to consideration of 'reasonable alternatives'.
 - ii) What are the SA findings at this stage? – I.e. in relation to the draft plan.
 - iii) What happens next? – What steps will be taken to finalise the plan? – What measures are proposed to monitor plan implementation?
- 2.7 This report builds on the Interim SA of the Euston Area Plan that was published in 2023 and the SA Scoping Report that was prepared in 2021. It also takes into account the findings of the SAs that were undertaken of the Camden Local Plan Proposed Submission Draft, Draft Site Allocations Local Plan 2020, the Camden Local Plan 2017, the Site Allocations Plan 2013 and Euston Area Plan 2015 which remain relevant.
- 2.8 The Sustainability Assessment of the adopted EAP, 2015, suggested that overall, its policies help to address the sustainability objectives outlined. While updates to the EAP better reflect and respond to evolving priorities and the changing context, broadly speaking the overall objectives, strategies and approach remain the same and as such the Sustainability Assessment is still relevant. The complex nature of the major infrastructure development at Euston means that designs and proposals are constantly evolving. Ensuring that the plan and its evidence base is up to date will be crucial in helping to deliver the objectives in the EAP and SA sustainability objectives, the We Make Camden vision and assessing the planning application for adjacent and Oversite Development.
- 2.8 The SA is carried out in parallel with the policy development process and is an iterative process that is intended to provide constructive criticism of policy options to ensure that negative impacts on sustainability are minimised and benefits maximised.

3. METHODOLOGY

- 3.1 National Planning Policy Guidance sets out how SA/SEA should be undertaken as part of the plan-making process. The SA of the Euston Area Plan has been carried out in accordance with this. The key stages of SA process are set out below.



3.2 The Scoping report published in September 2021 was the first stage of the sustainability appraisal process which involved setting the context, identifying the baseline and producing sustainability objectives, namely setting the scope for the

appraisal process. The report included a review of relevant policies, plans and programmes that relate to the Euston area; information on the baseline characteristics of the local area; consideration of the sustainability issues / problems and developed a framework for the future stages of the sustainability appraisal process, including the identification of sustainability objectives. Consultation was carried out with the following statutory bodies:

- Environment Agency
- Natural England
- Historic England

- 3.3 Consultation on the Scoping Report began on 30th September 2021 and comments were requested within 5 weeks. Responses to these were received from each body and the scoping report amended to reflect the comments made. These can be found in Appendix A. The Environment Agency suggested that land contamination was added to an SA objective 9 and Historic England suggested additional wording on the London View Management Framework (LVMF). Natural England did not have any specific comments on the Scoping report. The objectives have been revised to reflect the comments made.
- 3.4 The draft Sustainability appraisal (SA) was completed on the proposed updates to the EAP, published with the EAP Update Regulation 18 consultation in January 2023. The Assessment can be viewed [here](#). The SA published in 2023 found that the proposed updates to the EAP will deliver broadly positive sustainability effects and that the proposed area-based principles will mostly deliver positive benefits in sustainability terms against the relevant sustainability objectives. The Council carried out a supplementary consultation related to the Euston Area Plan, providing a 'direction of travel' update in September 2024 in response to the changes and uncertainty following the Government's recent announcements regarding HS2. The consultation was an additional exercise to the January 2023 consultation. A Sustainability Appraisal Note was published in June 2024 which outlined that the SA was reviewed in light of the supplementary consultation and Government announcements. The review judged that the options assessed in the 2023 SA appropriately reflected scenarios considered and therefore was not altered at that stage.
- 3.5 The Sustainability Appraisal has now been revised and will be published as part of the Regulation 19 consultation for the EAP Update in December 2025.
- 3.6 The Office for National Statistics released phased results from the 2021 census from September 2022 onwards. These includes data on ethnicity, religion, the labour market, education and housing. The Sustainability Appraisal has utilised this data to complete this appraisal.
- 3.7 The EAP Update is not prepared in isolation and is influenced by other policies, plans and programmes at an international, national and strategic level. Given this, there is a requirement for SA to take into account the relationship between the Euston Area Plan and other relevant policies, plans, programmes and sustainability objectives and in particular the Local Plan Regulation 19 Submission Draft. A review was undertaken within the Regulation 18 Submission Draft Sustainability Appraisal 2023 of other policies, plans, and programmes at the international, national, regional and local levels that were considered relevant to the scope of the Euston Area Plan. The list has been reviewed due to various policy and guidance

changes since then has been updated in 2025 in Section 6 below.

- 3.8 The London Borough of Camden has also prepared a Sustainability Appraisal (SA) for the Camden Local Plan Proposed Submission Draft. This SA for the Euston Area Plan Update seeks to provide further detail and information on the Euston specific environmental, social and economic impacts. In addition the London Plan review was also required to undertake an Integrated Impact Assessment (IIA) which included a Sustainability Appraisal and Strategic Environmental Assessment.
- 3.9 The Euston Area Plan SA Scoping Report provides a review of other relevant plans, programmes and sustainability objectives, a set of baseline characteristics of the area, and a number of key sustainability issues that the Euston Area Plan will need to address. This is used to provide an updated set of sustainability objectives and criteria (the sustainability appraisal framework) for use in the sustainability appraisal of the Euston Area Plan. These are set out in Section 6 of this report.
- 3.10 Developing options for the Euston Area Plan is an iterative process, usually involving consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. In relation to this SA Report, Regulation 12 (2) of the SEA Regulations requires that: "The report must identify, describe and evaluate the likely significant effects on the environment of - (a) implementing the plan or programme; and (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme." The SEA Regulations require that the alternative policies and site allocations considered for inclusion in a plan that must be subject to SA are 'reasonable', therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the NPPF) or site allocation options that are unsuitable, unavailable or undeliverable.
- 3.11 The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as consultation responses, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.
- 3.12 A matrix was developed that included the sustainability objectives and columns for carrying out the appraisal of the various EAP Strategic Objectives and policies. Within the matrix, the effects are depicted by symbols (see table.1 below), and a commentary is provided to state the reasoning behind the appraisal and to identify any relevant mitigation measures that may be available. This matrix is consistent with the approach used in the SA of the EAP 2015.

Table 1 Attributing effects to each objective	
++	Likely large positive impact
+	Likely positive impact
+-	Likely positive and negative impacts
0	Uncertain impact or no relationship
-	Likely negative impact
--	Likely large negative impact

- 3.13 A detailed assessment of how the Euston Area Plan Update meets the Sustainability Objectives is found in section 7 below.
- 3.14 This SA report documents the process that has been undertaken in carrying out the SA of the Euston Area Plan Update. It sets out the findings of the appraisal of options, highlighting any likely significant positive and negative effects.

Difficulties Encountered

- 3.15 The SEA Regulations, Schedule 2(8) require the Environmental Report to include: "...a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information." The SA process for the EAP Update have encountered the following difficulties to date which include:
- Due to the sheer number of strategies, plans, programmes, policy documents, advice and guidance produced by a range of statutory and non-statutory bodies, it has not been possible within the resources available to consider every potentially relevant document in detail. However, we have drawn out the key messages relevant to the preparation of the Euston Area Plan and the SA.
 - The baseline evidence gathered as part of the preparation of the SA Scoping Report represents a snapshot in time from 2021. Every effort has been made to ensure that this reflects the latest position at publication.
 - Every effort has been made to predict effects accurately; however, this is inherently challenging. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future).
 - In March 2023, the Government announced a pause to HS2 at Euston due to inflationary pressures and the need to find a more affordable design. Following a period of uncertainty, work on the EAP was paused. In October 2024 it was confirmed that HS2 would come to Euston, and work was restarted on the EAP Update.

4. Overall outcome of the Sustainability Appraisal

- 4.1 The SA for the EAP Update builds on the SAs which were produced for the adopted EAP and the Camden Local Plan Regulation 19 Submission Draft, which noted that the options for delivering new development in the Borough are inherently

limited given the limited availability of developable land; the densely developed nature of the borough; heritage, open space and other designations; and the need to balance competing land use priorities.

- 4.2 The SA for the Update to the EAP seeks to provide further detail on Euston specific issues. Issues of limited availability of developable land, open space, heritage and other policy requirements are consistent with those found in the Borough as a whole. The SA has found that the draft update to the EAP 2025 will deliver broadly positive sustainability effects and that the proposed area-based principles will mostly deliver positive benefits in sustainability terms against the relevant sustainability objectives. However, there are some issues and constraints which lead to trade-offs within the EAP, as discussed below.

Testing the EAP objectives against the SA Framework

- 4.3 Overall, this process indicates that the strategic objectives are generally successful in seeking to achieve sustainable development, providing positive impacts against social, environmental and economic objectives. Positive impacts include the role of the proposed EAP objectives in mitigating the impacts of HS2, providing new uses and meanwhile uses and development that meet sustainability goals and measures to improve accessibility and the local environment.
- 4.4 Several minor changes to the previous objectives were suggested through the SA process in order to expand their coverage, and these have been incorporated into the Euston Area Plan. The objectives are now therefore considered to address all the main elements of sustainability and contribute positively towards achieving this.

Assessment of strategic options

- 4.5 With regards to the consideration of reasonable alternatives, it is important to note that Euston Area Plan Update 2025 seeks to update the Euston Area Plan 2015. Although many of the policies in the current Euston Area Plan are still relevant, it was considered beneficial to update the Plan to ensure that future development in the Euston Area most effectively meets Council priorities and secures benefits for the borough and its residents, responding to changed circumstances, in particular:
- the publication of We Make Camden, the Council's Corporate Strategy;
 - the Council's declaration of a climate and ecological emergency;
 - changes to national planning policy, including the revised permitted development rights and changes to use classes;
 - the London Plan 2021;
 - changes to station design
 - economic and social changes (such as changes in working patterns and shopping habits).
- 4.6 As stated in paragraph 3.10, developing options for a plan is an continual process. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan. In relation to the SA Report, Regulation 12 (2) of the SEA Regulations requires that: "The report must identify, describe and evaluate the likely significant effects on the environment of - (a) implementing the plan or programme; and (b) reasonable alternatives, taking into account the objectives and the geographical scope of the

plan or programme.” The SEA Regulations require that the alternative policies and site allocations considered for inclusion in a plan that must be subject to SA are ‘reasonable’, therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the NPPF) or site allocation options that are unsuitable, unavailable or undeliverable.

- 4.7 Given this, the scope to identify reasonable alternatives for the Euston Area Plan Update in relation to policy objectives is limited. Furthermore, policies have been developed to respond to local circumstances and deliver Council priorities, meaning that not having a policy or solely relying on the National Planning Policy Framework and the London Plan, is not considered to be a reasonable option.
- 4.8 The SA for the adopted EAP identified the following strategic options:
- *Issue 1. Whether to produce an Area Action Plan for Euston*
 - *Issue 2. Approach to level of growth*
 - *Issue 3. Approach to location of growth*
 - *Issue 4: Station design and development strategy options*
- 4.9 The adopted EAP (2015) was developed on the basis of a set of objectives, which have been refined and updated for the purposes of preparing this EAP Update. In light of these updated objectives, the changing wider context and updated strategies and policies, the decision has been taken to explore reasonable alternatives (RAs) in respect of:
- *Issue 1. Approach to level of growth*
 - *Issue 2. Approach to land use taking into account reduction in land available for development in the Euston Stations Masterplan area*
 - *Issue 3. Approach to building heights*
 - *Issue 4: HS2 Station Design, futureproofing and station expansion*
- 4.10 This revised SA in 2025 provides an evaluation of policy options to ensure that negative impacts on sustainability are minimised and benefits maximised. The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. There will often be an equal number of positive or negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as consultation responses, deliverability and conformity with the NPPF will also be taken into account by plan-makers when selecting preferred options for their plan. For this SA, a number of strategic options have been evaluated and the Sustainability Appraisal has produced the following recommendations regarding the strategic options:

Issue 1: Approach to level of growth

Option 1b) Reduce indicative capacity shown in the EAP to reflect site constraints and emerging station designs/ principles

Issue 2: Approach to land use taking into account reduction in land available for development in the Euston Stations Masterplan area

Option 2b) Proportionally distribute land uses across the station masterplan area.

Issue 3: Approach to building heights

Option 3b) Increase indicative height on sites in line with the London Viewing Management Framework (LVMF)

Issue 4: HS2 Station Design, futureproofing and station expansion

Option 4a) HS2 6 platform station with futureproofing to provide future station expansion with development above futureproofed area

Appraisal of strategic principles and development principles

- 4.11 The overall EAP strategy has remained largely unchanged from the approach taken in the 2015 EAP. The EAP strategy would be likely to generate several positive sustainability impacts. This reflects the fact that the broad intentions of the strategy are to enable the delivery of additional homes, maximising potential economic benefits and locating developments in a way which reduces the need to travel. The distribution of development, and approach to public realm and urban greening would help to meet a number of the sustainability criteria relating to air quality, sustainable modes of travel, healthy communities and social inclusion. In delivery of the overall strategy there is a need to ensure that investment delivers benefits where they are most needed, maximising social value at planning, construction and end user phases plus ensuring that all aspects of development promote health and wellbeing and address concerns around safety and security.
- 4.12 The land use strategy would likely have a positive impact across the sustainability criteria, providing a balance of uses to meet a range of needs and helping to promote national growth with the strengthening of the world leading knowledge quarter inclusive innovation district. The urban design strategy would also be likely to generate a number of positive impacts, due to the environmental, accessibility and public realm improvements that would result from improved connections, spaces and buildings. Whilst the transport strategy would also be likely to generate positive impacts, it could have potential negative impacts in terms of noise and air pollution resulting from increased transport provision especially during the project(s) construction. The environmental strategy would be likely to provide a range of positive impacts due to improvements to energy and climate change mitigation. The Open Space strategy would give rise to social and local environment benefits resulting from an emphasis on open space and green infrastructure
- The area based principles (Places chapters) would each be likely to generate social, environmental and economic benefits, each providing land use, design, transport/public realm and environmental measures to ensure growth meets sustainability objectives.

- The potential for estate renewal, while delivering sustainability benefits overall (for example in relation to the delivery of homes, regeneration and improved streets and spaces), may cause short term disruption to communities due to the level of development activity that may result.

The difference that the SA process has made in shaping the EAP update

- 4.13 As with the previous SA, this Sustainability Appraisal process has helped to confirm that the policies and area-based principles represent sustainable options, and has informed how they should be developed with regard to their environmental, social and economic impacts.

5. EUSTON AREA PLAN CONTENT, VISION, THEMES AND OBJECTIVES

Vision for Euston

- 5.1 The 2015 EAP vision and objectives were informed by the results of public consultation (initial consultation in winter 2012 and draft EAP in summer 2013), conversations with stakeholders, previous aspirations for the area, research and specialist technical reports commissioned to inform the production of this plan.
- 5.2 The vision remains broadly the same as the 2015 EAP vision however instead of a vision for Euston until 2031, the EAP seeks to provide a vision until 2051 to reflect more realistic development timeframes.
- 5.3 In the 2015 EAP there were originally 11 objectives. These were adapted since first published to reflect consultation feedback, the Examination process and the results of the previous Sustainability Appraisal.
- 5.4 The EAP objectives have now been updated to reflect the wider context, updated priorities and feedback from engagement. There are now nine objectives in the EAP, listed below:
- 1) **Prioritising local people's needs:**
This objective has been updated to ensure that development delivers economic, social and environmental benefits embedding Social Value into planning, construction and operational activities. The objective also ensures that people are made part of Euston's growth and that meanwhile uses create places and help to mitigate the impacts of construction.
 - 2) **Securing excellent design:**
This objective has not changed.
 - 3) **Making the best use of new space above the station and tracks and opportunities for regeneration in the wider area:**
This objective has been revised to ensure that the station and interchange redevelopment also enables comprehensive development of the area above and adjacent to the station and tracks.
 - 4) **New streets and enhanced routes**

This objective has been revised to highlight that it is integral that legible and attractive access to the new development should be provided above and around and through the station to address existing access difficulties to get across the station.

- 5) **Boosting the local, wider London and national economy by reinforcing existing economic knowledge, cultural and community assets and businesses while also facilitating new growth and positive change that supports the Knowledge Quarter inclusive innovation district**

This objective combines former objectives 5 & 11 and reflects importance of the Knowledge Quarter innovation district.

- 6) **Creating sustainable development:**

This objective has been revised to relate better to policy, highlighting that development must respond to the climate crisis by ensuring Euston be a place that is perceptibly green in all respects and which integrates high environmental standards, active and sustainable travel, planting, biodiversity, an integral network of open spaces and green infrastructure, supporting a circular economy and contributing to improvements in air quality. It removes specific reference to local low carbon energy networks.

- 7) **Improving the environment along Euston Road:**

The revisions to this objective include additions of creating an emblematic and landmark point of arrival to Euston and London that is inviting, draws in visitors and actively facilitates movements of people and goods safely prioritising pedestrian links, legible and well-connected from all points, with improved crossing opportunities reducing the barrier between the north and south balanced with high quality and reliable bus provision throughout. Providing a green artery with much improved air quality that is accentuated by trees and restored and green Euston Square Gardens, a street whose public realm reflects the range of character areas and enhances world-class knowledge and innovation institutions along its length.

- 8) **Promoting sustainable and active travel**

This objective has been revised to include active travel and ensure that it is easier and safer to walk and cycle along and across the main streets of Euston. To reduce air pollution and noise, reduce all road casualties and improve the pedestrian and cyclist experience on the streets. This would be achieved through greening, improved infrastructure for pedestrians and cyclists and reduce the dominance of motor vehicles.

- 9) **Enhancing public transport:**

This objective combines former objectives 9 & 10 has been revised to include adequate land safeguarded for new transport infrastructure such as Crossrail 2

From the 2015 EAP, the following objectives have been merged into existing objectives. This followed engagement feedback and in order to make the objectives concise.

- 10) *Planning for future public transport.*

This objective has been amalgamated into objective 9 above.

- 11) *Deliver a new world class Euston station and integrated development.*

This objective has been amalgamated into objectives 3 and 5.

6. BASELINE, CONTEXT AND SUSTAINABILITY ISSUES AND OBJECTIVES

- 6.1 The SA Scoping Report 2021 for the Euston Area Plan reviewed existing plans, programmes and sustainability objectives; sets out the existing baseline and key sustainability issues; and establishes the sustainability appraisal framework to be used in the appraisal process. This section summarises this context and sets out the sustainability objectives that provide the framework for assessing the sustainability of the Area Plan. It should be noted that since the Scoping Report was written, a new Government is in place and some national plans and sustainability objectives have been superseded or changed.

Review of relevant plans programmes and sustainability objectives

- 6.2 Schedule 2 of the SEA Regulations requires: (a) “an outline of the...relationship with other relevant plans or programmes”; and (e) “[that] the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”. Identifying and reviewing these documents is an important element of the SA and SEA process, as it can help to shape the objectives against which the Plan should be appraised, as well as indicating any particular issues and problems that need to be addressed. Potential synergies, inconsistencies and constraints can also be identified.
- 6.3 Table 2 below lists the key plans, programmes and sustainability objectives that were reviewed in the early stages of the SA process. The full review is provided in Appendix 2 to the 2021 Scoping Report which provides a review of additional plans, policies and programmes. Since the 2021 Scoping Report, a number of policy documents and guidance have been revised or superseded and listed below and a review is provided in appendix E: Updated Plans and programmes

Table 2 Relevant plans, programmes and sustainability objectives

	Ref No.	Document title
National/ international	1	National Planning Policy Framework 2024 National Planning Practice Guidance
	2	Transforming our world: the 2030 Agenda for Sustainable Development
	3	Environment Act 2021
	4	Environmental Improvement Plan: annual progress report 2024 to 2025
	5	Global Air Quality Guidelines
	6	National Framework for Water Resources 2025: water for growth, nature and a resilient future
	7	The Separation of Waste (England) Regulations 2025
	8	The Historic Environment in Local Plans: 1
	9	Managing Significance in Decision Taking in the Historic Environment: Good Practice Advice Note 2
	10	Conservation Area Designation, Appraisal and Management (Historic England, 2019) Historic Advice Note 1 (second edition)
	11	The Setting of Heritage Assets – 2nd Edition (Historic England, 2017)
	12	Tall buildings Historic England Advice Note 4 (2022)
	13	UK Biodiversity Framework
	14	The Community Infrastructure Levy Regulations 2010 and amendments 2019
	15	Thames Abstraction Licensing Strategy (Environment Agency, 2019)
	16	Fair Society, Healthy Lives - The Marmot Review (post-2010)
	17	Land contamination risk management (LCRM) 2021
	18	Environmental Noise (England) Regulations 2006
	19	BREEAM
	20	Flood and Water Management Act 2010
	21	Passivhaus
	22	The UK's Plans and Progress to Reach Net Zero by 2050
	23	Integrated National Strategy: a call for ideas
	24	Safer Places: The Planning System and Crime Prevention (Home Office/ODPM 2004)
	25	Planning policy for traveller sites 2024
	26	Gear change: A bold vision for cycling and walking.
Regional (London)	27	The London Plan 2021 and Supplementary Guidance
	28	Mayor's Transport Strategy 2022
	29	London Growth Plan
	30	London Housing Strategy 2018
	31	2024 edition of Housing in London
	32	Housing Design Standards LPG 2023
	33	Homes for Londoners: Affordable Housing and Viability SPG 2017

	34	London's Environment Strategy 2018
	35	London Health Inequalities Strategy 2018
	36	London Surface Water Strategy 2025-30
	37	London Infrastructure Plan 2050
	38	Accessible London: Achieving an inclusive environment (GLA 2014)
	39	Capital Gains: A Better Land Assembly model for London 2018
	40	The Mayor's Sustainable Design and Construction: SPG 2014
	41	Social Infrastructure SPG, 2015
	42	Shaping neighbourhoods – play and informal recreation SPG 2012
	43	Shaping neighbourhoods: character and context 2014
	44	London View Management Framework SPG 2012
	45	Mayor London's Culture Strategy 2018
	46	Culture and the Night-Time Economy SPG 2017
	47	Crossrail funding SPG
	48	Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy SPG
	49	Sustainable Transport, Walking and Cycling
	50	The Control of Dust and Emissions during Construction and Demolition SPG (July 2014)

Local (Camden)	51	We Make Camden
	52	Regulation 19 Submission Draft Local Plan 2025
	53	Camden Planning Guidance
	54	Camden Infrastructure Delivery Plan 2025
	55	Camden Conservation Area Appraisals
	56	Camden Character Study 2015
	57	Local Housing Needs Assessment 2025
	58	Economic Needs Assessment 2023
	59	Camden Local Plan Viability Study 2025
	60	Retail and High Streets Needs Assessment 2024 (Part 1) Retail and High Streets Needs Assessment 2024 (Part 2) Retail and High Streets Needs Assessment 2024 (Part 3)
	61	Gypsy and Travellers Site Identification Study 2024 Gypsy and Traveller Site Identification Study Appendices
	62	Camden Clean Air Action Plan 2023-2026
	63	Strategic Flood Risk Assessment 2024 Addendum to the Strategic Flood Risk Assessment 2025
	64	London Borough of Camden Annual Monitoring Report 2023-4
	65	Housing Trajectory 2026-2040
	66	North London Waste Plan 2022 and North London Joint Waste Strategy 2025-2040
	67	Camden Health and Wellbeing Strategy, 2022-30
	68	Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041
	69	Camden Biodiversity Action Plan
	70	Camden Climate Action Plan 2020-2025
	71	Camden Annual School Places Planning 2024
	72	Camden Open Space, Sport and Recreation Study Review; Atkins; 2014
	73	Camden Reduction and Recycling plan
	74	Delivering Net Zero – An evidence study 2023
	75	Camden's Adaptation and Resilience Plan (2023 to 2025)
Euston specific	76	Euston Social Value Charter
	77	Euston Open Space Study part1 2023 Euston Open Space Study part2 Euston Open Space Study part3
	78	Euston Economic Impact Assessment
	79	Avison Young Euston Area Plan- Retail Planning Issues November 2022
	80	Euston Area Plan sports needs assessment 2022
	81	Health Impact Assessment
	82	Equalities Impact Assessment
	83	Euston Area Plan Historic Area Assessment 2014
	84	Euston Area Plan Energy Masterplan report 2013
	85	Community-led Heritage Assessment 2019

Baseline characteristics

- 6.4 Schedule 2 of the SEA Regulations requires that the Environmental Report includes descriptions of: “(3) The environmental characteristics of areas likely to

be significantly affected.” Baseline information for the Borough of Camden was established in the SA Scoping Report from the Camden Local Plan and Site Allocations. This information has been amended to provide more up-to-date and more Euston-specific baseline information, where available. The baseline information has been collected under a number of subtopics, which can be classified as environmental, social or economic. To demonstrate how the SEA topic areas (as set out in Appendix 1 of the SEA Directive) have been covered, these are included in brackets beside the relevant SA subtopic as follows:

Environmental

- Transport and connections (*air, human health, climatic factors*)
- Cultural heritage and landscape (*cultural heritage, landscape*)
- Open space (*landscape, human health*)
- Biodiversity, flora and fauna (*biodiversity, flora and fauna*)
- Air quality (*air, human health, climatic factors*)
- Soil (*soil*)
- Water and flooding (*water, climatic factors*)
- Noise and vibration (*population, human health*)
- Climate factors (*energy use, sustainable construction, SUDS*)
- Recycling and waste management (*population, human health, water*)
- Development on previously developed land (*material assets, soil*)

Social

- Population (*population*)
- Health and community (*human health*)
- Deprivation and social exclusion (*population*)
- Education (*population*)
- Housing (*material assets, population*)
- Leisure (*human health*)

Economic

- Town centres and Employment

- 6.5 Under each of these subtopics, a number of baseline indicators have been identified. It is these indicators that have been used to describe the baseline situation and will be used to measure the performance of the Area Plan against the SA objectives. Table 3 below shows the indicators that describe the various elements of Camden’s environment. These have been selected as it was considered that they provided a comprehensive picture of the borough (and, where possible, the Euston area) as it is now and would be able to be monitored in the future to measure the progress of the Area Plan in achieving sustainable development. Appendix D (at the end of the document) shows the list of criteria and potential indicators relative to each SA objective.

Table 3 Baseline indicators

Environmental indicators	
Transport and traffic (commentary will be included to reflect potential impacts of Covid-19)	<ul style="list-style-type: none"> • Location of major transport demand generating developments • Number of agreements signed for car-free or car capped housing • % reduction in motor traffic flows through the borough • Proportion of resident trips by walking or cycling • % increase in walking as share of modal split • % Increase in cycling as share of modal split • % Increase in bus passenger journeys
Cultural heritage and Landscape	<ul style="list-style-type: none"> • Conservation areas • Designated and non-designated heritage assets • Heritage at risk • Extent of archaeological priority areas • Number and condition of scheduled ancient monuments
Open space	<ul style="list-style-type: none"> • Open spaces • Open space deficiency • Open space lost as a result of HS2 works • Area of designated open space /improvements to open space • Number of Tree Preservation Orders (TPOs) served • Number of applications affecting trees protected by TPOs • Number of applications permitted that involved the loss of trees protected by TPOs
Biodiversity, flora and fauna	<ul style="list-style-type: none"> • Change in priority species (by type) • Change in priority habitats (by type) • Net loss/gain of Sites of Nature Conservation • Importance and other sites of special biodiversity value, such as open spaces
Air quality	<ul style="list-style-type: none"> • Carbon dioxide (CO2), Nitrogen dioxide (NO2) and particulate matter (PM10) emissions
Soil	<ul style="list-style-type: none"> • Number of sites of potential land contamination
Water and flooding	<ul style="list-style-type: none"> • Water quality • %/Number of new developments incorporating water conservation measures (e.g. SUDS) • Water use • Number of properties at risk from 1% and 0.1% Floods
Noise and vibration	<ul style="list-style-type: none"> • Number of noise complaints received by the Council • Number of important areas 'noise hotspots' defined by Defra
Climate factors	<ul style="list-style-type: none"> • Carbon dioxide emissions • Climatic events • Proportion of energy generated from renewable sources • Domestic energy efficiency

Recycling and waste management	<ul style="list-style-type: none"> • % of household waste recycled
Development on previously developed land	<ul style="list-style-type: none"> • % of housing on previously developed land • % of vacant buildings
Socio-economic indicators	
Population	<ul style="list-style-type: none"> • Population by age and sex • Population by ethnic group • Population by place of birth • Population growth • Household size and composition • Population density (persons/ha) • Household projections
Health and community	<ul style="list-style-type: none"> • Healthy life expectancy • Major causes of death • People using outside space for health/exercise • Proportion of active adults • Excess weight in adults • Excess weight in 4-5 and 10-11 year olds • Air quality health impacts • Camden Primary healthcare estate • Accommodation for older people • Accommodation for people with extra/complex needs • Levels of crime • People with limiting long term illness • Distance of households from GPs and hospitals/ access to GP per 1000 • Number of GPs or primary care professionals in Camden • Number of sports/playing fields and outdoor recreation spaces • Number of hostels and care homes
Deprivation and social exclusion	<ul style="list-style-type: none"> • Household income • Number of Super Output Areas (SOAs) within 10% most deprived in England • Life expectancy • Fuel poverty • Claimant count unemployment rate • Households with children in families on key benefits • Unemployment by ward
Education	<ul style="list-style-type: none"> • Area of new education facilities created • School capacity (pupil place calculation) and areas of education provision deficiency • Number of NEET's (young people not in education, employment and training)
Housing	<ul style="list-style-type: none"> • Housing stock by tenure • Dwellings by type • Overall need • Housing composition

	<ul style="list-style-type: none"> • Condition of housing stock – unfit dwellings by tenure, overcrowded households • House prices and rents • Ratio of average house price to earnings • Housing with special needs • Number of new homes completed • Student housing completions • Affordable housing completions • Mix of housing sizes • Vacant housing units • Number of affordable housing completions • %/number of all new housing units designed with Part M wheelchair accessibility
Town Centres and Employment	<ul style="list-style-type: none"> • Completed retail, food, drink and entertainment floorspace • Vacancy in town centres and other designated frontages • Retail, food, drink and entertainment uses • Employment floorspace completed and available • Growth areas projected floorspace • Industrial structure and key sector • Supply of employment land • Number of secured apprenticeships in Camden

6.6 Appendix 4 of the EAP Scoping 2021 for the EAP update sets out the detailed baseline, updating the baseline information provided in the SA since the 2015 EAP. The baseline data has now been updated in 2025 following further Census and other data being available since the 2021 Census (Appendix F).

Key sustainability issues

6.7 Building on the review of plans, programmes and sustainability objectives and the baseline information, the SA Scoping Report for the Euston Area Plan update identifies key sustainability issues that the Plan will need to address. The key issues for the area are highlighted in the Scoping Report and are set out in table 3 below. These sustainability issues have been updated where relevant new information and supporting evidence has been collected.

Table 3 Sustainability issues for the Euston Area Plan update to address

Issue	Summary and Source of Evidence
Environmental	
Development pressures and protecting the historic environment	<p>There are three Conservations Areas within and adjacent to the Euston Area Plan boundary, along with a number of listed buildings.</p> <p>There are also many designated and non-designated heritage assets within and in areas adjacent to the Area Plan boundary some of which could be affected by development in the area.</p>

	<p>There is one Tier 2 Archaeological Priority Area (Cumberland Market) within the EAP boundary.</p> <p>Conservation Areas (CAs) that overlap the study area boundary include Camden Town CA to the north east, Regent's Village CA to the north west and Bloomsbury CA to the south. Euston Square Gardens, which has been temporarily lost due to HS2 and is due to be re-provided, is located within Bloomsbury Conservation Area.</p> <p>Several open spaces in the EAP boundary area are designated London Squares under the London Squares Preservation Act (1931). The Act limits the use of London Squares to 'ornamental pleasure grounds or grounds for play, rest and recreation'. The only buildings allowed are those which are 'necessary or convenient for, and in connection with, the use and maintenance of such squares'. Protected London Squares within the study area include: Amptill Square, Euston Square Gardens, Munster Square, Clarence Gardens and Harrington Square Gardens</p> <p>The Council needs to ensure that development does not cause harm to the significance of heritage assets and where possible enhances their character and appearance.</p>
<p>Promoting zero carbon Camden by 2030 with energy efficiency and renewable energy.</p> <p>Where there are significant travel-demand generating uses, sustainable and active modes of travel should be encouraged, enabled and prioritised in these locations. Reducing carbon dioxide emissions to meet the Borough's targets and mitigating the effects of climate change.</p>	<p>There is a nationally recognised need to increase the energy efficiency of new and existing buildings and install more renewable energy facilities on new and existing buildings (NPPF).</p> <p>In November 2019, Camden Council formally declared a Climate and Ecological Emergency, recognising not only the threat of climate change but also the impact of irreversible damage to ecosystems, and committed to do everything it can to make Camden net zero carbon by 2030. Camden Annual Review 2023-2024 highlights</p> <p>Government data shows that 'direct' carbon dioxide emissions in Camden have reduced by 48% since 2005.</p>
<p>Limited scope for creating new open space. There is a deficiency of open space in the Euston area in terms of accessibility of high quality usable open spaces.</p>	<p>Regents Park is nearby, providing residents of the sub area with easy access to a Metropolitan Park, which provides a range of informal and formal recreational facilities. Areas to the east of the Regent's Park area; and to the south west of the Somers Town area are deficient in terms of access to play space.</p> <p>Open spaces have been lost in the Euston Area due to HS2 construction works including Hampstead Road Open Space, St James Gardens, along with the temporary loss of Euston Square Gardens (east and west), during construction. The loss of open space in terms of quantity has been significant</p>

	<p>and is likely to have increased pressure and visitor activity in nearby open spaces.</p> <p>Various open spaces and play spaces have been upgraded with HS2 funding since construction started to help to mitigate this impact.</p>
Need to effectively recycle and manage waste from construction projects to conversion of existing buildings using Circular Economy principles.	<p>The population of the borough will increase considerably over the next ten years, increasing the need for our waste to be sustainably managed.</p>
Air quality in Camden is poor and does not meet the air quality standards for nitrogen dioxide and particulate matter.	<p>Camden has some of the poorest air quality in Europe, especially in the south of the borough where traffic congestion is severe.</p> <p>Data from Imperial College London suggests that air pollution in Camden causes around 109 early deaths each year.</p> <p>Commercial buildings are the main source of air pollution in Camden, contributing about 47% of NO₂ emissions and 51% of PM_{2.5} emissions in the borough. Domestic buildings and road vehicles are other important sources of pollution in the borough. The main sources of pollution from domestic buildings come from the burning of wood (including charcoal and other solid fuels), and fossil fuels (in gas boilers and other gas appliances) for heating and cooking.</p> <p>As well as affecting air quality and health locally, PM_{2.5} can be transported long distances from its sources and can therefore pose a health risk for a much larger population. A significant amount of the PM_{2.5} in Camden is from sources outside London, including from polluting activities elsewhere in the UK and in Europe.</p> <p>In 2024 Camden had five automatic monitoring stations monitoring nitrogen dioxide and particulate matter of which one is located as a roadside monitor at Euston Road.</p> <p>The key areas linking planning and air quality are road transport, construction, energy generation, and the operation of certain industrial processes. Each serves as a source of pollution emissions that should be mitigated. It is important that the planning system plays its part in helping reduce emissions in the borough. Camden is working to address this issue by: reducing transport emissions, reducing emissions from buildings and new developments.</p>
Potential contamination on previously developed land	<p>While no sites in the borough are currently designated as contaminated for the purposes of the Environment Act 1990 Part II A, numerous sites in the borough have been</p>

	<p>previously utilised for heavy industry and other polluting uses and this may pose contamination problems for future development on such sites, especially given development is on previously developed land.</p> <p>There are no historic watercourses in the Euston area and the area is just outside a Local flood risk zone.</p>
<p>Risk of surface water and groundwater flooding in parts of Camden due to increase in the amount of built land</p>	<p>Flooding from surface water and sewer sources pose the greatest risk to flooding in the borough, and the risk is interconnected, due to the prevalence of the combined sewer system. Camden experienced significant flooding in 1975, 2002, and 2021, and the probability of such events recurring is likely to increase as a result of climate change. Camden also experiences some flooding from groundwater sources particularly in areas to the south of the borough.</p> <p>Although there are no areas at risk of flooding from rivers or the sea there are approximately 38,800 properties in the Camden within areas at risk of surface water flooding at potential depths of >0.1m, and 12,700 properties in areas at risk of flooding to potential depths of >0.3m. (Environment Agency)</p> <p>The proportion of developed land (impermeable surfaces) in Camden increases surface water flooding risks, so it is important that development considers appropriate measures of drainage. Parts of the Euston Area have a high chance of yearly flooding due to surface water.</p> <p>Two storm events occurring on the 12 and 25 July 2021 disrupted infrastructure due to flooded roads and stations, including the mainline to Euston which halted rail services.</p>
<p>Water supply and use</p>	<p>Camden is within Thames Water's London Water Resource Zone which is classified as 'seriously water stressed.' By the Environment Agency. This means there is a high population with high water demands and limited water availability.</p> <p>Part of the Euston Area Plan boundary Areas is designated as a Secondary A aquifer which is capable of supporting local water supply. As such, groundwater is sensitive in this area and the quality and quantity of groundwater needs to be protected.</p> <p>Figures from Thames Water 2021/22 report indicate that daily water consumption in London was 144.4 litres per capita. The London Plan requires new developments to achieve daily consumption of 105 litres of less per capita.</p>
<p>There should be no further decline in priority species and we need to seek ways to protect and</p>	<p>Camden Biodiversity Action Plan identified priority species. The Borough needs to ensure that priority species do not further decline in the borough and receive adequate protection and encouragement through the planning process.</p>

enhance/increase their habitats.	<p>There are 4.56ha of sites that are managed for nature conservation in the Borough of Camden. Existing Sites of Important Nature Conservation provide important habitats for priority species and other flora and fauna in the borough, which need to be protected from future development.</p> <p>Two open spaces adjacent to the EAP boundary area are designated Sites of Importance for Nature Conservation (SINC); Regent's Park (Metropolitan Grade SINC) and Gordon Square (Local Grade SINC). St James's Garden which has been lost as a result of HS2 construction work was a Local Grade SINC. Other sites just outside the EAP area boundary include St Martin's Gardens, St Pancras Gardens (Borough Grade II) and Regent's Canal (Metropolitan). The whole of the EAP area is included within Bug life's B-Lines network. B-Lines are areas that have been identified as priority areas to restore wildflower rich pollinator habitat.</p>
Increased pressure on waste management facilities	<p>The increase in the population of the Euston area in the future will place increased pressure on existing waste management facilities and highlights the need to ensure waste is managed efficiently and where possible reduced, reused and recycled.</p> <p>16% of a Camden resident's environmental impact comes from buying new items for the home and every year Londoners throw away 2 million tonnes of waste, enough to fill the Thames.</p>
Sustainable design and use of resources	<p>Improvements in building design is needed will to promote energy conservation and efficiency resulting in reduced energy consumption. This will assist in reducing air pollution and carbon dioxide emissions from generating power for heating and electricity.</p> <p>As part of the Future Neighbourhoods Programme, Internal Wall Insulation upgrades have been made to 50 homes in Somers Town.</p>
Social	
Meeting the housing needs of ever changing and expanding population	<p>Between the last two censuses (held in 2011 and 2021), the population of Camden fell by 4.6%, from around 220,300 in 2011 to around 210,100 in 2021.</p> <p>Therefore Camden was one of only three local authority areas in London to see its population decline. The regional population increased by 7.7%, while the population of England increased by 6.6%.</p> <p>The GLA's <i>2021-based Interim Projections</i> forecast Camden's population in line with planned residential development. Between 2023 and 2033, Camden's population is forecast to increase by 9,600 (4.4%). Future growth is due to positive natural increase (births outstripping</p>

	<p>deaths) of +12,100 and a loss of -2,500 due to net migration over the 2023-33 period.</p> <p>Camden is projected to see a decline in adults aged 20-44 years by 2041 as young adults are projected to leave to find more affordable and available accommodation elsewhere. However, all other groups are projected to rise. The most significant rise is in the population aged over 65 years, which represents a growth of 15,034 persons in the Borough, with a growth of 3,337 in those aged 65-69 years or more. This outcome is dependent upon the older population remaining in Camden as they age and not moving elsewhere, which has tended to happen in the past. There was growth in the older population between 2011 and 2021, but this was in the context of the overall population being under-estimated by the 2021 census. There are currently a very high number of people aged 45 years and above in Camden and if they do not migrate away then the older person population will grow rapidly.</p> <p>The Camden Local Plan Proposed Submission Draft aims to deliver 11,550 additional homes (770 homes per year) in Camden over the Plan period 2026/27 to 2040/41. The housing target in the draft Local Plan is a capacity-based target, comprising all expected housing delivery over the Plan period (from sites with planning permission and allocated sites), including a windfall allowance for smaller sites (non-major development). The target also reflects the delay associated with HS2 and development at Euston, assuming delivery within the Local Plan period of 875 homes from sites encompassed by the Euston Area Plan (in addition to delivery from existing permissions). This compares with the target of 1,500 to 2,500 additional homes in the draft update of the Euston Area Plan published for consultation in January 2023.</p> <p>In the EAP period (up to 2051), there is assessed capacity for upwards of 2,000 in the Euston area. The Council are also working with the Ministry of Housing, Communities and Local Government (MHLG) led Housing Delivery Group to identify additional opportunities for housing delivery.</p> <p>Housing in Camden is some of the most expensive to rent and buy in the UK, and there are not enough affordable homes for everyone. The shortage of decent and affordable housing of all types and tenure is leading to people moving out of Camden – and many people who have grown up in the borough cannot afford to stay, especially when they start a family.</p>
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	<p>By 2050 the number of residents in the Euston site area is estimated to increase to 11,600 which is an increase of 2,200 from 2025.</p>
<p>The affordability of housing and the supply of affordable housing in the Euston area</p>	<p>Camden's housing landscape is characterized by an almost even split in housing tenure, with approximately 30% of residents owning homes, 36% renting privately, and 34% living in social housing. The borough has some of the UK's highest house prices, averaging £797,520 in 2024, with private rents consuming nearly two-thirds of median income (median rent is £2,102 and median pay £3,333). Social housing waiting lists increased by 8% to 8,028 households by March 2024, and rough sleeping rose by 26% to 903 people in 2023/24.</p> <p>The cost of housing relative to income is a major issue for Camden.</p> <p>The Euston Area Plan area has a high proportion of socially rented households (approximately 65%) with a lower share of owner-occupied homes and a smaller proportion of private renters compared to London overall.</p>
<p>Wide disparities between deprived and affluent areas in the Euston area</p>	<p>There are wide disparities of deprivation and affluence within Euston area wards compared to the rest of the Borough. Over two thirds of households in the EAP area are households with at least one dimension of household deprivation with 10% of households having all four areas of deprivation (education, employment, health and housing).</p> <p>According to Annual Survey of Hours and Earnings, ONS for 2023, median gross annual pay for full-time employees living in Camden is £44,973. Camden's median gross annual pay is lower than for Central London (£46,486), but higher compared to Greater London (£41,853) or UK (£34,963).</p>
<p>Large health inequalities within Camden</p>	<p>The 2021 Census reports that Camden had a greater proportion of its population with a disability or long-term condition that limited their day-to-day activities (15.2%). This is the 2nd highest proportion amongst London boroughs and compared with the London average (13.2%) Camden had a higher proportion of people in bad or very bad health (5.1%) and ranked 3rd highest in London, while the London average was 4.3%.</p> <p>For local health and wellbeing it is important that Camden continues to provide measures to help reduce car use and promote more sustainable and active forms of travel.</p>

	<p>According to NHS data, almost 1 in 5 children in Camden are overweight or obese by reception year (20.2%), which is similar to London (20.9%) and lower than England (22.1%)</p>
Poor housing conditions and overcrowding	<p>In Camden, in 2025, households living in social rented housing are more likely to be overcrowded. According to ONS data 2021, overall, there are 8,840 households that are overcrowded and 6,155 of these are socially rented, that is 6.96% of total households in Camden or 19.5% of the socially rented households - nearly 1 in 5</p> <p>In 2024, it was confirmed that 232 households in the Regents Park Area within the EAP boundary are on a waiting list due to overcrowding. Of those on the waiting list:</p> <ul style="list-style-type: none"> • 168 households need 1 extra bedroom • 59 households need 2 extra bedrooms • 5 households need 3 extra bedrooms
Education inequalities and increased demand for school places	<p>In 2024 more than 2 in 3 children, at 69.8%, achieved a good level of development in early years education in Camden, higher than the England average (67.9%), but just slightly lower than average for the rest of London (70%)</p> <p>Longterm growth in the Euston and King's Cross areas will generate demand for additional school places/ facilities (source: Camden Children, Schools and Families).</p> <p>Camden is home to the 3rd largest student population in London, with 29,965 higher education students living in Camden: 61% are women and 56% are from overseas. 25% of students live in university halls of residence or properties, with a high proportion in the Euston area, given its proximity to a number of universities.</p>
Reduce levels of crime and fear of crime	<p>The crime rate has continued to increase in Camden and was 201 offences per 1,000 people in 2024, driven by a continuing rise in the number of thefts.</p> <p>According to GLA datasets, in 2025 Camden has the second-highest crime rate in London, behind only to the City of Westminster. A household survey of Euston residents suggests that perceptions of crime are high.</p>
Economic	
Unemployment and Job Opportunities for local people	<p>The employment rate in Camden in 2023 was 71.5% as a share of the working-age population, lower than the London rate of 74.6%, and the England rate of 76%. While economic inactivity, the inverse of economic activity, is relatively high in Camden, a significant share of that is due to the large student population in the borough. Students constitute 45% of economically inactive people in the borough, while a little over 20% of economically inactive people are experiencing long-term sickness.</p>

	<p>The claimant count in Camden has increased substantially since the pandemic, following a similar pattern in London and England. As of December 2024, 5% of the working-age population were receiving unemployment benefits in Camden, slightly less than in London (5.8%) but more than England (4.2%).</p>
Need to support development in existing centres and ensure the health of town centres.	<p>Vacancy rates in Camden's centres dropped from 8.19% to 6.63% between 2022 and 2024, demonstrating a return to pre-pandemic levels of near 6%.</p> <p>Vacancy rates in Central London Frontages are however higher, at just over 9%. This is linked to a number of units currently being refurbished or redeveloped (8%).</p> <p>The Government's changes to the Use Classes Order and Permitted Development Rights have reduced the Council's ability to influence planning and development within centres, including policies for managing the mix of uses in centres and frontages.</p> <p>The proportion of vacant shops on shopping streets is an important indicator of the health of that centre. Camden retail surveys have tracked changes in vacancies over time at a centre level.</p> <p>Vacancy rates for retail space in Camden Town (a designated Town Centre, just outside the EAP boundary) have risen slightly since 2019 but remain low compared with the UK average, particularly given the size of the centre.</p> <p>Albany Street is a Neighbourhood Centre as defined in Camden Local Plan 2017. The centre comprises three small clusters of shops and services (20 occupied units in total) focused along Albany Street and Robert Street. According to the Camden Retail and High Street Needs Assessment 2024, Albany Street appears to be a healthy centre with a limited range of uses and a low vacancy rate.</p> <p>Drummond Street is also a Neighbourhood Centre consisting of 41 occupied units. The Camden Retail and High Street Needs Assessment highlights that the centre's vacancy rate has risen by 7.14% since 2019, notwithstanding that it remains below average levels. This will need to be monitored to see if it is a temporary or more long term issue, potentially related to disruption caused by HS2 construction works.</p>
Ensure range of provision for employment clusters to accommodate need	<p>Camden has a strong knowledge economy, and many businesses are service oriented rather than production. Based on Standard Industrial Classification (SIC) data, over a quarter of these businesses in Camden were in the</p>

	<p>Professional, scientific & technical industry (29% compared to 20% in London), and 15% were in the Information & communication industry (compared to 12% in London). In London and Camden both, 9% of businesses are in Business administration and support services, and 8% are in Arts, entertainment, recreation and other services.</p> <p>In 2024 there were 36,290 enterprises operating in Camden, and 215 of those had over 250 employees. 3,445 new businesses have opened, and 2,860 closed</p> <p>Employment in Camden is relatively low and economic inactivity is relatively high in comparison with London and England. This is mostly explained by the large number of students living in the borough, but there are also residents that face significant barriers to accessing employment. (Camden State of the Borough Report 2024)</p> <p>According to the latest data, the estimated employment rate was 74.8% in the year ending September 2023.⁶ This rate is comparable to London (74.6%) and lower than Great Britain (75.8%). (www.nomisweb.co.uk/reports/lmp/la/1946157246/report.aspx?town=Camden)</p> <p>In 2022, 61% of jobs in the borough were located in the central London, to the south of Euston Road; a quarter of jobs (23%) were concentrated in the central Camden Town / Euston / Regent's Park / Somers Town areas; while the remainder of Camden's jobs (16%) were scattered across town centres and employment sites in the north and west of the borough (Hampstead, Kentish Town, Swiss Cottage).</p> <p>Camden specialises in highly skilled, high value parts of the economy such as law, management consultancy and advertising.</p> <p>The largest industrial sector in Camden is Professional, Scientific & Technical enterprises. This provides 83,000 jobs (21% of all jobs), compared with 15% for London as a whole. Employment losses have occurred in Business Administration and Support (-20%), Accommodation and Food services (16%) and Manufacturing (-13%).</p> <p>Camden has a strong night-time economy, both in terms of jobs and number of businesses, mostly concentrated in the South of the borough.</p>
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The Sustainability Appraisal Framework

- 6.8 The Euston Area Plan Update developed in the context of wider policy and is influenced significantly by the Camden Local Plan plans and programmes and policies at an international, national and strategic level. This SA takes into account the relationship between the Local Plan and other relevant policies, plans, programmes and sustainability objectives.
- 6.9 The SA Scoping Report established the appraisal framework for the sustainability appraisal of the Euston Area Plan update. A set of updated sustainability appraisal objectives were produced, taking into account the revised assessment of relevant plans, policies and sustainability objectives, current baseline information and the key sustainability issues identified for the Euston area. It updates the appraisal framework for the EAP 2015, taking into account changes over time and Euston-specific circumstances.
- 6.9 The following set of 16 objectives (in table 4 below) set out in the Scoping Report provide the framework for assessing the sustainability of the EAP.

Table 4 Sustainability Appraisal objectives

	Objective
1	To promote the provision of a range of high-quality and affordable housing to meet local needs
2	To promote a healthy and safe community
3	To ensure access to local shopping, community and leisure facilities.
4	To tackle poverty and social exclusion
5	To improve amenity by minimising the impacts associated with development.
6	To conserve and improve open space provision and increase access to and enhancement of open space.
7	To improve local air quality and limit exposure to air pollution.
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.
11	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area
12	To promote high-quality and sustainable urban design.

13	To protect and enhance the historic environment
14	To ensure new development makes efficient use of land, buildings and infrastructure.
15	To encourage and accommodate sustainable economic growth and employment opportunity.
16	To maximise the benefits of regeneration and development to promote sustainable communities.

- 6.10 The objectives from the 2015 EAP are listed in Appendix 7 of the EAP SA Scoping Report 2021 however have been divided into Environmental, Social and Economic and been reordered to take and revised into account the SA objectives of the Camden Local Plan Proposed Submission Draft. Broadly the objectives are the same as 2015 objectives but the open space objective has been split into two objectives (objectives 3 and 6). Appendix 7 of the Scoping Report highlights the changes in the EAP objectives.

7. TESTING EAP OBJECTIVES AGAINST THE SA FRAMEWORK

- 7.1 A series of objectives were developed to deliver the vision for Euston and to guide the change in the area. As discussed in Section 4, these objectives have been refined and revised since 2015 EAP to reflect changes in policy emphasis, the results of the SA process and to reflect consultation feedback.

Summary of findings

- 7.2 A detailed assessment of the Strategic Objectives is found below along with the justification for the changes to the objectives. Overall the strategic objectives achieve the aim of sustainable development. There are not considered to be any significant conflicts between the EAP objectives and the sustainability framework. It will be important that one objective does not outweigh or preclude achievement of another objective however it is recognised that it will be a balancing act to meet a range of aims.

Euston Area Plan Strategic Objectives Appraisal

Key attributing effects to each objective	
++	Likely large positive impact
+-	Likely positive and negative impacts
0	Uncertain impact or no relationship
-	Likely negative impact
--	Likely large negative impact

EAP strategic objective	1. Prioritising local people's needs	
Sustainability Objectives	Score	Comment
1. To promote the provision of a range of high quality and affordable housing to meet local needs	++	This supports the delivery of new homes to meet the local need. A number of new homes have already been delivered as a result of homes lost for HS2 construction.
2. To promote a healthy and safe community	++	This seeks the re-provision of any open space lost as a result of HS2 construction which contributes to health and wellbeing aims and objectives. The provision of meanwhile uses to help mitigate construction impacts would assist in providing a safe and healthy community.
3. To ensure access to local shopping, community and leisure facilities.	++	This prioritises replacing any lost businesses and new shopping facilities will be provided. The re-provision of and any new community facilities would assist in promoting a safe and healthy community.
4. To tackle poverty and social exclusion	++	This helps to mitigate the impacts of HS2 construction by re-providing lost housing and local jobs.
5. To improve amenity by minimising the impacts associated with development.	+	New meanwhile uses and relocated housing for those most affected will assist in mitigating the impacts of construction.
6. To conserve and improve open space provision and increase access to and enhancement of open space.	++	The re-provision of open space and improving access and quality of spaces will improve the health and wellbeing of local people.
7. To improve local air quality and limit exposure.	0+	There are no significant implications for air quality as a result of this objective. The new and re-provided open spaces could assist
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	0+	The objective seeks to ensure that development delivers environmental benefits.
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	There are no significant implications for protecting or managing water resources.
10. To protect and enhance existing habitats and	+0	Biodiversity could be improved over time in new open spaces.

EAP strategic objective	1. Prioritising local people's needs	
biodiversity and to seek to increase these where possible.		
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	0+	There are no significant implications beyond environmental benefits embedding social value into the construction and operational activities.
12. To promote high quality and sustainable urban design.	0	There are no significant implications for design.
13. To protect and enhance the historic environment	0	There are no significant implications for the historic environment.
14. To ensure new development makes efficient use of land, buildings and infrastructure.	0+	There are no implications in relation to the efficient use of land, buildings and infrastructure except for the potential meanwhile uses during construction.
15. To encourage and accommodate sustainable economic growth and employment opportunity.	+	This helps to support the economy and employment through prioritising the re-provision of jobs and businesses.
16. To maximise the benefits of regeneration and development to promote sustainable communities.	+	This objective focuses on local needs however the objective does promote sustainable communities.
Overall Social impact	+	This objective will have a strong positive social impact as it places a priority on addressing and mitigating the social effects of HS2, through the re-provision of homes, jobs and social infrastructure such as open spaces.
Overall Environmental Impact	0+	This objective is likely to have a slightly positive impact through prioritising the re-provision of open spaces, although there would be a generally neutral environmental impact from the re-provision of homes, business premises and facilities.
Overall Economic Impact	+	This objective will have a positive impact for the local economy by prioritising the re-provision of jobs and business premises.

EAP strategic objective	2. Securing excellent design	
Sustainability Objectives	Score	Comment

EAP strategic objective	2. <i>Securing excellent design</i>	
1. To promote the provision of a range of high quality and affordable housing to meet local needs	++	Securing excellent design will help to achieve high quality housing development.
2. To promote a healthy and safe community	++	High quality design and improvements to places and streets will help reduce fear of crime and opportunity for crime as well as encouraging active travel.
3. To ensure access to local shopping, community and leisure facilities.	++	High quality design should result in improved access to buildings, places and streets.
4. To tackle poverty and social exclusion	+	High quality design is used to improve the urban environment, including in deprived areas. This can be used, as part of other measures, to enhance the local environment and the function of an area, where needed.
5. To improve amenity by minimising the impacts associated with development.	+	Excellent design can help to ensure that buildings are better designed to mitigate against noise impacts.
6. To conserve and improve open space provision and increase access to and enhancement of open space.	++	Excellent design will improve access to and enhance existing open space.
7. To improve local air quality and limit exposure.	0+	There are no significant impacts here although high quality design measures such as greening roofs and walls could improve air quality over time.
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	0+	High quality design should incorporate energy efficiency, including through passive measures as well as sustainable technology.
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0+	Although not directly linked, high quality design should include consideration of water efficiency and flood risk.
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0+	Although not directly linked, high quality design could involve incorporating elements to enhance biodiversity (e.g. through green roofs, soft landscaping).

EAP strategic objective	2. <i>Securing excellent design</i>	
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	0+	There are no significant impacts here although high quality design can ensure sustainable travel is planned for.
12. To promote high quality and sustainable urban design.	++	The EAP objective is very similar to the sustainability objective with same aims.
13. To protect and enhance the historic environment	++	This objective will ensure that the heritage of the area is complemented.
14. To ensure new development makes efficient use of land, buildings and infrastructure.	++	High quality design will enable maximised densities while minimising detrimental effects of increasing densities.
15. To encourage and accommodate sustainable economic growth and employment opportunity.	++	Improving the design and appearance of the place will create a better, more attractive environment and this will help to attract people and business to the area. This could have a significant, positive impact in the Euston area given its Central London location and the current urban design issues that constrain its attractiveness.
16. To maximise the benefits of regeneration and development to promote sustainable communities.	++	Improving the quality of the physical environment could help regeneration by providing a more attractive environment both for existing and new residents and businesses.
Overall Social impact	++	Well-designed places and developments will greatly enhance the urban environment, improve accessibility, create more pleasant and safe environments and add to people's quality of life.
Overall Environmental Impact	++	Excellent design plays an important role in creating a pleasant local environment, addressing environmental challenges including climate change, sustainable travel and energy efficiency; flooding; and air quality.
Overall Economic Impact	++	Sustainable design and attractive places and streets help create a more appealing urban environment, helping to create vibrant places helping to attract business, visitors and investment. This is particularly important in the Euston area, where its competitive location is currently compromised by urban design shortcomings.

EAP strategic objective	3. Making the best use of new space above and around the station and tracks and opportunities for regeneration in the wider area	
Sustainability Objectives	Score	Comment
1. To promote the provision of a range of high quality and affordable housing to meet local needs	++	Maximising opportunities above the station and tracks and wider regeneration could maximise the potential for new housing, making an important contribution to housing delivery in Camden and London.
2. To promote a healthy and safe community	++	The blank facades of the station, facing Eversholt Street and Cardington Street have created a negative environment and reduced overlooking and therefore the safety on the streets. By maximising opportunities for new uses above the station and tracks, this will enable more active frontages across the site.
3. To ensure access to local shopping, community and leisure facilities.	++	New uses above the station and more widely could enhance the availability of shops, facilities and open space through additional provision.
4. To tackle poverty and social exclusion	++	The provision of new uses above the station could help to tackle poverty and social exclusion by providing facilities and employment opportunities for local people.
5. To improve amenity by minimising the impacts associated with development.	++	Development above the station and, in particular over the tracks, could remove above-surface noise generated by both existing train services and new high speed trains. This would generate significant benefits for surrounding communities in terms of improving amenity and mitigating the potential impacts of HS2.
6. To conserve and improve open space provision and increase access to and enhancement of open space.	+	Open space provision must be maximised as part of new development.
7. To improve local air quality and limit exposure.	+	New development above the station and tracks and more widely could help to address air quality issues by integrating green space as part of development that could help to mitigate air pollution.
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	+	Policies will ensure that development is energy and resource efficient and to minimise waste production.

EAP strategic objective	3. Making the best use of new space above and around the station and tracks and opportunities for regeneration in the wider area	
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	+ -	Mixed use development including open space would provide the opportunity to enable growth in an area whilst also enabling measures to address existing surface water flooding issues in the area that have been identified at the local level. New development above the station could provide greater potential to address flood risk issues in the Euston area.
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	+	Provision of a mix of uses including open space (and, potentially, green roofs) could enable the provision of additional habitat, thus enhancing biodiversity in the area.
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	+	The station site and most of the wider Euston area has excellent public transport links. A mix of uses above the station would ensure that growth can take place in a location that does not necessitate use of the private car.
12. To promote high quality and sustainable urban design.	+	The EAP objective promotes comprehensive development of the area.
13. To protect and enhance the historic environment	0	There is no significant implications for protecting the historic environment.
14. To ensure new development makes efficient use of land, buildings and infrastructure.	++	Provision of a mix of uses above the station and tracks would make significantly more efficient use of land and infrastructure than the current station shed arrangement with open track area behind. Similarly, development in the wider area could allow more effective use to be made of currently under-utilised land.
15. To encourage and accommodate sustainable economic growth and employment opportunity.	+ -	New uses above the station site in particular could provide significant opportunities for economic growth and employment. Consideration would need to be given to ensuring that new uses do not negative affect surrounding businesses/employment opportunities.
16. To maximise the benefits of regeneration and development to promote sustainable communities.	++	Provision of a range of new uses above the station and more widely would maximise the benefits of regeneration by providing a range of uses to meet needs and generate growth, as well as contributing to a more active street
Overall Social impact	++	This objective could deliver significant benefits through wider regeneration, enabling the provision of housing, community facilities and job opportunities
Overall Environmental Impact	++	The site above the station and the area more widely is a sustainable location for mixed use development due to excellent public transport,

EAP strategic objective	3. Making the best use of new space above and around the station and tracks and opportunities for regeneration in the wider area	
		walking and cycling connections. The provision of new development could also deliver a significantly improved local environment, with the potential to mitigate flooding and air quality issues (subject to detailed policy approach). Also offers the potential to deliver energy and resource efficiencies.
Overall Economic Impact	++	Could deliver economic growth in a competitive Central London location, generating significant investment and providing a substantial number of new jobs. The more detailed policy approach in the EAP considers the impact of economic growth on the local area both in terms of the impacts on existing businesses/ character and enabling local people to take advantage of employment opportunities.

EAP strategic objective	4. New streets and enhanced routes	
Sustainability Objectives	Score	Comment
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0	No relationship. Housing provision is addressed by other objectives and existing policies.
2. To promote a healthy and safe community	++	New connections across the station and tracks would significantly improve connections between Somers Town and Regent's Park estate, enhancing accessibility to facilities; promoting walking and cycling by providing new direct links; and providing the opportunity to connect two communities that have been separated by the current railway line. The design of streets and the extent of overlooking are very important to safety, and the perception of safety. Detailed policies in the EAP seek to ensure that streets have sufficient overlooking and active frontages where appropriate in order to address this.
3. To ensure access to local shopping, community and leisure facilities.	++	This objective would deliver significant improvements in access to shops and facilities by providing significantly enhanced connections. The provision of new streets could also allow the provision of new uses along street frontages, including shops, services and facilities.

EAP strategic objective	4. New streets and enhanced routes	
4. To tackle poverty and social exclusion	++	The current station site and tracks restrict movement and creates a poor local environment. The provision of new streets above the station and tracks would allow greater connections to opportunities as well as improving the environment, with new connections and public realm improvements potentially attracting significant additional investment in the area.
5. To improve amenity by minimising the impacts associated with development.	0	There are no significant implications. New streets could generate noise impacts through increased traffic.
6. To conserve and improve open space provision and increase access to and enhancement of open space.	++	This objective would deliver significant improvements in access to open space by providing significantly enhanced connections.
7. To improve local air quality and limit exposure.	+ -	Provision of new streets could generate additional capacity for vehicle movements, which could lead to negative impacts in relation to air quality. Detailed policy approach seeks to manage the character and role of new streets to address this through seeking green routes through the provision of new trees and/ or other planting which could have a positive impact on air quality in the area.
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	+ -	The green streets will improve accessibility but could also mitigate poor air quality.
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0+	There are few implications however green infrastructure could enable improved drainage and reduce surface water flood risk.
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0+	A detailed policy approach should address the potential for new streets to enhance habitat/ biodiversity interest through the provision of street trees.
11. To reduce reliance on private transport modes,	+	There are significant enhancements to walking and cycling and active travel through the provision of more

EAP strategic objective	4. New streets and enhanced routes	
promote sustainable travel and enhance permeable access within the local area		direct routes which could lead to reduced need for private car use.
12. To promote high quality and sustainable urban design.	++	The provision of new streets could transport the public realm and provide the framework for a significantly improved streetscape around the station and tracks.
13. To protect and enhance the historic environment	0	There are no significant implications for the historic environment.
14. To ensure new development makes efficient use of land, buildings and infrastructure.	++	This would allow efficient use of land by providing the framework for the delivery of buildings as part of a new urban realm.
15. To encourage and accommodate sustainable economic growth and employment opportunity.	++	<p>The provision of new streets could help to generate additional investment by transforming the local environment and local connectivity, thus making the area more attractive. The potential for local people to access employment (and other) opportunities would also be enhanced.</p> <p>New streets would also provide the potential location for new high quality employment uses as part of a vibrant mix of uses.</p>
16. To maximise the benefits of regeneration and development to promote sustainable communities.	++	Improved connections and local environment could deliver improvements for the local, access to opportunities and increased investment.
Overall Social impact	++	This objective could deliver significant positive benefits through improved links and connections to local jobs, shops, facilities and open space. This
Overall Environmental Impact	+	Positive environmental impacts include a significantly enhanced public realm; improved walking and cycling; and making more efficient use of land.
Overall Economic Impact	++	Strongly positive economic impacts would be generated by enhancing access to economic opportunities, generating significantly increased investment through creating a much more attractive environment; and providing an urban framework for the provision of economic uses, as part of a mix of uses.

EAP strategic objective	5. <i>Boosting the local, wider London and national economy by reinforcing existing economic knowledge, cultural and community assets and businesses while also facilitating new growth and positive change that supports the objectives of the Knowledge Quarter inclusive innovation objectives</i>	
Sustainability Objectives	Score	Comment
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0	This objective is about creating a high quality transport interchange, providing jobs and training. Housing is addressed by other objectives.
2. To promote a healthy and safe community	0	This is addressed by other strategic objectives.
3. To ensure access to local shopping, community and leisure facilities.	++	The provision of new businesses and shops could provide additional amenities for local people.
4. To tackle poverty and social exclusion	++	The provision of new jobs and business sectors, with a focus on new job and training opportunities for local people could provide significant benefits in helping to tackle poverty and social exclusion.
5. To improve amenity by minimising the impacts associated with development.	0	There are no significant implications. This is addressed in other objectives.
6. To conserve and improve open space provision and increase access to and enhancement of open space.	0	There are no significant implications. This is addressed in other objectives.
7. To improve local air quality and limit exposure.	0	There are no significant implications. This is addressed in other objectives.
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing	0	There are no significant implications. This is addressed in other objectives.

EAP strategic objective	<i>5. Boosting the local, wider London and national economy by reinforcing existing economic knowledge, cultural and community assets and businesses while also facilitating new growth and positive change that supports the objectives of the Knowledge Quarter inclusive innovation objectives</i>	
waste requiring final disposal.		
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	There are no significant implications. This is addressed in other objectives.
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0	There are no significant implications. This is addressed in other objectives.
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	0	There are no significant implications. This is addressed in other objectives.
12. To promote high quality and sustainable urban design.	0+	There is no significant relationship. High quality design can help to generate investment and growth through the creation of a more attractive urban environment.
13. To protect and enhance the historic environment	0	There is no significant relationship or implications.
14. To ensure new development makes efficient use of land, buildings and infrastructure.	0+	No significant relationship. Promoting the provision of retail and business space in the Euston area would help to allow more effective use of a central/ inner London area with excellent transport links.
15. To encourage and accommodate sustainable economic growth and employment opportunity.	++	This objective seeks to ensure the Euston makes the most of its significant potential to generate economic growth, building on existing strengths in the area. It provides the potential to deliver strategic economic benefits through a focus on nationally important economic clusters that surround the Euston area.
16. To maximise the benefits of regeneration and development to promote sustainable communities.	++	This objective would maximise the benefits of regeneration by seeking to encourage economic growth whilst seeking to ensure that local people can be involved through job and training opportunities.

EAP strategic objective	5. <i>Boosting the local, wider London and national economy by reinforcing existing economic knowledge, cultural and community assets and businesses while also facilitating new growth and positive change that supports the objectives of the Knowledge Quarter inclusive innovation objectives</i>	
Overall Social impact	+	This objective could deliver positive benefits through improved access to employment opportunities and new local jobs.
Overall Environmental Impact	0	Very little environmental impacts
Overall Economic Impact	++	This is likely to have a strongly positive economic impact, by seeking to address local economic issues and opportunities, whilst also focusing on the potential to take advantage of surrounding Knowledge Quarter: this could have significant benefits for London and, possibly, nationally.

EAP strategic objective	6. <i>Creating sustainable development:</i>	
Sustainability Objectives	Score	Comment
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0	There are no significant implications. This is addressed in other objectives.
2. To promote a healthy and safe community	0+	Well-designed, sustainable homes are more energy efficient, reducing bills, which can be of particular benefit to the health of some residents. Sustainably designed homes can also help to provide a healthier environment through the delivery of less polluting development in terms of noise and air pollution.
3. To ensure access to local shopping, community and leisure facilities.	0	There are no significant implications. This is addressed in other objectives.
4. To tackle poverty and social exclusion	0+	Well-designed, energy efficient homes could reduce the cost of living for those people with low incomes.
5. To improve amenity by minimising the impacts	0	There are no significant implications. This is addressed in other objectives.

EAP strategic objective	6. Creating sustainable development:	
associated with development.		
6. To conserve and improve open space provision and increase access to and enhancement of open space.	+	Enhancing the quality and sustainability of the local environment will create positive impacts for open space network.
7. To improve local air quality and limit exposure.	+	Improved local environment will contribute to improvements in air quality.
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	++	Significant benefits through promoting sustainable and green design and construction and resource and energy efficiency.
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	+	There are likely to be positive effects as a result of sustainable, carbon free development with high environmental standards.
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	+/-	Environmental sustainability considerations can include habitats and biodiversity. Due to the loss of existing habitats and biodiversity, this objective will increase biodiversity in the Euston area.
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	0	Sustainable travel is covered by other objectives.
12. To promote high quality and sustainable urban design.	++	Environmental sustainability should form part of high-quality sustainable design.
13. To protect and enhance the historic environment	0	There are no significant implications. This is addressed in other objectives.

EAP strategic objective	6. <i>Creating sustainable development:</i>	
14. To ensure new development makes efficient use of land, buildings and infrastructure.	++	There are significant benefits through promoting sustainable design and construction.
15. To encourage and accommodate sustainable economic growth and employment opportunity.	0	There are no significant implications. This is addressed in other objectives.
16. To maximise the benefits of regeneration and development to promote sustainable communities.	+	The promotion of sustainable communities through a carbon free development will bring benefits.
Overall Social impact	+	Benefits in terms of health and helping the vulnerable through the provision of more energy efficient homes and a more reliable and efficient long-term energy provision through the promotion of local energy networks. Emphasis on the quality of the local environment could also bring benefits in terms of air quality.
Overall Environmental Impact	++	There are strong environmental benefits, including in relation to reducing carbon emissions, with reference to quality and sustainability of the local environment linking to detailed policies around flood risk, air quality and biodiversity.
Overall Economic Impact	0	There is overall, a neutral economic impact. Other objectives address economic issues.

EAP strategic objective	7. <i>Improving the environment along Euston Road</i>	
Sustainability Objectives	Score	Comment
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0	There are no significant relationship or implications.

EAP strategic objective	7. Improving the environment along Euston Road	
2. To promote a healthy and safe community	+	Addressing the environment along Euston Road could help to enhance health by addressing existing air quality issues where possible. Improved connections across Euston Road could also enhance community access to University College London facilities to the south.
3. To ensure access to local shopping, community and leisure facilities.	++	Addressing the barrier effect of Euston Road could bring significant benefits by enhancing access north and south of Euston road to shops and facilities.
4. To tackle poverty and social exclusion	+	Addressing the barrier effect of Euston Road could help to better connect the deprived communities of Regent's Park and Somers Town with Central London.
5. To improve amenity by minimising the impacts associated with development.	0+	Euston Road is an area of excessive noise and pollution. Improving the pedestrian and cyclist experience could help address this.
6. To conserve and improve open space provision and increase access to and enhancement of open space.	+	Addressing the barrier effect of Euston Road could bring significant benefits by enhancing access north and south of Euston road to open spaces.
7. To improve local air quality and limit exposure.	++	<p>Air quality is a major issue along Euston Road, and seeking to improve the pedestrian and cyclist environment could help to address this.</p> <p>It should be noted that wider measures to address air quality on Euston Road would also be needed as it relates to traffic travelling through the area. Providing a green artery should assist in improving the air quality.</p>
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	0	There are no significant relationship or implications.
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0+	The provision of a green artery will assist with drainage particularly where there are flooding issues on Euston Road.

EAP strategic objective	7. Improving the environment along Euston Road	
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0+	This is unlikely to have a significant impact on this, although the greening of the environment, could provide enhanced habitats and biodiversity.
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	++	An emphasis on improving the environment for pedestrians and cyclists could help to promote these more active travel and more sustainable modes as an alternative to the car.
12. To promote high quality and sustainable urban design.	++	This objective aims provide a significantly improved public realm along Euston Road, which would create a setting that could support an improved relationship between new buildings and spaces.
13. To protect and enhance the historic environment	0	There are no significant relationship or implications for this objective.
14. To ensure new development makes efficient use of land, buildings and infrastructure.	0+	There is no significant relationship however improvements to north-south connections along Euston Road could help to support additional development in the area by enhancing connectivity.
15. To encourage and accommodate sustainable economic growth and employment opportunity.	+ -	By addressing the barrier effect and poor public realm created by Euston Road, there is the potential to transform the public realm and significantly change the image of Euston, potentially allowing the area to attract more investment and jobs.
16. To maximise the benefits of regeneration and development to promote sustainable communities.	++	Improved connections and an improved public realm along Euston Road could help to attract investment and jobs to the area as well as creating a significantly improved local environment and improving southward connections for deprived communities.
Overall Social impact	+	There would be positive social impacts by improving accessibility and improving connections for deprived communities at Regent's Park Estate and Somers Town with Central London to the South.
Overall Environmental Impact	++	There would be a strong positive environmental impact through significant enhancements to the public realm and promotion of walking and cycling, as well as the potential to address air quality issues where possible.
Overall Economic Impact	++	There would be a strong positive economic impact by enhancing the image, attractiveness and function of the area, thus potentially attracting investment and jobs. This could be further enhanced by measures to address the bus station

EAP strategic objective	7. <i>Improving the environment along Euston Road</i>	
		<p>arrangement, which also severs the station area with Euston Road and Central London beyond.</p> <p>Care would need to be taken to ensure that measures to enhance pedestrian and cycling links across Euston Road would not significantly undermine the movement of people and goods east-west along Euston Road, as this could have an indirect negative economic impact.</p>

EAP strategic objective	8. <i>Promoting sustainable and active travel</i>	
Sustainability Objectives	Score	Comment
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0	There is no direct relationship.
2. To promote a healthy and safe community	++	Promoting walking and cycling would help to promote healthier lifestyles as well as enhancing access to facilities.
3. To ensure access to local shopping, community and leisure facilities.	++	Promoting walking and cycling, and improvements to streets and interchange facilities would have significant benefits for access to shops and facilities.
4. To tackle poverty and social exclusion	++	Improvements to walking and cycling routes would help improve accessibility for deprived communities in the Euston area.
5. To improve amenity by minimising the impacts associated with development.	+	Traffic can have negative impacts on amenity, particularly in relation to noise pollution. The promotion of alternatives to private vehicle use can help to address this.
6. To conserve and improve open space provision and increase access to and enhancement of open space.	+	Promoting sustainable active travel, and improvements to streets and interchange facilities would have significant benefits for access to open space.
7. To improve local air quality and limit exposure.	++	The promotion of sustainable modes of travel provides alternatives to the use of private vehicles. This can help to reduce air pollution by fostering a reduction in traffic emissions.

EAP strategic objective	8. Promoting sustainable and active travel	
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	+	Sustainable travel provides a more energy efficient means of travel than private car use and assists in the mitigation of the effects of climate change.
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	There are no significant implications.
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0	There are no significant implications.
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	++	Promotion of sustainable travel options plays a fundamental role in reducing reliance on private transport modes.
12. To promote high quality and sustainable urban design.	0+	There is no direct relationship however the promotion of sustainable travel can help to provide an alternative to private vehicle use, thus helping to reduce the effect of traffic on the built environment.
13. To protect and enhance the historic environment	0	There are no significant implications.
14. To ensure new development makes efficient use of land, buildings and infrastructure.	+	Promotion of sustainable travel options can help to ensure efficient use of land by ensuing development is supported by appropriate transport infrastructure.
15. To encourage and accommodate sustainable economic growth and employment opportunity.	+	Enhancements to walking and cycling links to and through the area would be likely to enhance the function and attractiveness of the area, potentially helping to attract investment. It would also help to support economic growth by ensuring that the area is accessible by a range of efficient transport means.
16. To maximise the benefits of regeneration	+	Improvements to sustainable travel would enhance the ability of local communities to employment opportunities

EAP strategic objective	8. Promoting sustainable and active travel	
and development to promote sustainable communities.		as well as enhancing the character and function of the Euston area.
Overall Social impact	++	The promotion of sustainable travel is likely to have strongly positive social benefits by helping to promote healthy lifestyles, improving access to facilities, and wider accessibility, including to employment opportunities.
Overall Environmental Impact	++	This objective would also be likely to have strongly positive environmental effects by reducing emissions, generating positive effects both in terms of climate change mitigation and air quality. It would also have positive effects by reducing noise and supporting efficient use of land through the provision of appropriate supporting infrastructure.
Overall Economic Impact	+	The promotion of sustainable travel would have a positive economic impact by improving accessibility to employment/ economic activities and helping to create a more attractive, less traffic-dominated environment.

EAP strategic objective	9. Enhancing existing public transport:	
Sustainability Objectives	Score	Comment
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0+	Whilst there is no significant relationship between these two objectives, the enhancement of existing public transport provision could help to support additional development, including affordable housing provision.
2. To promote a healthy and safe community	+	Enhancements to existing transport services could contribute to safer communities by addressing existing issues relating to the current poor design of the station with blank station flanks and poorly configured bus interchange. Promotion of public transport rather than private vehicle usage encourages active travel and healthier lives.
3. To ensure access to local shopping, community and leisure facilities.	+	Improvements to existing public transport infrastructure could help to improve access to shops and community and leisure facilities by increasing the capacity and/ or frequency of transport services.
4. To tackle poverty and social exclusion	+	Improved public transport infrastructure could help to address poverty and exclusion by enhancing access to employment opportunities and facilities.

EAP strategic objective	9. <i>Enhancing existing public transport:</i>	
5. To improve amenity by minimising the impacts associated with development.	+-	Enhancing existing public transport could help to improve amenity and reduce noise by enabling a reduction in traffic, and therefore traffic noise. However, public transport services, for example buses, can also create noise, which could impact on amenity if the level of service is increased.
6. To conserve and improve open space provision and increase access to and enhancement of open space.	+	Improvements to existing public transport infrastructure could help to improve access to open space by increasing the capacity and/ or frequency of transport services.
7. To improve local air quality and limit exposure.	+-	Reduced private vehicle usage and enhancement of existing public transport could help to improve air quality due to a reduction in traffic and emissions.
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	+	Public transport is a more energy efficient means of travel than the use of private vehicles, and enhanced services would help to increase the use of more efficient transport modes. In addition, waste heat from public transport services (e.g. the London Underground) could be re-used to provide energy to heat surrounding buildings.
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	This is addressed by other strategic objectives.
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0	This is addressed by other strategic objectives.
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	++	The upgrade and enhancement of existing public transport plays an important role in reducing the reliance on private transport /by providing an alternative means of travel.
12. To promote high quality and sustainable urban design.	+	Improved existing public transport infrastructure could include the redevelopment, reconfiguration or other alterations to existing buildings and facilities to create a

EAP strategic objective	9. Enhancing existing public transport:	
		more attractive built environment, including a more active, connected and legible public realm.
13. To protect and enhance the historic environment	0	This are no significant implications for this sustainability objective.
14. To ensure new development makes efficient use of land, buildings and infrastructure.	++	The enhancement of existing public transport is crucial in enabling the maximum appropriate use of land and buildings. New development needs to be supported by improvements to transport infrastructure.
15. To encourage and accommodate sustainable economic growth and employment opportunity.	++	Enhancement of public transport capacity would be likely to play an important role in enabling economic growth enhancing the capacity of frequency of services, thus supporting the development of additional business and other economic-related floorspace and making Euston a more attractive destination for investment.
16. To maximise the benefits of regeneration and development to promote sustainable communities.	++	Improved public transport capacity plays an important role in enabling regeneration by supporting the delivery of additional homes, jobs, community facilities and other uses, as well as enhancing connectivity to employment and other opportunities.
Overall Social impact	+	Improved existing public transport would be likely to enhance access to facilities and employment opportunities, as well as supporting the delivery of additional uses that would be socially beneficial, for example new homes and community facilities.
Overall Environmental Impact	++	Enhancing existing public transport would be likely to have a strongly positive overall environmental impact by providing an alternative to private vehicle use. It would also enable development that makes more efficient use of land by supporting higher density development (where appropriate).
Overall Economic Impact	++	Enhanced public transport would play an important role in enabling economic growth and regeneration by delivering the additional infrastructure required to support additional businesses and other uses.

Social impacts

7.3 As with the previous Sustainability Appraisal for the 2015 EAP, the strategic objectives will have considerable positive social impacts. There are several objectives that aim to address key social issues including

- Further mitigating the loss of any homes, jobs and open space and facilities that would result from HS2;

- addressing the negative social impact of the existing station site and seeking opportunities to provide new homes, jobs, community and other facilities and open spaces (above the station site);
- seeking to ensure that local people are included in employment opportunities, as well as potentially providing new shops that could be accessed by local people;
- improving connectivity and enhanced permeability by the new streets through and around the station and tracks would improve the lives of local people and their access to local facilities.
- The promotion of active and sustainable travel will improve the health and wellbeing of local people.

Environmental impacts

7.4 The draft objectives of the SA will contribute significantly to achieving the environmental aims of the sustainability framework. Direct positive impacts include:

- Seeking the re-provision of open spaces lost as a result of HS2 and a comprehensive strategy to meet the needs of the development;
- Making better use of land above the station would make efficient use of land and promote mixed-use development in an area of excellent public transport accessibility,
- New streets through and around the station and an improved environment along Euston Road would help to promote walking and cycling, and deliver an improved local environment
- Specific objectives to promote sustainable and active travel help to promote alternatives to private transport. Specific objectives to improve sustainability, including energy efficient and carbon free development, increasing biodiversity, green infrastructure and flood mitigation measures to improve air quality and climate resilience.
- Economic growth should also improve sustainability outcomes such as by providing funding for green infrastructure, technology and research and benefits that include improved air quality and biodiversity, resilience to climate change and the development of a circular economy.
-

Economic impacts

7.5 The draft strategic objectives should have very positive economic impacts both directly and indirectly. There are several objectives that will specifically contribute to achieving economic sustainability:

- Providing jobs and boosting the local economy would be likely to have a strong positive economic impacts, by seeking to address local economic issues and opportunities, whilst also focusing on the potential to take advantage of surrounding knowledge/creative clusters: this could have significant benefits for London and, possibly, nationally. The thousands of jobs created as a result of development in the Euston area could benefit local communities and residents, by delivering significant social value outcomes.
- Making best use of space above and around the station and tracks could bring major economic benefits by promoting economic growth in a competitive Central London location, generating significant investment and providing a substantial number of new jobs.

- The promotion of sustainable travel, enhancing existing and planning for future public transport would have positive economic impacts by improving accessibility to employment/ economic activities, delivering the additional infrastructure required to support additional businesses and other uses, and helping to create a more attractive, less traffic-dominated environment.
-

Conclusion

- 7.6 The Euston Area Plan updated objectives (and their implementation through detailed policies) are considered to be successful in seeking to achieve sustainable development, and subsequently provide a positive framework for the detailed strategic Principles and Development Principles in the Euston Area Plan.
- 7.7 It is important that the policies contained within the Euston Area Plan update help to implement the objectives, building on their success in seeking to achieve sustainable development. Appraisals of the strategic options considered in the development of the EAP and the Strategic Principles and Development Principles it contains within the EAP itself, are set out below.

8. APPRAISAL OF THE EUSTON AREA PLAN STRATEGIC OPTIONS

- 8.1 In addition to the Strategic Objectives, a series of options have been identified to deal with the sustainability issues faced at Euston. These options are set out below. The matrix and accompanying commentary set out the Sustainability Appraisal of these options and provides a justification for the appraisal.

Key: Attributing effects	
++	Likely large positive impact
+	Likely positive impact
+-	Likely positive and negative impacts
0	Uncertain impact or no relationship
-	Likely negative impact
--	Likely large negative impact

Issue 1. Approach to level of growth

Option 1a) Retain growth scenario included in adopted Local Plan and 2015 EAP

Option 1b) Reduce indicative capacity shown in the EAP to reflect site constraints and emerging station designs/ principles

Sustainability Objectives		Options	1a	1b
1	To promote the provision of a range of high quality and affordable housing to meet local needs		+	+-

2	To promote a healthy and safe community	0	0
3	To ensure access to local shopping, community and leisure facilities.	+	+-
4	To tackle poverty and social exclusion	+	+
5	To improve amenity by minimising the impacts associated with development.	+-	+-
6	To conserve and improve open space provision and increase access to and enhancement of open space.	+-	+-
7	To improve local air quality and limit exposure.	+-	+-
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	+-	+-
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	+-	+-
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	+-	+-
11	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	++	++
12	To promote high quality and sustainable urban design.	++	++
13	To protect and enhance the historic environment	+-	+-
14	To ensure new development makes efficient use of land, buildings and infrastructure.	+	+
15	To encourage and accommodate sustainable economic growth and employment opportunity.	++	+
16	To maximise the benefits of regeneration and development to promote sustainable communities.	+	+

Commentary

Issue 1: Approach to level of growth

Option 1a) and 1 b)

- 8.2 Euston is designated as a growth area in the Camden Local Plan 2017 and London Plan. The 2015 Euston Area Plan policies identified the potential for between 2,800 and 3,800 homes and between 180,000 and 280,000sqm of employment floorspace. The level of growth in the EAP provides for the Euston area an

opportunity to address existing issues in terms of deprivation, education and unemployment around Euston.

- 8.3 The growth scenario in the 2015 EAP was based on the information available at the time, and assumed that the majority of the tracks and stations would be enabled for development. Further work and significant cost and time pressures have indicated that the extent of land enabled for development will be significantly reduced.
- 8.4 There are various challenges and site constraints with developing over railway infrastructure that could limit development over and around Euston station. It is understood that as a result of cost savings and a changes to the station ventilation strategy which requires additional voids, the extent of decking over the railway infrastructure to enable development will be significantly reduced, which in turn reduces the amount of growth that could be possible in the station and Cuttings areas which account for a significant proportion of the growth identified in the EAP.
- 8.5 Ultimately, the amount of development that is delivered in these locations will be determined by the station designs and the extent of enabling works. As there are no confirmed station designs (or costs) it is difficult to say exactly where development can be delivered. Work to consider options for development has been based on the information available at the time of writing and as a result the amount of land assumed to be enabled for development has reduced significantly, especially in the cuttings area. This is as a result of instructions from Central Government to HS2 to reduce the cost and complexity of HS2 delivery.
- 8.6 Opportunities for additional development within the EAP area were explored as part of the options development and are included in this assessment, While a reduced growth scenario as outlined in option 1b) may play a lesser role in enabling the delivery of much needed housing, in deliverability terms it would appear to be more realistic - as the assessment shows, it was not possible to identify significant growth opportunities within the existing constraints and it is therefore not possible to retain the level of growth included in the 2015 EAP.
- 8.7 It is recognised that there are significant benefits to facilitating growth not just related to the station, but in the wider area, particularly in terms of opportunities to achieve regeneration objectives in surrounding estates and wider environmental improvements. Opportunities for additional growth were explored as part of the design-led options development and in some locations additional development capacity was identified and this is included in the growth identified but it has not been possible at this stage to identify capacity for the level of growth indicated in the 2015 EAP.
- 8.8 It is worth noting that the government's 10 Year Infrastructure Strategy underlines plans to establish a Euston Delivery Company to oversee the private finance and proposals for the station, which will work with the London Borough of Camden and the Greater London Authority to "grow a commercial and life sciences core around the station; and deliver affordable housing and regeneration in the surrounding area".

- 8.9 The government has also formed the Euston Housing Delivery Group - a partnership between Camden, MHCLG and GLA - with a focus on identifying a pathway towards delivering much needed additional homes in the Euston Area. Should it be possible to identify in partnership with local communities, locations for additional housing, this assessment of the Updates to the EAP and the original assessment of the EAP demonstrate the benefits of delivering additional homes and notes that significant schemes would need to carry out screening of their environmental impacts.
- 8.10 The Council is working with the MHCLG led housing delivery group to identify whether there is scope and funding for additional housing delivery in the Euston area - further work with local communities is needed to identify opportunities and the EAP highlights that the Regent's Park, Churchway and Ampthill estates are all areas where new housing and or retrofit of existing properties should be explored and there is further work to be done to establish any opportunities, including working with local communities. Reference to this is included in the Plan as is reference to the opportunity to release further growth through station designs and areas for enablement.

Issue 1 Conclusion

- 8.11 In conclusion, option 1b is considered to be the most appropriate option. Site constraints associated with developing above or adjacent to significant transport infrastructure mean that only parts of the site will be enabled and the amount of growth possible over and adjacent to the stations is restricted. The EAP should highlight that further opportunities for housing will be explored, in order to maximise the supply of much needed housing in line with Central Government ambitions.

Issue 2: Approach to land use taking into account reduction in land available for development in the Euston Stations Masterplan area

- Option 2a) Retain approach to land uses as shown in EAP 2015, with employment-led mixed-use development focussed in the station area and residential development focussed in the Cutting (and elsewhere in the EAP area).*
- Option 2b) Proportionally distribute land uses across the station masterplan area.*

Sustainability Objectives		Options	2a	2b
1	To promote the provision of a range of high-quality and affordable housing to meet local needs		+	+
2	To promote a healthy and safe community		+	+
3	To ensure access to local shopping, community and leisure facilities.		+	+-
4	To tackle poverty and social exclusion		+	+
5	To improve amenity by minimising the impacts associated with development.		+-	+-
6	To conserve and improve open space provision and increase access to and enhancement of open space.		+-	+-
7	To improve local air quality and limit exposure.		+-	+-
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+-	+-
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		+-	+-
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		+-	+-
11	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		+	+
12	To promote high quality and sustainable urban design.		+	+
13	To protect and enhance the historic environment		0	0
14	To ensure new development makes efficient use of land, buildings and infrastructure.		+	+
15	To encourage and accommodate sustainable economic growth and employment opportunity.		+	++
16	To maximise the benefits of regeneration and development to promote sustainable communities.		+	+

Commentary

Option 2a) and 2b)

- 8.12 The EAP 2015 identified that a mix of uses including a significant amount of residential floorspace should be provided. The Plan identifies that between 180,000 sqm and approximately 280,000 sqm of new employment/economic

floorspace, providing between 7,700 and approximately 14,100 jobs could be delivered encouraging knowledge based, research and creative uses to strengthen Euston's existing role as a knowledge and research hub. This was in addition to between 2,800 and approximately 3,800 additional homes along and 20,000sqm of retail floorspace focused around the station as well as education, health and other community facilities to support development.

- 8.13 As explained above, the amount of growth in the EAP update has reduced to reflect the reduction in enabled land, particularly in the Cuttings areas where a significant amount of the residential growth was identified in the 2015 EAP. It is therefore necessary to assess the options for where land uses should be located as a result in the reduced overall development capacity.
- 8.14 Based on the information available, and emerging work on spatial arrangements for the station areas, it is understood that there could still be significant development adjacent to the HS2 station (for assessment of options please see below) and over and adjacent to the Network Rail station, whereas development in the Cutting area, has significantly reduced. The adopted EAP focuses commercial uses in the station area and residential uses in the Cutting, following this approach, results in an increase in employment uses and a reduction in residential.
- 8.15 Euston Station is within the Central Activities Zone (CAZ), as designated in the London Plan. Euston lies at the heart of the Knowledge Quarter inclusive innovation district, as a unique cluster of academic, cultural, research, and scientific organisations, which have been attracted to the area by the excellent transportation links, highly skilled workforce, high-quality office and lab spaces, concentration of knowledge economy organisations, and outstanding retail, art and leisure offer.
- 8.16 The significant development potential is a once in a generation opportunity to secure transformational regeneration for the area, and realise the economic potential of the area, maximising the benefits from new development and new jobs for the local community. Policies which seek to secure local benefits, social value and inclusive growth are included in the Plan. Continuing to focus commercial-led mixed-use development over the station could help to ensure that the development is viable, as it is recognised that the cost and complexity of maximising housing over the station site could be prohibitive and such development could be unviable. This option could also play a lesser role in enabling an optimum balance of uses between the Euston Station and Tracks site and the North Euston Cutting, by delivering fewer homes to balance with employment led mixed uses on the station/tracks site.
- 8.17 However, the increased value from the commercial development should help to deliver residential development elsewhere in Euston Stations masterplan area (including the Cuttings). When there is more certainty about designs and costs, opportunities to deliver housing along part of Eversholt St as part of the mixed use development should be explored and delivered if viable, given the advantages an element of residential development could bring to this area, including helping to address the relationship and transition to nearby residential areas, bringing activity to the area at different times of the day and delivering much needed housing.

- 8.18 In both options, there are opportunities to provide residential development in the Cutting area, where all the identified sites fall within the same land ownership as the station area, policy links the sites, recognising the greater level of commercial development that is capable of being achieved and the role that this has in enabling residential development elsewhere within the masterplan area. could be linked to the higher levels of commercial development to ensure viability.
- 8.19 The Council will continue to support the Knowledge Quarter and prioritise employment floorspace for the knowledge economy however the need for housing is considered to be a priority land use and this is recognised in the policies.
- 8.20 Option 2 b) could potentially better help to meet the need for housing, including affordable housing in the area with a particular need for affordable family housing and intermediate housing.. However, questions about its viability without a greater level of commercial development to support it remain. Although housing projections in the updated Euston Area Plan indicate lower delivery than that identified in the 2015 EAP, the London Plan and the Camden Local Plan reflecting more accurate capacities identified through masterplanning work as a result of additional site constraints, costs and viability issues, option 2a) is considered more deliverable.
- 8.21 As noted above, the cost and complexity of delivering housing over the station site could be prohibitive and such development could be unviable, resulting in a reduced overall level of development and less opportunities to realise the economic advantages of strengthening and supporting the Knowledge sector. It could also reduce the delivery of housing overall as there would be fewer opportunities to support the more challenging residential development in the Cutting area.
- 8.22 As noted in the assessment of Strategic Issue 1, The Council is working with the MHCLG led housing delivery group to identify whether there is scope and funding for additional housing delivery in the Euston This is referenced in the strategic policies and also in the places chapters where opportunities could be explored in order to realise the social and economic benefits that new housing would deliver, including addressing issues of over-crowding and providing new homes for those on waiting lists.

Issue 2 Conclusion

- 8.23 Although housing remains a priority land use for the Council, issues including viability and site constraints, may affect what it is possible to deliver over the station. Coupled with London Plan policies which prioritise commercial activities in the Central Activities zone (where the stations are located), recognising the unique opportunity provided by its location at the heart of the Knowledge Quarter and considering the role that optimising commercial development in this higher value location could play in supporting residential development elsewhere. Although at an early stage and based on unconfirmed designs and costs, the early stage viability assessment which has informed the plan, suggests that optimising commercial development over the station should help to deliver residential development in the Cutting where viability is more challenging. In addition sites unconstrained by station infrastructure are prioritised for housing. It is therefore, considered most appropriate to retain the approach to land uses as shown in EAP 2015 with priority for commercial uses over the station.

Issue 3: Approach to building heights

Option 3a) Retain building heights as shown in EAP 2015

Option 3b) Increase indicative height on sites within the London Viewing Management Framework (LVMF)

Option 3c) Increase indicative heights beyond LVMF, basing assessment on local conditions only

Sustainability Objectives		Options	3a	3b	3c
1	To promote the provision of a range of high quality and affordable housing to meet local needs		+	++	+
2	To promote a healthy and safe community		+-	+-	+-
3	To ensure access to local shopping, community and leisure facilities.		+	+	+
4	To tackle poverty and social exclusion		+	+	+
5	To improve amenity by minimising the impacts associated with development.		-	-	-
6	To conserve and improve open space provision and increase access to and enhancement of open space.		+-	+-	+-
7	To improve local air quality and limit exposure.		-	-	-
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		-	+-	+-
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		-	+-	+-
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		-	+-	+-
11	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		-	+	+
12	To promote high quality and sustainable urban design.		+	++	++
13	To protect and enhance the historic environment		+	-	--
14	To ensure new development makes efficient use of land, buildings and infrastructure.		+	++	++
15	To encourage and accommodate sustainable economic growth and employment opportunity.		+	++	++

Sustainability Objectives		Options	3a	3b	3c
1	To promote the provision of a range of high quality and affordable housing to meet local needs		+	++	+
2	To promote a healthy and safe community		+-	+-	+-
3	To ensure access to local shopping, community and leisure facilities.		+	+	+
4	To tackle poverty and social exclusion		+	+	+
5	To improve amenity by minimising the impacts associated with development.		-	-	-
6	To conserve and improve open space provision and increase access to and enhancement of open space.		+-	+-	+-
7	To improve local air quality and limit exposure.		-	-	-
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		-	+-	+-
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		-	+-	+-
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		-	+-	+-
16	To maximise the benefits of regeneration and development to promote sustainable communities.		+	++	++

Commentary - options 3a, 3b and 3c

Option 3a) – 3c

- 8.24 The EAP 2015 set out maximum heights that were appropriate for new development areas, based on an analysis of the surrounding built context and modelling of potential impacts on strategic views. The EAP 2015 considered the building heights, massing and scale in relation to the London View Management Framework and the protection of strategic views of buildings such as St. Paul's Cathedral and the Palace of Westminster and local views, such as those from Regent's Park. The building heights restricted development so that it would not encroach into the Protected vistas identified in the London View Management Framework (LVMF). It recognised that there were potential locations for tall buildings in the shadows of St Pauls Cathedral. The EAP 2015 did however recognise that there may be impacts on local heritage assets which would need to be addressed. Although station designs are still to be confirmed, it is understood that the amount of land enabled for development has decreased compared to 2015

and by keeping heights the same, it would yield a lower capacity of development. The approach taken in the review to undertake more detailed testing on where additional height could be accommodated within the protected views taking into account the historic environment in terms of local views, balances the need to accommodate additional development to enhance viability and deliverability of development and impacts should remain broadly similar to the EAP 2015.

- 8.25 All options include elements of tall buildings and it should be noted that the amenity impact of tall buildings could be significant for those living in close proximity in terms of sunlight and daylight and outlook for residential properties. Taller buildings could impact the setting, form, context and scale of neighbouring buildings. It is also recognised that tall buildings tend to use more energy and emit more carbon than lower rise equivalents.
- 8.26 All options would enable the efficient use of land, by proposing the positive use of new land alongside the new HS2 station and above the existing network rail station and areas of railway track, optimising potential for development. Option 3b and 3c could deliver similar benefits to 3a in making better use of under-utilised land and providing for more development and the associated benefits this brings. These options may also provide some benefits in terms of urban design and the delivery of open space, should it be possible to build taller buildings which accommodate more growth. However, option 3b may not make as effective use of land as option 3c by failing to maximise new homes, which are much needed in the borough.
- 8.27 Option 3b and 3c by increasing the height of development in the Euston area may enable additional homes and jobs to be delivered which would benefit local communities and potentially improve viability of development. The land to be enabled at Euston station has been reduced and by increasing building heights, this would increase development potential. Euston is however located in a sensitive location with the area and its surroundings being historically sensitive, with heritage assets including listed buildings, conservation areas, and registered parks and gardens nearby. Option 3c which considered increasing heights beyond the LVMF would have significant impacts on the skyline of London and could cause harm to heritage assets and not respond to the context of their locations.
- 8.28 Option 3b, through identifying locations for extra height which seeks to limit impacts on the LVMF and heritage assets could deliver on balance the best outcomes, noting that there could be a slight increase in impact on the setting of heritage assets in Regent's Park. However, other policies in the Development Plan seek to secure high quality, sensitively designed development which considers and mitigates these impacts.
- 8.29 The EAP Update Strategic Principle for Design seeks to ensure that new development responds to existing character and context, with the aim of promoting high quality design. The EAP also responds to the issue of building heights and tall buildings. It is well established through the Local Plan 2017 (and previous plans) that a large part of the Euston area is sensitive to the development of tall buildings as Viewing Corridors from the LVMF run through the centre of the EAP boundary. In response to London Plan Policy D9 (Tall buildings) the Council commissioned a Building Heights Study. This along with a design-led capacity assessment, informed by where it might be possible to enable land over the station and tracks, helped to identify sites where tall buildings may be an appropriate form of development and set out indicative

height ranges to guide future development, subject to compliance with other policies in the Plan.

- 8.30 Key insights from the study along with design led capacity studies informed the site allocation policies, which identify sites where tall buildings may be an appropriate form of development and set out indicative height ranges to guide future development, subject to compliance with other policies in the Plan.
- 8.31 The amenity impact of tall buildings could have an impact on those living in close proximity in terms of sunlight and daylight and outlook for residential properties.. It is also recognised that tall buildings tend to use more energy and emit more carbon than lower rise equivalents.
- 8.32 The following Site allocations that have been identified as being potentially suitable for tall buildings are:
- Euston Station
 - Royal Mail
 - The Place and Premier Inn
 - 250 Euston Road
 - Cutting at Park Village East
 - Granby Terrace Bridge/ Hampstead Road
 - Former Maria Fidelis School
 - Regents Park Estate North
 - Capital City College
 - Ampthill Estate Railway Edge

Issue 3 Conclusion

- 8.33 In terms of the above options meeting the case for taller buildings largely resides around the viability and the opportunity to secure more residential floorspace including affordable homes and employment space on the Euston campus site. That said, a compromise needs to be struck, allowing height in strategic locations could be considered should the proposal clearly demonstrate the improved environmental and social impact for the area – for example this could unlock the provision of additional open space at the ground plane etc. and the greater floorspace should help with the viability challenges presented by developing over transport infrastructure. Option 3b was considered on balance the preferred option.

Issue 4: Station Design, futureproofing and station expansion

- 8.34 In line with Government direction, work to construct the HS2 station at Euston was paused in March 2023 due to inflationary pressures and the need to find a more affordable design at Euston. The Government's Network North paper published in October 2023 set out the plans to reduce costs at Euston, including reducing the size of the HS2 station from ten to six platforms; removing the tunnel between Euston and Euston Square underground and the aspiration to establish a delivery corporation to create up to 10,000 homes at Euston and subsequent announcement of a Housing Delivery Group. . While there are currently no firm plans for Euston station design, or how finance will be raised, it is expected that future decisions in relation to these points may affect where and how development can take place, the capacities identified in the EAP are based on the best available information and include a

range in capacity to reflect different station scenarios, though it does not include a no HS2 station scenario. This is due to the Government confirming that HS2 will go to Euston in October 2023. The Government is yet to confirm how, or if, it intends to address futureproofing for potential expansion of rail services from Euston in years to come. In order to reduce significant impacts associated with future expansion of the station, the Council in developing the EAP has considered how the land should be used in the interim.

8.35 The following options were considered:

Option 4a) HS2 6 platform station with futureproofing to provide future station expansion with development above futureproofed area

Option 4b) HS2 6 platform station with futureproofing to provide future station expansion and no development/ temporary uses above futureproofed area

Option 4c) HS2 6 platform station with no futureproofing for future station expansion.

Sustainability Objectives		Options	4a	4b	4c
1	To promote the provision of a range of high-quality and affordable housing to meet local needs		+	-	
2	To promote a healthy and safe community		+	+	+
3	To ensure access to local shopping, community and leisure facilities.		+	-	+
4	To tackle poverty and social exclusion		+-	+-	+-
5	To improve amenity by minimising the impacts associated with development.		+-	-	+-
6	To conserve and improve open space provision and increase access to and enhancement of open space.		-	-	-
7	To improve local air quality and limit exposure.		0	0	0
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+-	+-	+-
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		+-	+-	+-
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		-	-	-
11	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		+-	+-	+-
12	To promote high quality and sustainable urban design.		+	+	+

Sustainability Objectives		Options	4a	4b	4c
1	To promote the provision of a range of high-quality and affordable housing to meet local needs		+	-	
2	To promote a healthy and safe community		+	+	+
3	To ensure access to local shopping, community and leisure facilities.		+	-	+
4	To tackle poverty and social exclusion		+-	+-	+-
5	To improve amenity by minimising the impacts associated with development.		+-	-	+-
6	To conserve and improve open space provision and increase access to and enhancement of open space.		-	-	-
7	To improve local air quality and limit exposure.		0	0	0
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+-	+-	+-
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		+-	+-	+-
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		-	-	-
13	To protect and enhance the historic environment		0	0	0
14	To ensure new development makes efficient use of land, buildings and infrastructure.		++	-	+
15	To encourage and accommodate sustainable economic growth and employment opportunity.		++	+	+
16	To maximise the benefits of regeneration and development to promote sustainable communities.		++	+	+

Commentary - options 4a, 4b and 4C

Option 4a) HS2 6 platform station with futureproofing to provide future station expansion with development above futureproofed area

- 8.36 Despite the Government confirming that HS2 will go ahead and will terminate at Birmingham, it is prudent to consider the options above about futureproofing for a station beyond six platforms. Option 4a considers the option which provides space for 10 platforms at Euston HS2 station and only operating six to provide for future provision, allowing enough space within the design to accommodate a ten-platform

station. Based on our understanding to deliver this futureproofed option, permanent development would in affect be over station development, given the complexity and works needed to provide either active or passive provision.

- 8.37 Given the constraints of over-station development, it is likely that commercial development would be more suitable in this location. Although there would be increased opportunity for development, the potential to deliver much needed affordable housing, particularly larger family housing would be limited in this location. However, the relatively higher value commercial development could help to support the delivery of housing (including affordable housing) elsewhere within the Euston station masterplan area.
- 8.38 With regards to urban realm there would need to be careful considerations around how the station integrates with the adjacent existing neighbourhood around Drummond Street to repair the urban grain lost from construction to date and to improve east and west connections across the station.
- 8.39 With all the options, it is anticipated that the previously agreed east to west connections will be reduced and so the design and location of the concourse at the front of the station and the relationship with the design of Network Rail station will be key to integrate to improve opportunities to travel via active modes of transport across and through the site.
- 8.40 The extent of the building footprint of the development would need to be carefully considered to ensure that there is provision for replacement open space, unless if it possible to find an alternative location for this elsewhere on the site, a comprehensive open space strategy as required by the polices should set out how a network of open spaces will be provided across the site.
- 8.41 For the station building itself this assessment raises the need to ensure the high-quality design required to ensure the fabric of the station maximises opportunities to improve its environmental performance. For example: the large station roof must utilise the surface area to increase biodiversity and integrate opportunities for blue roofs and/or grey water to reduce pressures on existing drainage systems and also options to integrate energy harvesting solutions to reduce the Carbon footprint of this and the overstation development.
- 8.42 As stated above it is likely as a result of the development being over-station that delivery of commercial space will prevail. It will be vital in this instance to ensure uses support the growth of the Knowledge Quarter and provide sufficient affordable workspace, employment opportunities and social infrastructure for local people in line with policy requirements.
- 8.43 It will be essential that the design of the HS2 station ensures an active frontage along its eastern edge and that station entrances align with Drummond Street to support the economy of existing businesses in the area.
- 8.44 Other key considerations are around the need to consider the meanwhile activation of the safeguarded space considering opportunities to temporary community and commercial space to ensure as best as possible space is activated and put to use.

Option 4b) HS2 6 platform station with futureproofing to provide future station expansion and no development/ temporary uses above futureproofed area

- 8.45 This option considers similar considerations to 4a) but without development above or only temporary uses which are unlikely to make a significant contribution to the economy, including any cross subsidy to residential growth or station development.
- 8.46 If a future-proofed option with no development above or only limited meanwhile uses was progressed, it is unlikely that the scheme would see the same social benefits, at least in the period where a decision on the future design of future-proofed element of the station was confirmed and built and whether this allowed for development.
- 8.47 As per the above option it is anticipated that the previously agreed east to west connections will be reduced with no opportunity for routes across the roof of the station and so the design and location of the concourse at the front and relationship with Network Rail station design will be key to integrate to improve opportunities to travel via active modes of transport across the site.
- 8.48 Depending on the design, this option would mean the station building would likely fill the full extent of the proposed site and hence not provide opportunities to increase the amount of ground accessible green open space in the area.
- 8.49 As per the above, the station building is still considerable in size therefore the station facility would need to consider within the design of the fabric of the station and how it can utilise the large roof area etc. to increase the biodiversity through green and blue roofs and consider energy harvesting solution to reduce the Carbon footprint.
- 8.50 The station with possibility of expansion for extra station platforms will still provide some opportunity to provide additional commercial floorspace across the site. It will be key to ensure the scale of provision is appropriate and supports growth of the Knowledge economy and does not detract from nearby Drummond street.

Option 4c) HS2 6 platform station with no futureproofing for future station expansion

- 8.51 If this solution is taken forward then the footprint of the site allocated for the HS2 station within the EAP could have a portion of land for development to the eastern side allocated to allow an adjacent development to be brought forward. This would allow for development on terra firma, reducing costs and complexity of build. This could make residential development more viable to consider however this would need to be balanced against London Plan policy which promotes uses suitable to the Central Activities Zone, including knowledge quarter uses. If , however, a decision was made in the future to expand the station, the disruption would be much greater than an option which includes future-proofing.
- 8.52 The creation of an additional site adjacent to the station presents an opportunity for a mixed-use development which could include an element of residential development and or commercial development which should provide support for local communities to access training and high quality jobs.
- 8.53 This option could allow for space to the West of the HS2 station as accessible green space which could increase the biodiversity of the area and increase the amount of green and recreational space.

- 8.54 This option which allows for additional land adjacent to the station in place of additional platforms would mean that a mixed use commercial and residential development could be created, however, should the station need to expand in the future, the cost, complexity and disruption from the construction would be far greater. The design of the additional development could be appropriate to ensure that existing businesses on Drummond Street and existing Knowledge Quarter uses in the area are supported.

Issue 4 Conclusion

- 8.55 These three options present varying benefits to the area with regards to the EAP priorities and benefits. In terms of comprehensive benefits, the six platform station with future-proofing for future station expansion with development above presents an opportunity for a development that could deliver development which could secure more significant social and economic benefits sooner. In addition it would allow for re-providing and increasing the amount of green infrastructure and open space and improvements to the urban realm both east to west and north south links and active travel around the area.
- 8.56 The risk in not building a station to meet future demand is considerable and in not future proofing the provision could result in future disruption and a need to rebuild portions whose environmental and social impacts could be significant.
- 8.57 Therefore, the general considerations that the EAP has taken into account is ensuring that the expectation of commercial development within the Euston Station and Tracks Chapters. There is a real need for the station to demonstrate legacy considerations to ensure the scheme is future proofed and the station design is comprehensive and exemplary to ensure through its design that it supports increased biodiversity, helps minimise water runoff and opportunities for energy harvesting.

9. APPRAISAL OF THE STRATEGIC PRINCIPLES AND DEVELOPMENT PRINCIPLES

- 9.1 Following on from the assessment of strategic options, the preferred way forward on the key issues for the future of Euston has been identified. This approach has been developed taking into account a number of sources, including:
- the responses to consultation on key issues
 - evidence we have collected and commissioned (including the sustainability appraisal process);
 - the policies and plans of the government and the Mayor of London;
 - Camden Local Plan Proposed Submission Draft, We Make Camden and other Council plans and strategies; and
 - other relevant plans and policies.
- 9.2 These preferred options are set out below and have been grouped according to theme. The matrix and accompanying commentary sets out the SA of these options and provides a justification for the appraisal. Where relevant, the main policy alternatives considered are listed below against the relevant policy along with a sustainability appraisal of these main alternatives.

Overall Strategy

Sustainability Objectives	Options	1 Overall strategy
1. To promote the provision of a range of high quality and affordable housing to meet local needs		++
2. To promote a healthy and safe community		++
3. To ensure access to local shopping, community and leisure facilities.		++
4. To tackle poverty and social exclusion		++
5. To improve amenity by minimising the impacts associated with development.		++
6. To conserve and improve open space provision and increase access to and enhancement of open space.		++
7. To improve local air quality and limit exposure.		++
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		++
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		++
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		++
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		++
12. To promote high quality and sustainable urban design.		+
13. To protect and enhance the historic environment		+/-
14. To ensure new development makes efficient use of land, buildings and infrastructure.		+
15. To encourage and accommodate sustainable economic growth and employment opportunity.		+
16. To maximise the benefits of regeneration and development to promote sustainable communities.		+

Commentary

- 9.3 The Overall Strategy would have a number of very positive sustainability impacts with significant potential for intensification and an opportunity to comprehensively transform Euston Station and the immediate area into a new residential and

business district, delivering new homes and jobs and a renewed transport interchange. This reflects the fact that the broad intentions of the strategy are to enable the delivery of additional homes and maximise potential economic benefits. Many people want to live in the Euston area but there is a limited supply of homes and prices are high. This is primarily due to the limited availability of land and competition from other uses, which have high returns on investment. The distribution of development, and approach to public realm and urban greening would help to meet a number of the sustainability criteria relating to air quality, sustainable modes of travel, healthy communities and social inclusion.

Land use strategy (Strategic Principle EAP 1)

Options Sustainability Objectives	Homes	Economy and employment.	Retail, leisure and Culture	Social infrastructure	Meanwhile uses	Health & well being	Safety and security	Inclusive growth & delivering
1. To promote the provision of a range of high quality and affordable housing to meet local needs	++	0	0	0	0	0	0	+
2. To promote a healthy and safe community	+	+	+	+	+	++	++	+
3. To ensure access to local shopping, community and leisure facilities.	0	0	++	++	0	0	0	+
4. To tackle poverty and social exclusion	+	+	+	+	+	+	+	++
5. To improve amenity by minimising the impacts associated with development.	0	0	0	0	+	+	++	+
6. To conserve and improve open space provision and increase access to and enhancement of open space.	0	0	0	0	0	0	0	0
7. To improve local air quality and limit exposure.	0	0	0	0	0	+	0	0
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	0	0	0	0	0	0	0	0
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	0	0	0	0	0	0	0

Sustainability Objectives \ Options	Homes	Economy and employment.	Retail, leisure and Culture	Social infrastructure	Meanwhile uses	Health & well being	Safety and security	Inclusive growth & delivering
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0	0	0	0	0	0	0	0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	+	+	+	0	0	+	0	0
12. To promote high quality and sustainable urban design.	+	+	+	+	0	0	+	0
13. To protect and enhance the historic environment	0	0	0	+	0	0	0	0
14. To ensure new development makes efficient use of land, buildings and infrastructure.	+	+	+	+	++	0	+	+
15. To encourage and accommodate sustainable economic growth and employment opportunity.	+	++	++	+	++	+	+	++
16. To maximise the benefits of regeneration and development to promote sustainable communities.	++	++	++	+	++	++	0	++

Commentary - Homes

9.4 The EAP Land use Strategic Principle supports the delivery of a new homes and could therefore have a positive impact in terms of provision of a range of high quality and affordable housing to meet local needs. The London Plan (Policy H1) sets a target for an additional 10,380 homes to be delivered in Camden over a ten year period from 2018/19 to 2028/29. This equates to a need to deliver a minimum of 1,038 homes per year. Within Camden's overall housing target there is also a target to deliver 3,280 homes on small sites. The housing target in the draft Local Plan is a capacity-based target, based on expected delivery over the Plan period up to 2041 (from sites with planning permission and allocated sites), factoring in a small sites windfall allowance and taking into account past under-delivery. The target also reflects the uncertainty and delay in development at Euston, related to HS2.

9.5 The number of homes that will be provided at Euston has been reduced since the adopted EAP in 2015. This is due to less land being enabled at the Station and on Station tracks. The EAP 2015 set out that between 2,800 and approximately 3,800

additional homes along with replacement homes should be provided at Euston. The Updated EAP 2025 expects that developments in Euston will deliver a minimum of 1,700 new homes, rising to upwards of 2,100. It also recognises that should new areas for development be identified through design refinement of the stations and/ or the work to meet Central Government's ambition to deliver new homes in the wider Euston area, it may be possible to deliver in excess of the development identified in the EAP subject to it meeting the objectives in this Plan and assessment against relevant policies in the Development Plan also allows for great support of this important objective.

- 9.6 The EAP Landuse Strategy would deliver wider social benefits through enabling a range of types of homes, including affordable homes, providing new homes with excellent public transport links and good access to local facilities and services. This will aid the creation of mixed and balanced, sustainable communities. It is important to ensure that policy helps to retain Camden's social mix and make sure that the borough does not become polarised between wealthy and less well-off residents. We face the challenge of providing both more homes and a more varied range of housing to meet existing and future housing needs, in particular those of young people and families, who often struggle to find suitable and affordable homes in Camden. Residential properties should be delivered in line with the mix set out in the Development Plan.

Commentary - Economy and employment

- 9.7 The strategy provides a strong focus on economic growth and would provide strong benefits in terms of tackling poverty and exclusion, promoting equal opportunities and maximising the benefits of regeneration. It promotes the provision of employment uses in a highly sustainable location and helps to strengthen and grow the Knowledge Quarter inclusive innovation district where, according to the 'Euston Area Regeneration Economic Impact Assessment' a report by Metro Dynamics, the area's economic output is growing faster than even the City of London, with economic output growing by 70% from 2011 – 2019 in the Knowledge Quarter compared to 49% in the City of London.

Commentary - Retail leisure and Culture

- 9.8 This approach would generate strong positive impacts by seeking to increase local shopping, leisure and cultural provision in a sustainable location. The introduction of new retail uses would also contribute to the creation of vibrant streets, which can generate benefits in terms of safer communities. The policy would promote economic growth and regeneration by supporting the role of existing commercial centres whilst enabling additional retail growth.
- 9.9 The support of existing, and creation of new cultural, leisure, learning and play facilities will be an integral part of development, and the experience of living and working in, and visiting Euston. Cultural facilities should be appropriately located with priority for location in commercially-focused areas to add dynamism and people to these areas. Such uses would contribute to the creation of a democratic place that is openly accessible and welcoming to all.

Commentary - Social infrastructure

- 9.10 The approach to social infrastructure in the Strategic Principle would have strongly positive sustainability impacts by contributing to health and other facilities that should help to support healthy communities, enhance access to facilities through delivering new and improved provision, and contribute towards social inclusion, regeneration and sustainable communities by providing facilities and services that play an important part in creating sustainable neighbourhoods.
- 9.11 The approach would also generate positive impacts in terms of supporting housing growth, by providing supporting facilities and services, reducing reliance on private transport by ensuring provision of facilities and services close to where residents live.

Commentary - Meanwhile uses

- 9.12 This approach would be likely to generate significant benefits for local occupants in terms of health and safety and noise impacts by allowing for changes of use for buildings that would be significantly affected by potential significant noise and disturbance from HS2. The approach would bring about an efficient use of land and making sure that buildings contribute to vibrant and safe communities. Whilst this approach could potentially lead to the (temporary or even permanent) loss of some existing homes, this would only be in the event that homes were rendered unviable as a result of HS2, but they would sought to be replaced in the longer-term. It also promotes the best use of land in the interim period, providing benefits to the local community in the short to medium term and provides opportunities to test and prototype ideas for the future development with the local community.

Commentary -Health and Well-being

- 9.13 Camden and the Euston area has one of the largest health inequality gaps in England and people suffering from poor health are generally concentrated in some of the borough's most deprived wards including Somers Town and Regents Park Estate. Health is intrinsically linked to early life experience, education, employment, housing, leisure and the local environment – otherwise known as the social determinants of health. These are the social, cultural, economic and environmental factors that shape the conditions in which we live. In combination with the London Plan, the Local plan and other planning policy and guidance, the policies in this Plan aim to engender a positive approach to health and well- being. The creation of healthy environments for people of all ages across the Euston area will be a key consideration when the Council assesses planning applications. In line with policies in the Local Plan, applications for major development at Euston will be required to include a Health Impact Assessment.

Commentary -Safety and Security

- 9.14 This additional section to the Land use Strategy since the 2015 adopted EAP highlights the importance of safety and security for Euston and seeks to ensure that existing and new communities feel safe in streets and spaces so that they are enjoyable to use through design, management and maintenance. If people feel safe and secure they are more likely to spend time in their local community, with

the opportunity to make connections and to travel actively which is likely to benefit their health and well being.

Commentary -Inclusive growth and delivering Social value

- 9.15 This addition of this to the Land use Strategy seeks to reduce inequalities and increase life chances in local residential communities. It will help to create opportunities for all so that investment delivers benefits where they are most needed, helping to address some of the inequalities which have been identified in the Euston area and supporting local people to be well-placed to access future opportunities in the development.

Main policy alternatives

- 9.16 There are no specific alternatives identified for this Strategic Principle, given the higher level policies and Council's priorities for delivering inclusive growth in the area.

Design strategy (Strategic Principle EAP 2: Design)

Sustainability Objectives	Option	Urban Design Strategy
1. To promote the provision of a range of high quality and affordable housing to meet local needs		+
2. To promote a healthy and safe community		+
3. To ensure access to local shopping, community and leisure facilities.		+
4. To tackle poverty and social exclusion		0
5. To improve amenity by minimising the impacts associated with development.		+
6. To conserve and improve open space provision and increase access to and enhancement of open space.		+
7. To improve local air quality and limit exposure.		0
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		+

Sustainability Objectives	Option	Urban Design Strategy
12. To promote high quality and sustainable urban design.		++
13. To protect and enhance the historic environment		+
14. To ensure new development makes efficient use of land, buildings and infrastructure.		+
15. To encourage and accommodate sustainable economic growth and employment opportunity.		+
16. To maximise the benefits of regeneration and development to promote sustainable communities.		+

Commentary - Design strategy

9.13 As with the previous SA for the EAP 2015, urban design plays an important role in ensuring that new development is of high quality and contributes positively to the character and context of the Euston area in terms of massing, design, legibility and layout. The emphasis on public realm, improved connectivity and new streets with active frontages would provide health benefits by promoting active travel, creating safer street environments and improving access to facilities. High quality design and public realm can help to maximise benefits of regeneration by creating high quality places for local communities. Economic visioning has highlighted the importance of creating a high quality, distinctive place to maximising the economic potential of Euston. High quality public realm can also help to address flood risk through appropriate sustainable drainage measures. The Design Strategy has the addition of ensuring that development is designed in a low carbon way and for sustainable living in the short and long term.

Main policy alternatives

9.14 There are no specific alternatives identified for the Strategic Principle - Design.

Transport Strategy (Strategic Principle EAP 3: Transport)

Sustainability Objectives	Options	Transport Strategy
1. To promote the provision of a range of high quality and affordable housing to meet local needs		+
2. To promote a healthy and safe community		+
3. To ensure access to local shopping, community and leisure facilities.		+
4. To tackle poverty and social exclusion		+

Sustainability Objectives	Options	Transport Strategy
5. To improve amenity by minimising the impacts associated with development.		+-
6. To conserve and improve open space provision and increase access to and enhancement of open space.		+
7. To improve local air quality and limit exposure.		+-
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		++
12. To promote high quality and sustainable urban design.		+
13. To protect and enhance the historic environment		+
14. To ensure new development makes efficient use of land, buildings and infrastructure.		+
15. To encourage and accommodate sustainable economic growth and employment opportunity.		+
16. To maximise the benefits of regeneration and development to promote sustainable communities.		++

Commentary

- 9.15 As with the 2015 EAP, the Transport Strategy would help to support economic, retail and housing growth and regeneration through the provision of necessary supporting infrastructure, and providing new connections and public realm improvements that would make the area more attractive as a growth location, as well as making it function better.
- 9.16 Improved connections would also be likely to improve access to services and economic opportunities. Public realm enhancements would help improve the safety of streets and other public spaces, whilst the promotion of walking and cycling, through improved and safer infrastructure, would help to promote healthy lifestyles.
- 9.17 An emphasis on more sustainable transport modes and measures that reduce the dominance of motor vehicles will help to minimise private motorised transport and maximise use of more efficient energy and low emission modes. The introduction

of Euston Road as an Air Quality Focus Area helps encourage more sustainable transport modes, including electric vehicles, as well as helping to address noise and air quality issues associated with transport. Sustainable freight modes and methods should be prioritised across the station site minimise the impacts of freight and establish options for consolidating, reducing, remodelling and retiming deliveries. TfL buses now meet ULEZ emissions standards across the whole area.

Main policy alternatives - Transport

9.18 SP3.1 Euston station bus provision options (being considered by Camden and TfL):

- Option 1a) SP3.1a: Provide a one-way linear bus station
- Option 1b) SP3.1b: Retain or re-provide existing bus station, stops and stands
- Option 1c) SP3.1c: Re-design the layout of the bus facility
- Option 1d) SP3.1d: Relocate bus stops and stands in existing bus station to surrounding, existing road network

SP3. 2 Alternative options for taxi provision

- Option 2a) SP2.1a: Location of taxi rank on western side of the Euston Masterplan Development to serve HS2, Network Rail and Lendlease with some limited pick up and drop off points for Passengers with Reduced Mobility on Eversholt Street
- Option 2b) SP2.2b: Location of taxi rank on the station site that serves HS2, Network Rail and Lendlease on the eastern side, with some pick up and drop off points for Passengers with Reduced Mobility on Eversholt Street
- Option 2bc) SP2.2c: Taxi rank on the public highway, including pick up and drop off spaces for Passengers with Reduced Mobility

SP3.3 Euston Area Walking and Cycling Improvement Options

- Option 3a) SP3.1a: Retain levels of cycling and provision on the Euston Station Site and on surrounding street network as they currently are
- Option 3b) SP3.1a: Improve walking and cycling provision on the Euston Station site but leave highway network as it currently is.
- Option 3c) SP3.1a: Improve walking and cycling provision on the Euston Station site and provide some improvements for pedestrians and cyclists on the surrounding road network
- Option 3d) SP3.1a: Improve walking and cycling provision on the Euston Station site and provide significant improvements for pedestrians and cyclists on the surrounding road network

Sustainability Objectives	SP 3.1a	SP 3.1b	SP 3.1c	SP 3.1d	SP 3.2a	SP 3.2b	SP 3.2c
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0	0	0	0	0	0	0
2. To promote a healthy and safe community	+	-	+	0	+	0	-
3. To ensure access to local shopping, community and leisure facilities.	+	0	+	+	0	0	-
4. To tackle poverty and social exclusion	0	0	0	0	0	0	-
5. To improve amenity by minimising the impacts associated with development.	+	-	+	0	+	+	-
6. To conserve and improve open space provision and increase access to and enhancement of open space.	+	-	+	+	+	-	0
7. To improve local air quality and limit exposure.	0	0	0	0	+	+	-
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	0	0	0	0	0	0	0
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	0	0	0	0	0	0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	+	-	+	+	0	0	0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	+	-	+	0	+	+	-
12. To promote high quality and sustainable urban design.	+	-	+	+	+	+	-
13. To protect and enhance the historic environment	+	-	+	+	0	0	0
14. To ensure new development makes efficient use of land, buildings and infrastructure.	+	-	+	+	+	0	-

Sustainability Objectives	SP 3.1a	SP 3.1b	SP 3.1c	SP 3.1d	SP 3.2a	SP 3.2b	SP 3.2c
15. To encourage and accommodate sustainable economic growth and employment opportunity.	0	0	0	+	0	0	-
16. To maximise the benefits of regeneration and development to promote sustainable communities.	+	0	+	0	+	+	-

Sustainability Objectives	SP 3.3a	SP 3.3b	SP3.3c	SP3.3d
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0	0	0	0
2. To promote a healthy and safe community	-	+	+	+
3. To ensure access to local shopping, community and leisure facilities.	-	+	+	+
4. To tackle poverty and social exclusion	-	-	+	+
5. To improve amenity by minimising the impacts associated with development.	-	-	0	+
6. To conserve and improve open space provision and increase access to and enhancement of open space.	0	0	0	0
7. To improve local air quality and limit exposure.	-	-	+	++
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	0	0	0	0
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	0	0	0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0	0	0	+
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	-	0	+	++
12. To promote high quality and sustainable urban design.	-	0	+	++

Sustainability Objectives	SP 3.3a	SP 3.3b	SP3.3c	SP3.3d
13. To protect and enhance the historic environment	0	0	0	0
14. To ensure new development makes efficient use of land, buildings and infrastructure.	-	0	+	++
15. To encourage and accommodate sustainable economic growth and employment opportunity.	-	+	+	+
16. To maximise the benefits of regeneration and development to promote sustainable communities.	-	0	+	+

- **SP3.1: Euston station bus provision options (being considered by Camden and TfL)**

9.19 Proposed Option SP3.1a (Provide a one-way linear bus station)

The proposed linear bus station layout at the northern side of Euston Square Gardens, with some limited stops on Euston Road, is expected to improve the sustainability performance of the current facility. The current facility detracts from local place quality and is difficult to navigate for people walking and cycling to and from the station, as well as for bus passengers. It is likely to improve accessibility and amenity of the local area, without taking away undue space from Euston Square Gardens. If designed sensitively, so as to avoid creating issues around active travel permeability or creating a 'wall' of buses across the front of the station it has the potential bring benefits placemaking and other sustainability benefits. These include enhancing the open space (including its biodiversity) and making it easier to access Euston Square Gardens and to walk and cycle to and from the station (provided that active travel-friendly crossings over the linear bus street are included). The overall design could be simpler to navigate and more pleasant to use than the current layout. Although subject to further design development and transport modelling, this is the preferred option following initial work to look at the spatial layout of the campus.

9.20 Alternative Option SP3.1b (Retain or re-provide existing bus station, stops and stands)

This is rated negatively in this assessment. The arrangement of the existing bus facility, guard railing and surrounding urban realm creates a poor quality environment for waiting passengers and a high degree of severance for people attempting to walk and cycle through the area. The limited pedestrian crossing options create the potential for conflict between buses and pedestrians, reducing safety. Retaining the existing facilities would mean that bus infrastructure is prioritised over key aspirations for walking and cycling in the area, which is not in line with Camden's Road User Hierarchy. This option does not contribute sufficiently towards delivering the objectives of the Healthy Streets approach. This

would significantly impact upon the level of cycling, walking and public realm improvements that could be achieved by HS2 and Lendlease.

- 9.21 The layout of the buildings and bus station also detracts from the function, image and attractiveness of the station area, reducing the potential benefits (including economic) from regenerating the site. The current poor public realm does not contribute to enhancing surrounding heritage assets, and reduces potential development land in that part of the site.

9.22 Alternative Option SP3.1c (Re-design the layout of the bus facility)

The redevelopment of Euston Station offers the opportunity to improve on and address the current bus station layout, most notably the barrier that this creates for pedestrians and cyclists. This could include redesigning the bus facility on the same site but with a smaller footprint. This would have similar benefits to Option 3.1a, provided it is designed sensitively with good provision for pedestrian and cyclist permeability. It would also contribute to freeing up more development land, with greater economic and regeneration benefits and would reduce the amount of land needed from Euston Square Gardens, supporting biodiversity and green space objectives. However, overall this option has been identified as unworkable due to TfL's operational requirements and the impact alternative layouts would have on Euston Square Gardens.

9.23 Alternative Option SP3.1d (Relocate bus stops and stands in existing bus station to surrounding, existing road network)

This would be likely to generate a range of positive and negative sustainability impacts. This option would remove buses from the station site 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 could however put more pressure on the road network which limits the level of improvements that can be introduced for people walking and cycling. It also 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. This could be remedied if accompanying measures are introduced that reduce the number of motor vehicles and provide improved facilities for pedestrians and cyclists, such as safer pedestrian crossings and segregated cycle lanes.

- 9.24 This option would also allow the most to be made of development opportunities on the Euston Station site, and improve the image and attractiveness of the site, with consequent benefits in terms of economic growth and investment. However, this option would require bus turning and standing space to be provided elsewhere which could have an impact on development opportunities and having more bus stops and stands on the roads could create a 'wall' of buses around the development.

- 9.25 This option could generate a negative impact by placing bus stops further from the station entrance/ exit, thus potentially reducing the effectiveness of interchange. It could also reduce capacity for traffic on Euston Road, leading to delays and possible dispersion of traffic onto surrounding local roads. Also any impacts on bus journey times could be mitigated through introducing accompanying bus priority measures, such as moving bus stop cages into the carriageway, creating more bus lanes where feasible, etc. TfL have advised that for operational reasons they need a bus facility in the south east corner of the site and a fully dispersed option would be difficult to implement.

- 9.26 As designs and layouts are yet to be confirmed and tested, it is necessary to include a level of flexibility within the EAP. The policy seeks to create interchange facilities for buses and taxis that are both efficient, accessible and integrate seamlessly with the Euston Masterplan Development, that have regard to Camden's Road User Hierarchy and enhance the public realm. It includes a number of requirements which any proposal for a bus facility should address and includes reference to delivering a one-way linear facility.

- **SP3.2: Alternative options for taxi provision**

- 9.27 Provision for taxi ranking as part of the transport interchange needs to be provided. Previously it was included in the basement of the Network Rail station and is temporarily located on Euston Square Gardens while HS2 works are underway. Previous proposals by HS2 Ltd. included a re-provided taxi rank on land created by decking over the railway tracks. A reduction in decking has removed this opportunity. A permanent location for taxis needs to be identified and the main options are considered below.

9.28 Proposed Option SP3.2a) Location of taxi rank on western side of the Euston Masterplan Development with some limited pick up and drop off points for Passengers with Reduced Mobility on Eversholt Street

The policy suggests that the taxi facility should be provided within a building footprint which should help to deliver against the objective to make the best use of land. By locating the facility under a new building, impacts on existing roads and properties are reduced when compared to the other options.

Overall, this option is considered to have fewer adverse impacts that involve general taxi ranks on the highway and could therefore reduce associated road safety risks and local exposure to air pollution (largely from brake and tyre wear given that most taxis are now electric) by consolidating taxis in one place. Provided that pick up and drop off points on the public highway on Eversholt Street are limited to a few bays for passengers with reduced mobility, this would have a much lower impact on local road safety, congestion and amenity than a full taxi rank. This layout option would need to be accompanied by separate taxi management and private hire vehicle management strategies that reduce the risk of taxis overranking onto the highway and of PHVs dropping off and picking up informally on Eversholt Street, as they do currently.

This location would mean that taxis are also in a less prominent position than they are currently, making them less attractive to use than more sustainable modes such as walking, cycling and public transport. Overall, this option also reduces the physical impact and the barriers that taxi ranking on the public highway pose to using sustainable modes. This will help improve local permeability, making it easier to access the new development and thereby making it more attractive. On balance, this is considered the most sustainable option and is included in the EAP update, with the exact location to be confirmed as designs for the Euston station masterplan develop.

9.29 Alternative Option SP3.2b) Location of taxi rank on the station site that serves HS2, Network Rail and Lendlease on the eastern side, with some pick up and drop off points for all Passengers on Eversholt Street

- 9.30 This would largely have the same impacts as option SP3.2a but as the taxi rank location would be located on the eastern side in this option, it would have the disbenefit of requiring taxi access for all taxis, not just a limited number servicing those with passengers with reduced mobility on Eversholt Street. Eversholt Street, which is closer to existing residential areas and taxi movements here could be potentially in conflict with the loading requirements of businesses in the locations where these ranks could be sited. Space is limited here and restricted by the existing urban form when compared to option SP3.2a which will be in an area of new development. This option would also conflict with opportunities to reduce traffic volumes on Eversholt Street, reducing the overall plan's potential to reduce the dominance of motor-vehicles in the area, with the associated negative implications for Camden's aspirations for air quality, and increased attractiveness of walking and cycling. If Eversholt Street was to become more dominated by taxis, it may reduce the attractiveness of walking and spending time in the area, reducing the potential of the regeneration benefits to be distributed amongst the wider community. This option would also be in a visually prominent and easy to access position, meaning that it would potentially attract people to use taxis over other more sustainable modes of transport, which would conflict with Camden's aspirations to encourage a shift to more sustainable transport modes.
- 9.31 This option would also conflict with opportunities to reduce traffic volumes on Eversholt Street, reducing the overall plan's potential to reduce the dominance of motor-vehicles in the area, with the associated implications for air quality, and increased attractiveness of walking and cycling. If Eversholt Street was to become more dominated by taxis, it may reduce the attractiveness of walking and spending time in the area, reducing the potential of the regeneration benefits to be distributed amongst the wider community. This option would also be in a visually prominent and easy to access position, meaning that it would potentially attract people to use taxis over other more sustainable modes of transport, which would conflict with Camden's aspirations to encourage a shift to more sustainable transport modes.
- 9.32 Alternative Option SP3.2c) Location of taxi rank on the public highway, including pick up and drop off spaces for Passengers with Reduced Mobility**
This option would free up more space for other land uses within the Euston Masterplan Development. This could have helped maximise the regeneration opportunity within the main site and to create more open and green space, with potential biodiversity benefits. However, this would have come with a trade-off of significant negative impacts on the public highway. Taxi ranks on the highway would have been much closer to residents and would have removed space that could have been allocated to more sustainable highway. Potential ranking locations on both Eversholt Street and Hampstead Road may contribute to congestion and limit the space available for wider pavements, new crossings, cycle tracks, bus and green infrastructure, etc. While management systems could have been employed to manage queuing taxis, experience from other parts of the borough such as King's Cross Station shows that this is challenging to implement without funding, with taxis simply joining the end of formal ranks, creating congestion and reducing road safety. This type of scenario could create an environment where travelling to and from the station by sustainable modes becomes challenging, as congestion from taxis makes walking and cycling unattractive and unsafe. This would also undermine Camden's aspirations to increase the sustainable mode share of journeys in Euston, by making these less attractive while simultaneously making taxi travel a more visible choice for passengers. It would also clash with

Camden's aspirations to reduce traffic on Eversholt Street. A public highway environment that is congested with taxi ranks could also reduce local economic regeneration opportunities if this discourages people travelling on foot or by bike to visit existing local shops because the street environment does not cater to them and is unpleasant to spend time in.

- ***SP3.3: Alternative options for Euston Area Walking and Cycling Improvement Options***

9.33 Alternative Option SP3.3a) Retain levels of walking and cycling and provision on the Euston Masterplan Development Site and surrounding street network as they currently are (making no improvements to infrastructure)

Overall travel demand, including for walking and cycling is expected to increase with the arrival of HS2 and the new development at Euston. Some parts of the existing street network and the Euston Station site are already congested and are hot spots for road safety issues. This option therefore risks exacerbating these issues as journey numbers in the area increase. If the environment becomes more crowded, it may also limit the extent to which Camden's aspirations to increase the mode share of walking and cycling trips to and from the station can be fulfilled. This is because a more congested street environment will be unpleasant and more dangerous to navigate. For example, if footfall increases, some areas and crossing points may see so much demand that people step into the carriageway, increasing the risk of collisions.

9.34 Modelling forecasts show that with an increase in trips resulting from the new development and station, the busiest pavement areas that need upgrading would include the northern sections of Upper Woburn Place and Gordon Street, the southeastern corner of Euston Square Gardens, and the section of Eversholt Street between Doric Way and Grafton Place, as well as Euston Road. Crossings over Euston Road, particularly at the Gordon Street and Upper Woburn Place junctions are expected to become particularly busy and could become dangerous if not upgraded, either through an underground link between Euston and Euston Square underground stations and improved above ground crossings. A more congested pavement environment may see passengers stick to other modes, such as the London Underground, which is forecast to come under increased pressure in future development scenarios. Retaining current levels of walking and cycling provision would also make it difficult to fulfil Camden's aspiration to overcome existing community severance issues caused by the station site, which could be addressed through new walking and cycling routes through and around the station.

9.35 Alternative Option SP3.3b) Improve walking and cycling provision on the Euston Station site but leave highway network as it currently is

Improving walking and cycling provision on the station site would help overcome local severance issues by making it easier to walk across and around the station. This would help improve connectivity between Somers Town, Regent's Park Estate and the station in particular. It would also help provide alternative east west routes to Euston Road, improving the amenity and safety of these journeys and reducing exposure to air pollution for people who use these alternative routes.

9.36 However, as noted in Option 3.3a, not improving provision on the public highway would risk limiting the extent to which Camden's aspirations to encourage walking and cycling, improve road safety and local permeability can be fulfilled. Improving walking and cycling within the Euston Masterplan Development but not on the wider street network could also limit the potential to distribute the benefits of Euston's regeneration more widely to surrounding communities, if these remain congested and unpleasant to walk and cycle through. It could also limit the regeneration potential of the Masterplan Development itself, if the surrounding street network is not attractive enough to encourage people to navigate to and from Euston by walking and cycling, modes that have been shown to be associated with higher spending in town centres.

9.37 Alternative Option SP3.3c) Improve walking and cycling provision on the Euston Station site and provide some improvements for pedestrians and cyclists on the surrounding road network

This option would help overcome local severance issues, while encouraging a somewhat higher share of trips to be made by walking and cycling to and from Euston and throughout the wider area. Improvements for pedestrians and cyclists within the Euston Development Masterplan and on the public highway may include: new and improved crossings, wider pavements, and improved public realm with shade and resting spots, segregated cycle infrastructure, separate cycle signals and advanced stop lines. Both modes could also benefit from low-traffic or pedestrianised streets. If only some of these improvements are implemented on the public highway, improved locations may see crowding increase if they become more attractive to pedestrians.

9.38 For cycling, partial infrastructure improvements on the public highway could risk encouraging cyclists to travel on incomplete routes, leaving them unprotected in areas where infrastructure has not been rolled out consistently. While this option would go some way to encourage sustainable travel and support local regeneration objectives, it would not maximise the potential of the regeneration to deliver benefits in these areas and could risk encouraging crowding in isolated areas where benefits are provided or encourage cyclists to travel to less safe locations.

9.39 Proposed Option 3.3d) Improve walking and cycling provision on the Euston Station site and provide significant improvements for pedestrians and cyclists on the surrounding road network

9.40 This option is most likely to maximise the benefits that the regeneration of Euston delivers for sustainable travel, local amenity, street quality, community connectivity and regeneration. This option is proposed so that Camden's most ambitious aspirations can be set out holistically, including how optimal walking and cycling provision within the Euston Masterplan Development and the surrounding street network could interconnect. The proposed Transport Strategy includes several routes through the Masterplan Development that would connect key streets in Somers Town and Regent's Park, overcoming long-term severance issues that mean it not only would become easier for station passengers and development users to travel by walking and cycling, but for local communities too. The number of proposed routes through and around the station is already scaled back from previous iterations of the plan, due to over-station development no longer being

economically viable. The proposed routes are considered priority routes and it is acknowledged that the feasibility of delivering these will need to be tested further in the spatial planning process.

- 9.41 Significant walking and cycling improvements on the surrounding highway network would not only include wider pavements, new and improved crossings and cycle lanes or tracks where feasible but would also cover the provision of the new underground link between Euston and Euston Square underground stations (this is considered critical to minimise above ground crowding levels on crossings at Euston Road). The significant improvements would also include traffic reduction measures on Eversholt Street, to protect communities in Somers Town and to enable this street to be upgraded to a sustainable transport corridor with improvements for walking, cycling and buses. Significant improvements would also cover the provision of a consistent cycle infrastructure network that connects the Euston Masterplan Development to the wider London cycle network, improves permeability through the site and increases east-west cycle connectivity. Significant improvements could also include introducing new areas of planting and biodiversity on traffic calmed and restricted areas of the public highway. This proposed option is considered best suited to overcoming existing challenges around severance, road safety and poor amenity of some streets on the highway network. It would also create the most optimal environment for delivering on Camden's sustainable travel, road safety, regeneration and urban design aspirations.

Conclusion - Transport Options

- 9.42 The Transport Strategy aims to support the regeneration of Euston and ensure connectivity, and sustainable development. This section has assessed a series of proposed and alternative transport options which have been assessed against 16 sustainability objectives, with particular emphasis on promoting healthy communities, reducing reliance on private vehicles, improving air quality, and enhancing urban design.
- 9.43 In terms of the Bus Provision options (SP3.1), the proposed linear bus station (Option 1a) is the most sustainable option, improving accessibility, public realm, and biodiversity while reducing the severance that the station currently causes. Other options present trade-offs, with Option 1b rated negatively due to poor pedestrian safety and urban quality.
- 9.44 For the Taxi Provision (SP3.2) Option 2a, (locating the taxi rank on the western side), is the preferred option for minimising road safety risks and supporting sustainable travel. Option 2c, (placing ranks on the public highway), is least favourable option due to congestion and negative impacts on pedestrian and cycling environments.
- 9.45 In terms of the Walking and Cycling Improvements (SP3.3), the proposed Option 3d delivers the most significant benefits, including enhanced permeability, reduced severance of the station, and improved air quality. It aligns best with Camden's aspirations for sustainable travel and regeneration. The lesser options (3a–3c)

offer partial improvements but risk crowding, safety issues, and limited community benefit.

- 9.46 To conclude, the Transport Strategy prioritises sustainable transport modes and urban design enhancements to maximise regeneration benefits and community connectivity. Proposed options 1a, 2a, and 3d are best aligned with Camden's sustainability objectives and long-term vision for Euston.

Environment Strategy (Strategic Principle EAP4: Environment)

Sustainability Objectives	Options	Environment Strategy
1. To promote the provision of a range of high quality and affordable housing to meet local needs		0
2. To promote a healthy and safe community		++
3. To ensure access to local shopping, community and leisure facilities.		0
4. To tackle poverty and social exclusion		+/-
5. To improve amenity by minimising the impacts associated with development.		+
6. To conserve and improve open space provision and increase access to and enhancement of open space.		0
7. To improve local air quality and limit exposure.		++
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		++
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		++
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		++
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		+
12. To promote high quality and sustainable urban design.		+
13. To protect and enhance the historic environment		0
14. To ensure new development makes efficient use of land, buildings and infrastructure.		+

Sustainability Objectives	Options	Environment Strategy
15. To encourage and accommodate sustainable economic growth and employment opportunity.		=
16. To maximise the benefits of regeneration and development to promote sustainable communities.		+

Commentary

- 9.47 In response to the Council's Climate and Ecological Emergency declaration in 2019, the EAP Update seeks to ensure that development at Euston meets the highest feasible environmental standards during construction and occupation. In large, it refers to the policies in the Camden Local Plan Proposed Submission Draft which seek to ensure that new development is designed to mitigate and adapt to climate change to respond to the climate emergency, focusing on maximising resource and energy efficiency and delivering net zero carbon development which, in operation, is ultra low energy, fossil fuel free and uses low carbon heat.
- 9.48 Euston specific elements included in the EAP require developments to:
- Explore utilising low cost, low carbon heat including waste heat sources
 - Explore opportunities for local off-setting for carbon savings
 - Where it is demonstrated that providing SuDS are not feasible on site, developers should look at contributing to support off-site SuDS measures
- 9.49 The proposed use of ultra low, fossil fuel free energy and low carbon heat and renewable technologies aim to deliver a net zero carbon development which will make a positive contribution towards the efficient use of infrastructure. The promotion of an enhanced green infrastructure network would be likely to generate positive impacts in terms of flood risk, noise and air quality, through the introduction of additional urban drainage measures and urban greening. Resource and energy efficiency will promote sustainability benefits and could promote some economic benefits in terms of reducing fuel poverty in energy efficient buildings.
- 9.50 It is considered that due to the extensive policies set out in the Camden Local Plan Proposed Submission Draft, any reasonable alternative policies for the Euston Area Plan Update are limited. The 2025 Environment Strategy has tried to incorporate Euston specific wording that is relevant for future development.
- 9.51 When the EAP was developed in 2015 the focus was on local DEN (decentralised energy networks) using gas powered CHP (combined heat and power) as the lowest carbon option and a development a site wide network was considered a priority. It was considered that they may address fuel poverty, and would allow for the most efficient possible use of energy infrastructure. Now in 2025, the decarbonisation of the grid and development of heat pump technology means that

that is no longer the lowest carbon option and gas powered CHP also have air quality impacts. Instead it is considered appropriate not to specify this within policy.

- 9.52 In addition, due to the constraints on the site there may need to be multiple solutions for energy efficiency with the potential for connection to various energy networks and opportunities to use waste heat from the stations. These will have considerable environmental benefits for Euston. The revised Environment Strategy proposes 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.
- 9.53 The revised Environment Strategy in the EAP Update reflects Camden's commitment to addressing the Climate and Ecological Emergency through ambitious, site-specific policies. It prioritises net zero carbon development, resource and energy efficiency, and enhanced green infrastructure. The strategy supports sustainable communities by promoting low carbon heat sources, local carbon offsetting, and urban greening, while recognising the need for flexible energy solutions due to site constraints.
- 9.54 Overall, the Environment strategy aligns strongly with the Sustainability Objectives, particularly in improving air quality, managing water resources, enhancing biodiversity, and reducing carbon emissions. It represents a forward-looking approach to urban development that balances environmental performance with regeneration and community benefit. There were not considered to be any main policy alternatives.

Open Space Strategy (Strategic Principle EAP5: Open Space)

- 9.55 Due to the importance of Open Space across the Euston area, and the large extent to which the amount of open space has been affected or lost since 2015 due to HS2 construction, it was considered that a separate policy is appropriate.

Sustainability Objectives	Options	Open Space Strategy
1. To promote the provision of a range of high quality and affordable housing to meet local needs		0
2. To promote a healthy and safe community		++
3. To ensure access to local shopping, community and leisure facilities.		+
4. To tackle poverty and social exclusion		0
5. To improve amenity by minimising the impacts associated with development.		+
6. To conserve and improve open space provision and increase access to and enhancement of open space.		++

Sustainability Objectives	Options	Open Space Strategy
7. To improve local air quality and limit exposure.		+
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		++
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		++
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		+
12. To promote high quality and sustainable urban design.		+
13. To protect and enhance the historic environment		0
14. To ensure new development makes efficient use of land, buildings and infrastructure.		+
15. To encourage and accommodate sustainable economic growth and employment opportunity.		0
16. To maximise the benefits of regeneration and development to promote sustainable communities.		+

Commentary

- 9.56 The addition of a separate Open Space policy allows further guidance to be given in the EAP about how we expect to see open space delivered. The policy sets out the Council's expectation that the open space lost as a result of the HS2 scheme will be reprovided and that open space to meet the needs of the new development should be provided in line with Local Plan policies. As designs and layout of the stations and the associated development are still to be confirmed, indicative locations are shown. Proposed open space provision would be likely to significantly enhance access to open space, and make a strong contribution towards the creation of healthy and sustainable communities. The promotion of an enhanced green infrastructure network would be likely to generate positive impacts in terms of flood risk, noise and air quality, through the introduction of additional urban drainage measures and urban greening.

Main policy alternatives - SP5.1: Open Space provision

Option 5.1a) Leave existing policy as in EAP 2015

Option 5.1b) Add in principles for open space

Sustainability Objectives	Options	Open Space Alternative Option 5.1a	Open Space Alternative Option 5.1b
1. To promote the provision of a range of high quality and affordable housing to meet local needs		0	0
2. To promote a healthy and safe community		+	++
3. To ensure access to local shopping, community and leisure facilities.		0	0
4. To tackle poverty and social exclusion		+-	++
5. To improve amenity by minimising the impacts associated with development.		+-	++
6. To conserve and improve open space provision and increase access to and enhancement of open space.		+	++
7. To improve local air quality and limit exposure.		+-	++
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		-	+
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		0-	0-
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		+-	+
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		0	0
12. To promote high quality and sustainable urban design.		+-	+
13. To protect and enhance the historic environment		0	0
14. To ensure new development makes efficient use of land, buildings and infrastructure.		+-	+-
15. To encourage and accommodate sustainable economic growth and employment opportunity.		0	0
16. To maximise the benefits of regeneration and development to promote sustainable communities.		0+	0+

Alternative Option SP5.1a) Leave existing policy as in EAP 2015

- 9.58 The existing policy in the 2015 EAP is situated within the Environment policy. There is limited guidance within the policy about what we expect to be delivered at Euston in terms of Open Space. The environmental and social benefits could be limited as when compared to preferred option.

Preferred option SP5.1b) Add in principles for open space

- 9.59 The addition of a separate Open Space policy allows further guidance to be given in the EAP about how we expect to see open space delivered. The proposed open space provision would be likely to significantly enhance access to open space, and make a strong contribution towards the creation of healthy and sustainable communities. The promotion of an enhanced green infrastructure network would be likely to generate positive impacts in terms of flood risk, noise and air quality, through the introduction of additional urban drainage measures and urban greening. The provision of open space on the northern half of the decking would lead to significant sustainability and environmental benefits, but is likely to require additional funding and we have been advised that this is unlikely to be forthcoming under current spending plans.

Conclusions: Open Space options

- 9.60 The introduction of a dedicated Open Space policy within the EAP Update reflects the strategic importance of open space in mitigating the environmental and social impacts of HS2 construction and the regeneration of the area. The preferred policy option (SP5.1b), which incorporates specific principles for open space provision, demonstrates significantly stronger alignment with sustainability objectives compared to retaining the 2015 policy (SP5.1a).
- 9.61 It supports healthier communities, enhances biodiversity, improves air and water quality, and contributes to climate resilience through green infrastructure and urban drainage. However, the full realisation of these benefits—faces financial constraints under current spending plans, with the reduction in decking and enabling for Over Site Development above the HS2 station and part of the tracks reducing the amount of land available for development. It is understood that open space proposed, on newly created land above the railway tracks is no longer part of HS2's proposals due to changes to the station ventilation strategy and cost savings.
- 9.62 An alternative location for re-provided open space is suggested in the spatial illustration., notwithstanding the reduction in available space and the Government's change in approach to funding the station at Euston, every possible attempt to accommodate open space within the overall Euston station and tracks masterplan will need to be made, after which alternative locations will need to be explored. Despite this, the policy direction clearly prioritises long-term environmental and community wellbeing, reinforcing the role of open space in the sustainable urban regeneration in Euston and with the inclusion of principles for open space helps to deliver this in a more cohesive and sustainable way.

Places

Development Principle EAP1: Euston Station and tracks

Development Principle EAP2: Euston Road

Development Principle EAP3: The Cutting

Sustainability Objectives	Options	Euston Station and tracks	Euston Road	Camden Cutting
1. To promote the provision of a range of high quality and affordable housing to meet local needs		++	0	+
2. To promote a healthy and safe community		+	+	+
3. To ensure access to local shopping, community and leisure facilities.		++	+	+
4. To tackle poverty and social exclusion		+-	+-	+-
5. To improve amenity by minimising the impacts associated with development.		+-	+-	+-
6. To conserve and improve open space provision and increase access to and enhancement of open space.		+	+	+
7. To improve local air quality and limit exposure.		--	--	--
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.		+-	+-	+-
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.		+-	0	0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.		-	0	0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area		+	+	0
12. To promote high quality and sustainable urban design.		+	+	+
13. To protect and enhance the historic environment		+-	+-	+
14. To ensure new development makes efficient use of land, buildings and infrastructure.		+	+-	+
15. To encourage and accommodate sustainable economic growth and employment opportunity.		++	+	+
16. To maximise the benefits of regeneration and development to promote sustainable communities.		+	+	+

Commentary

Euston Station and Tracks:

- 9.63 Euston station and tracks and the Cutting are linked in their delivery, with the main employment and retail growth taking place at Euston Station site, whilst the main residential development would be located to the rear of the station and at the Cutting. Therefore land use mix options for these sites are considered together. Together they would provide a balance of homes and jobs that would deliver strong benefits in terms of housing delivery and economic growth/ employment.
- 9.64 The space above and around the station and tracks is capable of accommodating a number of new homes, jobs, shops and spaces. Development will happen in phases with the potential for significant gaps between phases. In the early phases, development is expected around and above the stations (HS2 and NR) on Cobourg Street, Eversholt Street and to the north of Euston Square Gardens. In the longer term, development of the NR parcel deck could provide opportunities for more jobs, a public east west route above the stations and including the provision of a substantial, inclusive and accessible public open spaces which invites people up to the area above the stations.
- 9.65 The Euston Station and Tracks and Cuttings policy provides a balance of homes and jobs that would deliver strong benefits in terms of housing delivery and economic growth/ employment. There is potential for between 215,000sqm and approximately 370,000 sqm of employment floorspace with the priority being for the creation and retention of suitable floorspace for Knowledge Quarter growth sectors and education floorspace. The promotion of high-density, mixed-use development would enable efficient use of land, and would introduce growth in an area with excellent sustainable transport infrastructure. Whilst the number of new homes has decreased compared to the 2015 EAP (), this is largely because of the reduction in enabled land and the mix is considered the appropriate approach as explained in the assessment of the Land Use options.
- 9.66 The provision of additional retail, leisure and cultural facilities could enhance access to shopping, whilst the proposed significant enhancements to connectivity and mix of uses provided on the site would help to address social exclusion and promote regeneration by providing access to opportunities for local people both on the site and more widely.
- 9.67 A focus on high-quality design and public realm would generate significant urban design benefits. The policy includes reference to substantial inclusive and accessible open space to invite people above the station. New open space would have significant benefits for local communities and visitors. The supporting text of the policy highlights the need for appropriate measures to address surface water flood risk. The policy would also support the development of efficient and renewable energy supply.

Camden Cutting:

- 9.68 The anticipated extent of decking over the tracks has been reduced since the adoption of the EAP 2015. Engineering constraints and funding issues limit the extent of decking above the tracks. As a consequence decking is no longer anticipated above the tracks in the northern part of the railway cutting or above the tracks on the eastern side. Camden remains committed to decking in these areas and will work with partners to unlock this potential. The development potential of

the railway siding adjacent to Mornington Terrace has been assessed as having potential for additional heights (subject to detailed assessment of impacts and meeting development plan policies.

Alternative policy options for Euston Station

9.68 Alternative DP1.1: Seek a higher proportion of housing on the Euston Station and Tracks site.

Options	Euston Station & tracks Alternative DP1.1
Sustainability Objectives	
1. To promote the provision of a range of high quality and affordable housing to meet local needs	+-
2. To promote a healthy and safe community	-
3. To ensure access to local shopping, community and leisure facilities.	0
4. To tackle poverty and social exclusion	-
5. To improve amenity by minimising the impacts associated with development.	-
6. To conserve and improve open space provision and increase access to and enhancement of open space.	-
7. To improve local air quality and limit exposure.	-
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	-
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	0
12. To promote high quality and sustainable urban design.	0-
13. To protect and enhance the historic environment	0
14. To ensure new development makes efficient use of land, buildings and infrastructure.	++
15. To encourage and accommodate sustainable economic growth and employment opportunity.	0
16. To maximise the benefits of regeneration and development to promote sustainable communities.	+-

Alternative Option DP1.1: Seek a higher proportion of housing on the Euston Station and Tracks site.

- 9.69 In order to enable significant additional housing on the station site, additional density and height could be required. Testing shows that significant additional height and density could have significant harm to skyline of London and exceed the heights specified in the LVMF. Based on current information, there are also concerns about high enabling costs that would impact the amount of development and reduced returns and viability as the commercial element could be used to cross subsidise residential development.
- 9.70 This may not result positively in placemaking terms. It could bring about negative social impacts for local residents and result in levels of lower amenity and poorer conditions with less space and potentially funding for facilities and open space. It could also impact negatively on heritage assets. It is also recognised that there could be environmental negatives to taller buildings as they tend to use more energy and emit more carbon than lower rise equivalents. Please also see assessment of Land Use options.

Summary of Euston Station and Tracks options

- 9.71 The preferred development approach for Euston Station and Tracks supports a mix of housing and employment uses, promoting high-quality urban design, and enhances connectivity and access to local facilities. The inclusion of new open spaces and a focus on placemaking contribute positively to community wellbeing and long-term sustainability.
- 9.71 In contrast, the alternative option (DP1.1), which seeks a higher proportion of housing, presents notable weaknesses. While it may improve housing delivery, it would likely result in reduced amenity, environmental and heritage harm, and negative social impacts due to increased building height and density. These effects would undermine placemaking goals and conflict with strategic views and open space provision. Overall, the preferred option offers a more holistic and integrated response to the challenges and opportunities at Euston, supporting regeneration while maintaining environmental and social sustainability.

Main policy Alternatives – DP3: The Cutting

- 9.72 Option DP3.1: Retain housing numbers included in EAP 2015
 Option DP3.2: Reduce housing numbers based on reduction in enabled land
 Option DP3.3: Increase heights on certain remaining plots (up to approx. 12 storeys in certain locations) and include additional plots where feasible.

Options	The Cutting Alternative DP3.1	The Cutting Alternative DP3.2	The Cutting Alternative DP3.3
Sustainability Objectives			
1. To promote the provision of a range of high quality and affordable housing to meet local needs	++	0/+	+
2. To promote a healthy and safe community	++	+	+

Options	The Cutting Alternative DP3.1	The Cutting Alternative DP3.2	The Cutting Alternative DP3.3
Sustainability Objectives			
3. To ensure access to local shopping, community and leisure facilities.	++	+	+
4. To tackle poverty and social exclusion	+	+	+
5. To improve amenity by minimising the impacts associated with development.	+	0	0
6. To conserve and improve open space provision and increase access to and enhancement of open space.	--	0	+
7. To improve local air quality and limit exposure.	0	0	0
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	0	0	0
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	0	0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0	0	0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	++	+	+
12. To promote high quality and sustainable urban design.	-	+	+
13. To protect and enhance the historic environment	--	+	+
14. To ensure new development makes efficient use of land, buildings and infrastructure.	+	0	++
15. To encourage and accommodate sustainable economic growth and employment opportunity.	0	0	0
16. To maximise the benefits of regeneration and development to promote sustainable communities.	+	+	+

Commentary options DP 3.1 and DP 3.2

- 9.73 Due to cost constraints, it is understood that the majority of land above the Network Rail tracks in the Cutting would no longer be enabled, nor would the open space which was included in the EAP 2015 to the north of the Cuttings (subject to affordability).
- 9.74 All options would enable the efficient use of land, by proposing the positive use of new land on a deck above existing railway tracks, maximising potential for new homes, Camden's priority land use. In terms of design and historic environment, the proposals for this area could lead to an improved and better connected urban realm (with positive buildings instead of blank railway tracks), but also potential impacts on neighbouring historic terraced housing, which would need to be carefully managed through high quality design. The proposals for the area could bring benefits in terms of social exclusion through the enhanced connectivity that would result from the new route across site.

Given the reduction in enabled land, option DP 3.1 would require significant additional height on the remaining plots in order to achieve the same housing numbers, which would be unsympathetic to the local context and which would have a harmful impact on local views and potentially the LVMF. It is also likely that proposed open space would be unable to be delivered as the sites would need to be used for housing delivery.

While option DP 3.1 is not considered feasible because of the unacceptable harm it would be likely to cause to heritage assets, option DP3.3 includes additional capacity for housing when compared to option 3.2. The option includes a potential development plot located above the siding which could provide residential development subject to viability testing. Landowners have indicated that they are interested in taking this site forward. The site could enable development to face existing housing and complete a two sided street. The option also identifies greater capacity for housing through an increase in proposed heights in certain locations.

Option DP3.2 would deliver similar benefits to option DP 3.3 in enhancing connectivity and making better use of under-utilised land. It may also provide some benefits in terms of urban design by delivering buildings at a lower density in a sensitive historic context. However, this option may not make as effective use of land by failing to maximise new homes, which are much needed in the borough. It may also play a lesser role in enabling an optimum balance of uses between the Euston Station and Tracks site and the North Euston Cutting, by delivering fewer homes to balance with employment led mixed uses on the station/ tracks site. Lower density development is likely to be more challenging to deliver which means that in deliverability terms option DP 3.3 would appear to be more realistic.

Euston Road:

- 9.36 The EAP 2015 seeks that Euston Road will be transformed to provide a safer, inclusive street environment to align with the principles from the Euston Healthy Streets project. This will involve the provision of a redesigned bus facility and improved public realm and road crossings to provide a more attractive and vibrant street. The update does not propose to change this overall objective but it did consider options for how this could be secured.

Alternative policy options

9.37 Alternative DP2.1: More stringent in relation to reducing traffic as part of enhancing the environment for pedestrians and cyclists

Alternative DP2.2: Do not seek to redress the balance between motorised transport and walking/ cycling along Euston Road

Sustainability Objectives	Euston Road Alternative DP2.1	Euston Road Alternative DP2.2
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0	0
2. To promote a healthy and safe community	++	--
3. To ensure access to local shopping, community and leisure facilities.	++	--
4. To tackle poverty and social exclusion	+	-
5. To improve amenity by minimising the impacts associated with development.	++	--
6. To conserve and improve open space provision and increase access to and enhancement of open space.	++	--
7. To improve local air quality and limit exposure.	++	--
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	0	0
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0	0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	++	--
12. To promote high quality and sustainable urban design.	++	--
13. To protect and enhance the historic environment	0	0
14. To ensure new development makes efficient use of land, buildings and infrastructure.	0	0
15. To encourage and accommodate sustainable economic growth and employment opportunity.	0	0
16. To maximise the benefits of regeneration and development to promote sustainable communities.	++	--

Alternative Option DP2.1 More stringent in relation to reducing traffic as part of enhancing the environment for pedestrians and cyclists;

- 9.38 This alternative would be likely to generate significant positive sustainability outcomes in relation to urban design by reducing traffic dominance, enhancing the public realm and the setting of heritage assets, including listed buildings. Reduced traffic dominance would also be likely to improve access to facilities, and to help reduce noise and air pollution from vehicles. Enhanced pedestrian accessibility and public realm would also be likely to generate positive impacts in relation to poverty/exclusion and regeneration.
- 9.39 This alternative would also be likely to generate both positive and negative outcomes against some sustainability indicators. In relation to health and safety, reduced traffic dominance could enhance the safety of pedestrians and cyclists, as well as improving air quality. However, if there were still strong demand on Euston Road from private vehicles, including from freight, this could create potential conflict, and may result in traffic simply being displaced onto other roads in the area. Further mitigation measures and policies may need to be implemented to ensure an appropriate performance of the network.
- 9.40 Alternative DP3.1 is likely to generate economic growth benefits by enhancing the appearance and function of the Euston area, but could have some negative economic impacts by reducing the road capacity, for instance by leading to longer journey times for freight journeys. Nonetheless, such an impact could be mitigated with introduction of alternative freight management policies that may include re-timing, re-routing and consolidation centres. In relation to private motorised transport, this alternative would be likely to be positive outcomes by promoting walking and cycling, while making private car use less attractive.
- 9.41 Overall, this alternative has the potential to deliver on the objectives of the Mayors Transport Strategy (MTS) and Camden's Transport Strategy (CTS) faster than with the central policy scenario.

Alternative Option DP2.2 Do not seek to redress the balance between motorised transport and walking/ cycling along Euston Road:

- 9.42 This alternative would be likely to generate significant negative sustainability outcomes in relation to urban design by failing to address traffic dominance and public realm issues. A failure to address traffic dominance would mean that Euston Road would continue to act as a barrier for communities either side of the road, and current noise and air pollution problems would remain.
- 9.43 Increased traffic dominance, which is likely to be driven in part by growth in freight trips in the coming decades, is likely to increase pedestrian and cyclist collisions along Euston Road if not mitigated. Furthermore, not discouraging traffic from Euston Road may lead to increased congestion which would like have negative outcomes on some sustainability indicators such as those related to air quality.
- 9.44 Alternative DP2.2 is unlikely to generate additional economic growth benefits and likely to impact the attractiveness of the knowledge-based institutions located in the area. This could have an overall negative impact on economic growth.
- 9.45 Overall, this alternative would present a setback on the delivery of MTS and CTS objectives leading to a delay in in the realisation of both policy documents.

Places (2):

Development Principle EAP 4: Drummond Street & Hampstead Road

Development Principle EAP 5: Regents Park Estate

Development Principle EAP 6: Ampthill & Mornington Crescent

Development Principle EAP 7: West Somers Town

Options Sustainability Objectives	EAP4: Drummond Street and Hampstead Road	EAP5: Regents Park Estate	EAP6: Ampthill and Mornington Crescent station	EAP7: West Somers Town
1. To promote the provision of a range of high quality and affordable housing to meet local needs	++	++	+	+
2. To promote a healthy and safe community	++	+	+	+
3. To ensure access to local shopping, community and leisure facilities.	++	+-	0	++
4. To tackle poverty and social exclusion	+	+-	0	+
5. To improve amenity by minimising the impacts associated with development.	+	+	0	+
6. To conserve and improve open space provision and increase access to and enhancement of open space.	+	+-	0	+
7. To improve local air quality and limit exposure.	+	+	0	0
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	0	+	+	0
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	0	0	0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0	0	0	0

Options Sustainability Objectives	EAP4: Drummond Street and Hampstead Road	EAP5: Regents Park Estate	EAP6: Amphill and Mornington Crescent station	EAP7: West Somers Town
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	+	+	+	+
12. To promote high quality and sustainable urban design.	+	+	+	+
13. To protect and enhance the historic environment	0	0	0	0
14. To ensure new development makes efficient use of land, buildings and infrastructure.	+	+	+	+
15. To encourage and accommodate sustainable economic growth and employment opportunity.	0	+	0	0
16. To maximise the benefits of regeneration and development to promote sustainable communities.	+	+	+	+

Drummond Street:

- 9.50 This principle has been updated to reflect the demolished buildings as a result of HS2 construction and the relocation of Maria Fidelis School. New open space in the area would contribute to significant benefits for local communities. New guidance is added on the redevelopment of the former Maria Fidelis site, including on use, massing, routes and open space. There is additional emphasis added to maximize opportunities to encourage a more sustainable transport along and across Hampstead Road, including cycle lanes and improved pedestrian crossings. Further details are included in the principle about managing the impact of taxis and private hire vehicles (PHVs) to ensure that vehicle movements do not negatively impact on pedestrians or cyclists.

Alternative policy options

- 9.51 DP4.1: Do not create a pedestrian and cyclist priority area around Drummond Street
- DP4.2: Redevelop Maria Fidelis school site exclusively for employment use (not housing and open space)

Sustainability Objectives	Drummond St Alternative DP4.1	Drummond St Alternative DP2.2
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0	--
2. To promote a healthy and safe community	-	-
3. To ensure access to local shopping, community and leisure facilities.	-	0
4. To tackle poverty and social exclusion	-	-
5. To improve amenity by minimising the impacts associated with development.	-	--
6. To conserve and improve open space provision and increase access to and enhancement of open space.	-	--
7. To improve local air quality and limit exposure.	-	0
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	--	0
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0	0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	--	0
12. To promote high quality and sustainable urban design.	--	--
13. To protect and enhance the historic environment	0	0
14. To ensure new development makes efficient use of land, buildings and infrastructure.	0	0
15. To encourage and accommodate sustainable economic growth and employment opportunity.	--	+
16. To maximise the benefits of regeneration and development to promote sustainable communities.	-	0

Alternative option DP4.1: Do not create a pedestrian and cyclist priority area around Drummond Street

- 9.52 Given the potential increase in traffic levels in the Euston area following the arrival of HS2, vehicular movements through the area could have a significant impact on the Drummond Street area. Significant negative sustainability impacts identified against the SA criteria are:

- Economic growth and employment: traffic dominance could have a significant impact on the Drummond Street neighbourhood centre and its local businesses.
- Regeneration and sustainable communities: a potential significant rise in traffic levels could start to create a separation between the two sides of the street and consequently have an impact on the role of the street as a key hub of local activity.
- Noise and air quality: increases in traffic could generate noise and air pollution from vehicles, although the designation of Euston as an ultra-low emissions zone could reduce this potential impact.

Alternative option DP4.2: Redevelop Maria Fidelis school site exclusively for employment use (not housing and open space)

- 9.53 The 2015 EAP identifies this site as a potential location for the re-provision of St James Gardens which was lost to HS2 works, the impacts of which were assessed and reported in HS2's Environmental Statement with a view to mitigating the loss elsewhere on land controlled by HS2 Ltd.
This option could contribute to jobs growth by delivering employment space In which case it would not contribute to addressing a shortage of open space and homes in the area..
- 9.54 With the concentration of economic activity at the station site, the development of this site offers the opportunity provide much needed housing and transition between the two character areas. Considering land uses overall, and the need for housing, this site would deliver much greater sustainability benefits with the mixed use option in the plan.

Regents Park Estate:

- 9.55 The proposed principle has been updated to take account of the HS2 construction on and immediately adjacent to the site. There would likely have significant benefits in terms of providing new and refurbished housing for the existing communities. Over 100 homes have already been reprovided on the estate as part of HS2 mitigation. The Strategy seeks to improve accessibility issues by enhancing connections and improving open space provision. An estate wide open space strategy which is developed in conjunction with redevelopment proposals is recommended to ensure that the impacts on open space and public realm are minimised and replacement/enhancement potential is maximised. Additional development on the Estate is likely to have some negative impacts for existing residents who have already suffered from the impacts of HS2 construction and residents that may need to move from their homes as well as businesses on Stanhope Parade, although they could be reprovided as part of the development. The re-provision of the Regents Park Childrens Centre could provide temporary negative social impacts for local residents, although this should be managed through phasing and the delivery of the new centre before the closure of the existing. Overall there could be positive benefits of the new facility which could be designed in conjunction with the centre to meet their needs a provide a new facility

for users, helping to support health and well-being. Positive environmental benefits for the Regents Park Estate include references to exploring use of waste heat from nearby station infrastructure.

Alternative policy options

- 9.56 Alternative DP5.1: Do not seek to address routes through Regent's Park Estate
Alternative DP5.2: Less growth and change on Regent's Park Estate

Sustainability Objectives	Regents Park Estate Alternative DP5.1	Regents Park Estate Alternative DP5.2
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0	0
2. To promote a healthy and safe community	--	0
3. To ensure access to local shopping, community and leisure facilities.	-	-
4. To tackle poverty and social exclusion	--	-
5. To improve amenity by minimising the impacts associated with development.	-	-
6. To conserve and improve open space provision and increase access to and enhancement of open space.	-	--
7. To improve local air quality and limit exposure.	-	--
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	0	0
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0	0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	-	--
12. To promote high quality and sustainable urban design.	--	--
13. To protect and enhance the historic environment	0	0
14. To ensure new development makes efficient use of land, buildings and infrastructure.	0	0
15. To encourage and accommodate sustainable economic growth and employment opportunity.	0	0

Sustainability Objectives	Regents Park Estate Alternative DP5.1	Regents Park Estate Alternative DP5.2
16. To maximise the benefits of regeneration and development to promote sustainable communities.	--	--

Alternative option DP5.1: Do not seek to address routes through Regent's Park Estate

- 9.57 This option was assessed in the SA for the 2015 EAP and would still be likely to generate a number of negative outcomes when compared to the preferred approach. Whilst there have been some improvements in routes and green spaces improvement with the HS2 housing mitigation schemes built on the estate, there are still accessibility issues remaining. Not addressing routes through the estate would mean that existing accessibility and legibility issues remain. Some routes currently experience limited overlooking, compromising pedestrian safety. The current layout creates a disjointed urban form in some places which reduces the quality of the public realm and the efficiency of the urban layout. These issues would not be addressed under this option.

There may be some benefit from this option in terms of noise generation, as improved legibility of the road network leads to an increase in traffic through the residential estate. However, the improvement of (and an emphasis on) active travel pedestrian and cycling links and the public realm could also serve to reduce car use in the area.

Alternative option DP5.2 Less growth and change on Regent's Park Estate

- 9.58 This could generate a negative impact in relation to housing as it would result in the delivery of less homes, including affordable homes, which are needed to meet needs. This option would also reduce the potential for new infill to provide greater overlooking and in some cases a re-arrangement of the public realm, thus failing to take opportunities to enhance community safety. New development and infill could be used to enhance the legibility of the estate, creating a safer and higher quality public realm, thus increasing the benefits of regeneration and delivering urban design benefits: this option would fail to achieve this, instead retaining the current issues in relation to public realm. This option would also fail to ensure efficient use of land in an area with good public transport links.
- 9.59 There would be some positive sustainability impacts in terms of less redevelopment on the estate as it would reduce the amount of demolition work, thus reducing the amount of waste material and disruption to residents.

Ampthill and Mornington Crescent

- 9.60 The Principle has changed since the 2015 EAP to reflect the reduced capacity for potential new housing along the railway cutting. References to the bus stand facilities at Barnby Street have been removed. A new site allocation at Ampthill Estate railway edge has been added to the policy. Recognising the Central

Government focus on delivering more housing in Euston, this chapter includes reference to the potential for further sites to be identified for housing, and notes that the Council will work closely with partners and communities to explore various options for delivering longer term housing-led regeneration in and around Amptill Estate.

Alternative policy options

9.61 Alternative DP6.1: Less growth and change on Amptill – reduced further due to substation removal

Alternative DP6.2: More growth and change on Amptill

Sustainability Objectives	Amptill and Mornington Crescent Alternative DP6.1	Amptill and Mornington Crescent Alternative DP6.2
1. To promote the provision of a range of high quality and affordable housing to meet local needs	0	+
2. To promote a healthy and safe community	0	+
3. To ensure access to local shopping, community and leisure facilities.	0	+/-
4. To tackle poverty and social exclusion	+	+
5. To improve amenity by minimising the impacts associated with development.	0	0
6. To conserve and improve open space provision and increase access to and enhancement of open space.	+	+/-
7. To improve local air quality and limit exposure.	0	0
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	0	0
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	0	0
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	0	0
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	+	+

12. To promote high quality and sustainable urban design.	+	+
13. To protect and enhance the historic environment	0	0
14. To ensure new development makes efficient use of land, buildings and infrastructure.	0	+
15. To encourage and accommodate sustainable economic growth and employment opportunity.	0	0
16. To maximise the benefits of regeneration and development to promote sustainable communities.	0	+

Alternative option DP6.1: Less growth and change on Ampthill – reduced further due to substation removal

- 9.62 This option would fail to utilise opportunities to make better use of under-utilised land to provide additional housing, or to address existing issues relating to the layout and form of the estate, which impacts on the quality of the local environment, accessibility through the area, overlooking, and the safety of the public realm and designated public open space. There could be benefits in this option in relation to noise impacts as it would avoid providing additional housing next to the railway line and reduce impacts on existing communities.

Alternative option DP6.2: More growth and change on Ampthill

- 9.63 This option could create positive impacts including making more efficient use of land through creating higher densities of housing, in an area with good public transport connections. Greater intervention would also provide the potential to further increase the accessibility and legibility of the estate and help to address some of the existing concerns. There could be negative impacts for the existing residential community due to potential increases in the level of disruption on the community.

West Somers Town

- 9.64 There were significant alternatives considered for West Somers Town within the previous Sustainability Appraisal. Since the adoption of the EAP in 2015, the Maria Fidelis Lower School has now been re-located to Drummond Crescent thus enhancing access to community facilities and supporting regeneration which has given significant positive impacts for the local community. Central Somers Town is a regeneration project led by Camden's Community Improvement Programme that has already delivered a host of new improvements including new housing, a new school, access to jobs and training and new open space.

The Churchway Estate is being retained in the EAP as an opportunity site for renewal and intensification and was assessed previously in the SA 2015 with opportunities to be explored with residents and the local community. There is a significant amount of designed further study to be explored in partnership with residents, in order to maximise social value for this site.

10. Site Allocations options

- 10.1 All site allocations have sought to make the most efficient use of land and buildings available in accordance with established policy. The process of identifying site options began in 2021 with site options identified from existing and emerging plans (including the Camden Site Allocations Plan 2013, EAP 2015 and Camden Local Plan 2017); the London Strategic Housing Land Availability Assessment 2017; planning applications; and a Call for Sites. The Call for Sites was advertised on the EAP website with a map to identify any additional sites in the Euston area that could have the potential for development (for housing and economic purposes). In total 1 additional site was identified through the Call for Sites exercise (250 Euston Road).
- 10.2 The sites identified were then subject to a staged sifting process. This involved:
- Stage 1 – Site eligibility check. Key considerations here included: will the site deliver 10 or more homes or additional 1,000 sqm floorspace? is construction advanced? is the site within the borough?
 - Stage 2 - Basic site suitability and high level availability check. Key considerations here included: will the site be available for development within the plan period? are there any policies or designations that would prevent the site from being developed?
 - Stage 3 - Detailed site suitability and sustainability check. Key considerations here included: is the site suitable for the development proposed? what are the main issues and opportunities? is there a need for guidance to ensure the site helps to address local needs and priorities? and initial appraisal against the objectives in the SA Framework.
 - Stage 4 - Achievability check. Key considerations included: are developers interested in developing the site within the plan period?
- 10.3 All potential sites that passed Stage 3 of the assessment process detailed above were considered to be suitable for redevelopment and taken forward to Stage 4.
- 10.4 Where sites were identified as being potentially suitable for housing, the capacity of these sites was then assessed. Housing capacities were identified based on design-led site capacity work, which has been undertaken in line with Local Plan, London Plan guidance and tested policy compliant mixes.
- 10.5 The starting point for this design-led capacity work has been to model a scheme that is based on the retention and extension of the existing building, rather than to assume that the existing building will be demolished (either in part or in full), in accordance with Policy CC2 (the Retention of Existing Buildings) of the Camden Local Plan Proposed Submission Draft. However, where a demolition scheme would clearly constitute the best use of a site and would significantly increase capacity then a pragmatic approach has been taken and a scheme involving demolition has been modelled to ensure site capacity is optimised.

- 10.6 This process lead to 14 sites being published for consultation in the Supplementary Consultation on the Euston Area Plan in September 2024. Other sites were discounted for clear reasons as set out in Appendix D of this SA report and are not considered to represent reasonable alternatives.
- 10.7 As part of the Supplementary consultation in September 2024 a further call for sites took place. One site was submitted from the 2024 consultation and is considered appropriate to take forward through all stages to stage 4 (Euston Square Hotel 152 – 156 North Gower Street).
- 10.8 The two sites (250 Euston Road and Euston Square Hotel) are considered appropriate to take forward as part of the preparation of the draft Euston Area Plan Update.
- 10.9 The below table highlights the sites that will be taken forward as part of the Euston Area Plan Update Regulation Submission Draft along with how the sites were identified.

EAP reference	Site name	Site identification source/s
EA1	Euston Station	Allocated in EAP 2015 and draft EAP Update 2023
EA2	Royal Mail, 1 Barnby Street	Allocated in draft EAP Update 2023
EA3	The Place and Premier Inn, Euston Road	The Place dance school contacted the Council as they are looking for a new home in the Camden Area. Part draft allocated in draft EAP Update 2023
EA4	250 Euston Road	Call for Sites 2021 and publicised in 2024 Supplementary consultation
EA5	Euston Square Hotel, North Gower Street	Call for Sites 2024
EA6	Cutting at Park Village East	Part of site previously allocated in EAP 2015 and draft EAP Update 2023 and supplementary consultation 2024
EA7	Granby Terrace Bridge/Hampstead Road	Previously allocated in EAP 2015 and draft EAP Update 2023 and supplementary consultation 2024
EA8	Cutting at Mornington Terrace	Previously allocated in EAP 2015 and draft EAP Update 2023 and supplementary consultation 2024
EA9	Former Maria Fidelis School	Previously allocated in EAP 2015 and draft EAP Update 2023 and supplementary consultation 2024.
EA10	Regents Park Estate North	Part allocated in EAP 2015 and draft EAP Update 2023 (Cartmel, Coniston and Langdale) and publicised Supplementary consultation 2024
EA11	Capital City College, Longford Street	Previously allocated in EAP 2015 and draft EAP Update 2023 and publicised Supplementary consultation 2024

EA12	Surma Centre, Robert Street	Previously allocated in EAP 2015 and draft EAP Update 2023 and publicised in Supplementary consultation 2024
EA13	Amphill Estate Railway Edge	Previously allocated in draft EAP Update 2023

10.10 The SEA Regulations require that the alternative site allocations considered for inclusion in a plan that must be subject to SA are 'reasonable', therefore alternatives that are not reasonable do not need to be subject to appraisal.

10.11 There are 13 sites are suggested in the EAP Update to be allocated. The majority of the sites which are allocated would deliver new homes, as self-contained housing is the priority land-use in the Local Plan. Additional uses proposed include Capital City College (EA11) which may be redeveloped to re-provide educational use or provide a mixed use of residential and educational use, Amphill Estate Railway Edge (EA13) and the Surma Centre (EA12) which may be redeveloped to re-provide community centres with housing and Euston Square Hotel (EA5) which has the potential to extend the hotel with some additional housing.

10.12 250 Euston Road (EA4) may be redeveloped to provide new homes as well as to enhance workspace provision. There is potential for some new homes as part of a mixed use and transport infrastructure redevelopment at Euston station (EA1). The Royal Mail site (EA2) would provide some new housing as part of a mixed use development and reprovided commercial floorspace. Regents Park North (EA10) would re-provide housing, new housing and a replacement Children's Centre.

10.13 The redevelopment of 'The Place'/ Premier Inn site allocation (EA3) will only be possible should The Place (an existing cultural use) be able to relocate. The existing social homes on the Premier Inn site would need to be reprovided and a mixed use development will be expected to be delivered to optimise the provision of additional homes.

10.14 The Cuttings sites at Park Village East (EA6), Granby Terrace bridge/Hampstead Road (EA7), Mornington Terrace (EA8), and the former Maria Fidelis site (EA9) would all be housing led developments.

10.15 The tables below assess the site allocations against the sustainability objectives.

Site allocation ref	EA7 Granby Terrace Bridge/Hampstead Road	EA6 Cutting at Park Village East	EA5 Euston Square Hotel, North Gower Street	EA4 250 Euston Road	EA3 The Place and Premier Inn, Euston Road	EA2 Royal Mail, 1 Barnby Street	EA1 Euston station	Sustainability Objectives
	++	++	+-	+-	++	++	+-	1. To promote the provision of a range of high quality and affordable housing to meet local needs
	+	+	+	+	+	+	+	2. To promote a healthy and safe community
	0	0	0	0	0	+	++	3. To ensure access to local shopping, community and leisure facilities.
	+-	+-	+-	+-	+-	+-	+-	4. To tackle poverty and social exclusion
	+-	+-	+-	+-	+-	+-	+-	5. To improve amenity by minimising the impacts associated with development.
	++	0	0	0	0	++	++	6. To conserve and improve open space provision and increase access to and enhancement of open space.
	+-	+-	+-	+-	+-	+-	+-	7. To improve local air quality and limit exposure.
	+-	+-	+-	+-	+-	+-	+-	8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.
	+	+	+	+	+	+	+-	9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.
	+-	+-	+-	+-	+-	+-	+-	10. To protect and enhance existing habitats and biodiversity

and to seek to increase these where possible.							
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	++	+	+	+	+	+	+
12. To promote high quality and sustainable urban design.	++	++	++	++	++	++	++
13. To protect and enhance the historic environment	+ -	+ -	+ -	+	+	+	+ -
14. To ensure new development makes efficient use of land, buildings and infrastructure.	++	++	++	++	++	++	++
15. To encourage and accommodate sustainable economic growth and employment opportunity.	++	+	0	+	+	0	0
16. To maximise the benefits of regeneration and development to promote sustainable communities.	++	++	++	++	++	++	++

Site allocation	EA13 Amphrhill Estate Railway Edge	EA 12 Surma Centre	EA11 Capital City College	EA 10 Regents Park Estate North	EA9 Former Maria Fidelis School	EA8 Cutting at Mornington Terrace	Sustainability Objectives
	++	++	+-	++	++	++	
	+	+	+	+	+	+	
	+	+	0	0	0	0	
	+-	+-	+-	+-	+-	+-	
	+-	+-	+-	+-	+-	+-	

6. To conserve and improve open space provision and increase access to and enhancement of open space.	++	++	0	0	0	0
7. To improve local air quality and limit exposure.	+-	+-	+-	+-	+-	+-
8. To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	+-	+-	+-	+-	+-	+-
9. To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk.	+	+	+	+	+	+
10. To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	+-	+-	+-	+-	+-	+-
11. To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	+	+	+	+	+	+
12. To promote high quality and sustainable urban design.	++	++	++	++	++	++
13. To protect and enhance the historic environment	+-	+-	+-	0	0	0
14. To ensure new development makes efficient use of land, buildings and infrastructure.	++	++	++	++	++	++
15. To encourage and accommodate sustainable economic growth and employment opportunity.	0	++	0	+	+	0
16. To maximise the benefits of regeneration and development to promote sustainable communities.	++	++	++	++	++	++

Appraisal findings

10.16 All site allocations seek to maximise the benefits of regeneration and promote sustainable communities. Some of the sites such as Euston Station and the sites on Euston Road will form part of a mixed-use redevelopment schemes therefore would not necessarily maximise the provision of housing and affordable housing compared to if the site was developed solely for residential development. However, within the

existing policy constraints and in order to provide an appropriate mix of uses they could meet a number of the other sustainability objectives, including maximising the benefits of regeneration

- 10.17 There are a large number of site allocations which include requirements to enhance, and in some cases increase, open space, including in the Euston area where there is a known local need. Key site allocations that will contribute to the delivery of open space, and are therefore predicted to have a positive effect against this objective, include the former Maria Fidelis site, Railway Cutting at Park Village East and Euston station.
- 10.18 A number of the site allocation policies promote active travel and support the delivery of social and community infrastructure, which is likely to have a positive effect on health. Examples include the Euston Station site which is providing a significant infrastructure project with new routes through the site as well as other sites such as Amptill Estate railway edge and Regents Park North which would reprovide Community facilities.
- 10.19 Assessing the Euston site allocations against the Sustainability Appraisal objectives demonstrates a strong overall alignment. Most sites show consistent positive or strong positive contributions across key areas such as affordable housing provision, healthy communities, sustainable urban design, efficient land use and economic growth. However, there are notable gaps in certain objectives such as access to shopping, community, and leisure facilities with several sites scoring neutral (0), indicating limited contribution.

11. CUMULATIVE IMPACTS

- 11.1 Cumulative impacts is the term used to describe the impacts that can occur as a result of more than one plan or programme being implemented together. Its purpose is to identify where cumulative impacts could create new impacts that have not been identified during the SA of the AAP or would combine to create a significant impact that was previously not significant, or an impact of a different magnitude.
- 11.2 This SA has assumed that the EAP Update and the Camden Local Plan (and other Camden Development Plan documents) would be implemented. It has also assumed that the other Supplementary Planning Documents have been implemented in support of the Local Plan policies.
- 11.3 The Euston Area does not exist in isolation and is part of the London Borough of Camden. Development within the Borough and in neighbouring boroughs will result in cumulative effects, for example through the generation of additional traffic. The Council will therefore continue to work closely with its neighbours and the Greater London Authority to make sure that plans are co-ordinated to provide an integrated approach to maintaining and enhancing quality of life for residents, workers and visitors, and to ensure that a high quality and resilient environment is created.
- 11.4 Outside of the Camden Local Plan there is also the potential for cumulative impacts with neighbouring authorities and their planning policies / development aspirations. These are set out in the table below:

Table 5 Cumulative impacts

Cumulative impact	Receptor	Comment and mitigation measures
Increased housing provision in the Euston area	Sectors of the housing market in adjacent areas that are unable to find suitable housing types.	This will add to the overall stock of housing in central and inner London which could be beneficial, particularly in areas where the average house prices are high for London.
Greater employment opportunities	People of working age in adjacent boroughs. Economic Growth	By promoting the regeneration of currently under used sites (as set out in the proposals for the opportunity sites) there should be greater job opportunities and over the long term with potentially greater benefits from economic growth.
Adverse impact on adjacent services and facilities	Existing and future users of adjacent services and facilities	If the size and structure of the residential population in the Euston area changes (above and beyond the level of growth envisaged in the Camden Local Plan) there is the potential for increased demands on adjacent services which could impact on the quality and availability of these services. The EAP Update seeks to ensure that the provision of, or contributions towards, services is provided as part of development. The Mayor, LBC and other delivery partners should continue dialogue to ensure that appropriate facilities and services are in place should the demand require them.
Increased pressure on adjacent open spaces	Existing and future users of adjacent open spaces	An increased residential population, together with the loss of open space as a result of HS2 will lead to an increased pressure on adjacent open spaces. The EAP Update plans for the provision of new, replacement or improved open space as part of growth and change, in order to mitigate this.
Disruption caused by overall levels of growth and change (development and transport infrastructure)	Local residents and businesses	Significant development, growth and change at Euston resulting from the construction of HS2, potentially Crossrail 2 and over and adjacent station development also within the context of the other development sites nearby outside the EAP area could impact on neighbouring residential

		<p>communities, including Somers Town and Regents Park Estate and Amptill Estate.</p> <p>The EAP seeks to manage these issues and balance growth with protecting the amenity of local residents and viability of local businesses in a variety of ways including:</p> <ul style="list-style-type: none"> • managing movement and transport provision to minimise impacts including the promotion of sustainable and active travel as lower impact alternatives (e.g. walking and cycling, and sustainable/ low impact freight movement) • ensuring that buildings are sensitive to context and the amenity of neighbouring residents • the protection and promotion of Drummond Street <p>and maximising opportunities for local communities to benefit from change through affordable housing provision and employment opportunities.</p>
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12. CONCLUSIONS AND MONITORING

Overall assessment

- 12.1 This SA Report has been prepared to accompany the Regulation 19 consultation for the Euston Area Plan Update Proposed Submission Draft. The SA has identified the significant environmental, social and economic impacts that could emerge from the EAP Update. This is in line with the SEA Regulations, National Planning Policy Framework and good practice set out in the Planning Practice Guidance.
- 12.2 Overall the Sustainability Appraisal process has demonstrated that the EAP update would deliver positive or uncertain sustainability impacts in relation to the SA criteria. This would mean positive social, economic and environmental outcomes for the Euston area. The key outcomes are very similar to the SA for the 2015 EAP:
- The Update to the Plan would generate strongly positive impacts in terms of delivering new housing and affordable housing and promoting economic growth (noting a reduction from the adopted plan due to constraints). In doing so, the proposed strategy seeks to make efficient use of land by making better use of under-utilised sites across the Plan area.
 - The Update to the Plan would have positive social and environmental impacts through additions to the land use strategy which highlight more explicitly the need to ensure that the new development contributes to

reducing inequalities and increasing life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed, maximising social value and addressing concerns around safety and security. A new open separate space chapter which would improve public realm and would enhance access to open spaces for local communities across the area and help to promote health and wellbeing and ensure safety and security for communities.

- New mixed uses and substantial improvements to the station would provide economic opportunities, and the EAPs emphasis on involving local people in these opportunities would be likely to generate positive regeneration and social inclusion outcomes, as would the provision of new affordable homes and community facilities.
- The Plan would be likely to generate significant positive outcomes in relation to urban design by seeking opportunities to repair the urban grain to significantly enhance the public realm, and improve the urban environment wherever possible.
- The Plan seeks to address flood risk, air quality and biodiversity through its approach to green infrastructure, which would be used to mitigate each of these issues.
- The Plan includes a revised Environment policy combined with policies in the Camden Local Plan Proposed Submission Draft to address the Climate Emergency to include maximising resource efficiency and promoting energy efficiency to deliver a net zero carbon development. It highlights Euston specific challenges and opportunities such as exploring capturing excess heat from stations and a local off-set fund.

12.3 The main negative sustainability impacts picked up in the SA process are similar to those picked up in the previous SA:

- Potential noise to new dwellings proposed next to railway tracks. This is addressed where appropriate in each section, to ensure appropriate mitigation is delivered through the development delivered.
- The Plan could have some negative impacts on the historic environment in terms of new development affecting the setting of listed buildings.
- Ongoing construction impacts: whilst the assessment indicates that the overall sustainability outcomes of the proposed approach is positive, there is a need for an appropriate package of measures to address impacts on affected residents in terms of air pollution, noise and vibration who have already had hugely adverse impacts already. Some of this is covered by HS2 Assurances which include the "noise insulation programme" providing secondary glazing, ventilation, and blinds to eligible homes, and the "Code of Construction Practice (CoCP)" with measures like quiet equipment and screening during construction. Residents with significant noise disruption may be offered cash compensation or temporary re-housing by HS2.
- Finally the ambiguity around the masterplan and station design for the area mean that plans are unknown and specific impacts of development can not be quantified.

How has SA process influenced the review of the EAP?

12.4 The production of the Euston Area Plan and Sustainability Appraisal have been carried out in an iterative way, enabling the outcomes of the appraisal to be fed into the draft update to the Euston Area Plan objectives, policies and area based principles. Key ways in which the Sustainability Appraisal process has informed the approach taken to the Euston Area Plan include:

- Recommendations made regarding adjustments to the Objectives, in order to ensure that they address the full range of sustainability factors. These have been incorporated into the revised objectives contained in the draft updated Plan;
- Informed the decision making process regarding the strategic options for the Euston Area Plan (including the strategic alternatives assessed in Section 8 above and the assessment of main policy alternatives, which is provided in Section 9).
- Highlighted the importance of specific issues where growth could affect the environment, for example in relation to noise, air quality, flooding and biodiversity. This has led to relevant measures being incorporated into the Euston Area Plan where appropriate, in particular informing the proposal for a green infrastructure network to address these issues on an area wide basis.

Monitoring the significant effects of the EAP

12.5 The SEA Regulations require that “the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action” and that the environmental report should provide information on “a description of the measures envisaged concerning monitoring”.

12.6 Section 5 of the EAP Update will enable the significant effects of implementing the EAP to be monitored. A principal tool in the monitoring process will be the Camden Annual Monitoring Report or equivalent, which assesses progress for a range of areas, including environmental factors such as air quality, biodiversity waste and renewable energy generation; employment and town centres, housing delivery and transport.

APPENDICES

Appendix A – Table showing responses to scoping consultation

Appendix B - List of criteria and potential indicators relative to each SA objective

Appendix C- Compliance with SEA Directive/Regulations

Appendix D – Sites considered but not allocated

Appendix E – Updated Plans and programmes

Appendix F - Updated baseline data (separate document to be published with the EAP update)

DRAFT

APPENDIX A: Summary table of consultation responses following Scoping Report Consultation

Euston Sustainability Appraisal Scoping Report 2021 Statutory consultee responses

Consultee	Comment	Action for EAP Sustainability Appraisal
<u>Environment Agency</u>	There are no major environmental constraints on site that would cause us concern.	Noted. No action required
	We are pleased that you have identified a number sustainability issues including air quality, flood risk, energy efficiency, contaminated land and water use and have drafted a number of objectives to help manage these.	Noted. No action required.
	Whilst contaminated land is mentioned as a sustainability issue there is not an objective to manage it. This site includes a railway station which is likely to be highly contaminative and it is also identified in the issues section that numerous sites in the borough have been previously utilised for heavy industry and other polluting uses. Although this area is not within a groundwater Source Protection Zone, the National Planning Policy Framework (NPPF) takes a precautionary approach to land contamination. Land contamination should be investigated before the principle of development is determined to see whether it could preclude certain development due to environmental risk or cost of remediation. Where contamination is known or suspected, a desk study, investigation, remediation and other works may be required to enable safe development (Paragraph 183 of the NPPF).	Comments noted and it is recommended that land contamination is added into SA Objective 9 "To protect and manage water resources (including groundwater), remove land contamination risks and reduce surface water flood risk" and add a sub-criteria d) ensure development removes land contamination risks

	<p>We are unlikely to comment on land contamination at planning stage due to the low risk to controlled waters in this area however, developers should contact your Environmental Health team who may hold records on known/potential land contamination. They should follow the risk management framework provided in 'Model procedures for the management of land contamination (CLR11),' when dealing with land affected by contamination.</p>	<p>Noted. Comments passed onto DM planners</p>
<u>Historic England</u>	<p>The Euston area covered by the Plan is sensitive in terms of both the number and nature of heritage assets that could be affected by development. Furthermore, any tall building proposals may also have the potential to have effects on the historic environment both beyond the immediate and across neighbouring boroughs. As a result, and given the scale of development envisaged in the existing Euston Area Plan, it is important that the scoping exercise enables a framework that will effectively capture and accurately assess any significant effects on the historic environment.</p>	<p>Noted.</p>
	<p>We would agree that the Scoping Report uses an appropriate format, is clearly structured and that Tables 1 and 2 identify all the relevant plans, programmes and policies in relation to the Plan (Questions 1-3), although we would point out that Historic England Advice Note 4: Tall Buildings is in the process of being revised and will be republished shortly.</p>	<p>Noted. The Scoping Report will be updated once the Tall Buildings Advice Note has been republished.</p>
	<p>In relation to Questions 4, 5 and 6 we would suggest that a broader approach to historic environment issues should be taken to ensure the subsequent Sustainability Appraisal is sufficiently robust. While the approach as set out to the historic environment is satisfactory in as much as it encompasses, we</p>	<p>Noted. See below</p>

	<p>consider that without further amendments it may fail to assess the potential effects of development on existing townscape character, views and the setting of a number of highly important heritage assets including a number within the City of Westminster. Given the likely nature of new development within the Plan area it is clearly important that these effects are given appropriate consideration at this early and meaningful stage in the process.</p>	
	<p>In terms of the baseline information in Appendix 4, we note that there is no information relating to townscape character or views within the Landscape & Cultural Heritage topic. Given the potential effects that the nature of development envisaged within the Plan area may have on this element of the historic environment, it is clearly important that they form part of the assessment of the emerging Plan. We further note that the London View Management Framework is identified in Table 2 as a relevant mechanism in the environmental protection of the area, and as a result we consider that this should then inform Appendix 4. This will ensure that the important contribution that protected views make to conserving the setting and significance of heritage assets is appropriately taken into account as part of this exercise and achieve a comprehensive baseline.</p>	<p>Agreed. The Landscape and Cultural Heritage section of Appendix 4 has been updated to include a section on townscape views and the LVMF corridors that cross the Euston area. The following text is inserted on page 7 of Appendix 4:</p> <p>“Parts of the Euston Area lie within the Wider Setting Consultation Areas (background) of View 5A.2 and 6A.1 identified in the March 2012 LVMF. This indicates a height threshold of up to 30 metres high from approximate ground level.”</p>
	<p>In relation to the information on LB Camden’s conservation areas as set out on pages 4 and 5 of Appendix 4, we also consider that it would be helpful to include reference to the LB Camden Characterisation Study. This contains much helpful information, including analysis of existing townscape character across the Plan area and its surroundings within Camden.</p>	<p>Agreed. Reference to the Camden Characterisation Study has been made on page 5 of Appendix 4. The following text has been added:</p> <p>“Further information on these is included in the relevant Conservation Area Statements and Camden’s Characterisation Study.”</p>

	<p>We would not disagree that the sustainability issue in relation to the historic environment set out on page 15 of the Scoping Report is appropriate in as far as it goes. It is however very broad in nature and could go further in considering the likely impacts from development within the Plan area and how these might affect the significance of the historic environment as a whole as well as individual heritage assets.</p>	<p>This is agreed and section revised to add additional specific detail regarding the historic environment and the LVMF. The following text has been added to page 15 of the Scoping Report:</p> <p>“Parts of the Euston Area lie within the Wider Setting Consultation Areas (background) of View 5A.2 and 6A.1 identified in the March 2012 LVMF. This indicates a height threshold of up to 30 metres high from approximate ground level.”</p>
	<p>Without the broader approach to heritage issues set out above and below in relation to our comments on Qs 4 and 6, this approach would fail to assess all potential effects of new development and would represent an incomplete picture.</p>	<p>Noted.</p>
	<p>We consider that objectives 12 and 13 in the Scoping Report are appropriate as far as they go, yet in themselves would not achieve a comprehensive assessment of any likely effects on the historic environment as envisaged by the SA process. We note that urban design and the historic environment have been separated into two distinct objectives, but also that the criteria underpinning these has been amended from the appraisal of the 2015 version of the Plan to remove reference to consideration of strategic views. While objective 13 and its revised criteria in the Scoping Report are logical as far as it goes, the failure to incorporate reference to strategic views means that potentially significant adverse impacts on the historic environment from development in the setting of heritage assets may not be</p>	<p>This is agreed and objective 12 a) on page 23 of the Scoping Report has been added to:</p> <p>a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape and the LVMF strategic views. As a result of this change, Appendix 7 has been updated.</p>

	included. This could be addressed by simply including reference to LVMF strategic views within criteria a) of objective 12.	
<u>Natural England</u>	No comments to make	

DRAFT

APPENDIX B List of criteria and potential indicators relative to each SA objective

Ref.	Draft SA objective	Sub-criteria Will the Euston Area Plan.....
1	To promote the provision of a range of high quality and affordable housing to meet local needs	<ul style="list-style-type: none"> a) Provide adequate housing completions to meet local needs? b) Protect and promote affordable housing development? c) Provide housing for people, particularly families, on moderate and lower incomes? d) Encourage development at an appropriate density, standard, size and mix? e) Provide everybody with the opportunity to live in a better home?
2	To promote a healthy and safe community	<ul style="list-style-type: none"> a) Improve the health of the Borough's population by increasing the opportunity for healthy pursuits and promote healthy lifestyles? b) Provide opportunities and infrastructure that make the use of walking, cycling, and recreation facilities more attractive? c) Support health providers and commissioners to fulfil their strategic estates plans? d) Reduce levels of crime and fear of crime in the area?
3	To ensure access to local shopping, community and leisure facilities.	<ul style="list-style-type: none"> a) Encourage mixed use development? b) Encourage the retention and development of key services (e.g. shopping, community and leisure facilities)?
4	To tackle poverty and social exclusion	<ul style="list-style-type: none"> a) Encourage development that facilitates social cohesion and be beneficial to disadvantaged groups? b) Provide for equality of access for all to buildings and services? c) Encourage development opportunities in those areas in need of economic development and ensure local residents benefit from growth?
5	To improve amenity by minimising the impacts associated with development.	<ul style="list-style-type: none"> a) Ensure that the amenity of neighbours is not unduly impacted? b) Ensure that development and operations will not affect noise sensitive uses?
6	To conserve and improve open space provision and increase	<ul style="list-style-type: none"> a) Help to protect, increase/improve open space? b) Help to increase access to and improve overall open space provision, including children's play space?

	access to and enhancement of open space.	c) Help to make it easier and safer to access local amenities on foot or by bicycle?
7	To improve local air quality and limit exposure	a) Contribute to an improvement of air quality? b) Reduce exposure to harmful emissions? c) Support the actions in the Council's Clean Air Action Plan? d) Encourage the use of alternative modes of transport to the motorised vehicles and prioritise and encourage low emission, sustainable modes of transport (walking and cycling)? e) Address the impact of motorised freight on air quality through working with local businesses to reduce, remode and retime their deliveries?
8	To achieve a net zero carbon Camden by 2030, promoting the efficient use of energy, and other natural resources, throughout the life of the development, mitigating the effects of climate change and reducing waste requiring final disposal.	a) Encourage energy efficiency through passive design measures? b) Help to reduce carbon dioxide emissions and other greenhouse gas concentrations in the atmosphere? c) Encourage the re-use of resources and circular economy? d) Ensure reduction of waste during the development process and/or operation? e) Encourage a more efficient supply of resources? f) Encourage sustainable design and construction? g) Reducing reliance on motorised vehicles. Where vehicles are still required encouraging the uptake of low-emission vehicles, particularly for taxis, buses and freight? h) Work with local schools to enable more journeys to and from schools in the Euston area to be made by sustainable, low-emission modes?
9	To protect and manage water resources (including groundwater), remove land contamination risks and reduce	a) Promote the sustainable use of water resources? b) Encourage development that incorporates sustainable drainage? c) Take into account potential flood risk? d) Remove land contamination risks?

	surface water flood risk	
10	To protect and enhance existing habitats and biodiversity and to seek to increase these where possible.	<ul style="list-style-type: none"> a) Protect and enhance natural habitats in the borough, particularly those of priority species, identified in the borough's Biodiversity Action Plan? b) Provide for the protection of biodiversity and open space in the borough? c) Prevent habitat fragmentation and increase connectivity through habitat corridors? d) Protect and provide for the protection and planting of more trees in the borough?
11	To reduce reliance on private transport modes, promote sustainable travel and enhance permeable access within the local area	<ul style="list-style-type: none"> a) Encourage development at locations that enable walking, cycling and/or the use of public transport? b) Encourage the provision of infrastructure for walking, cycling and/or the provision of public transport? c) Encourage access for all to public transport? d) Encourage a decrease in car usage? e) Enhance permeability of the area for access by non-motorised forms of transport? f) Identifying opportunities for increasing car club provision? g) Increasing the provision of low-traffic neighbourhoods and Healthy School Streets?
12	To promote high quality and sustainable urban design.	<ul style="list-style-type: none"> a) Provide for a high quality of urban design, taking into consideration the characteristics of the existing townscape and LVMF strategic views? b) Ensure enhancement of the public realm and local distinctiveness? c) Encourage the use of sustainable design and construction methods?
13	To protect and enhance the historic environment	<ul style="list-style-type: none"> a) Conserve and enhance designated and non-designated heritage assets and their settings and other areas of intrinsic and historical value?
14	To ensure new development makes efficient use of land, buildings and infrastructure.	<ul style="list-style-type: none"> a) Encourage the reuse or improvement of buildings and land, that are vacant, underutilised or in disrepair? b) Ensure efficient use of land through maximising densities where appropriate?

15	To encourage and accommodate sustainable economic growth and employment opportunity.	<ul style="list-style-type: none"> a) Encourage the retention and growth of existing, locally based industries? b) Accommodate new and expanding businesses? c) Encourage new investment in the local economy and promote development opportunities for employment? d) Focus growth in growth areas and other highly accessible locations?
16	To maximise the benefits of regeneration and development to promote sustainable communities	<ul style="list-style-type: none"> a) Encourage sustainable inward investment that will promote social wellbeing and benefit the economy? b) Promote access to employment opportunities for local people? c) Protect existing and provide for new education facilities to meet needs, both for existing and new residents?

APPENDIX C Compliance with SEA Directive

As discussed in Chapter 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. The table below sets out how and where (within this report) the regulatory requirements are reflected.

SEA requirement (as set out in EU Directive 2001/42/EC)	Where is it covered in the SA report?
a) An outline of contents, main objectives of the plan or programme and relationship with other plans and programmes	<ul style="list-style-type: none"> Appendix 2 of the SA Scoping Report 2021 outlines the relationship with other plans, programmes and policies. Table 2 of this SA report lists the plans, programmes and policies reviewed as part of the SA process. This has been updated in Appendix E.
b) The relevant aspects of the current state of the environment and the likely evaluation thereof without implementation of the plan or programme	<ul style="list-style-type: none"> Appendix 4 of the SA Scoping Report outlines the baseline information for the borough. A summary of key issues is presented in table 2 of the SA report. The baseline information is summarised in chapter 6.
c) The environmental characteristics of the areas likely to be significantly affected	<ul style="list-style-type: none"> This is covered in Appendix 4 of the Scoping Report which identifies the key baseline information for the borough. The baseline characteristics of the borough are also contained in chapter 6 of the SA report.
d) Any existing environmental problems which are relevant to the plan or programme including those relating to areas of a particular environmental importance such as areas designated pursuant to Directives 79/409/EEC (birds directive) and 92/43/EEC (habitats directive)	<ul style="list-style-type: none"> A Habitats Regulation Assessment screening assessment was completed on the the Camden Local Plan Proposed Submission Draft concluded that the draft plan is unlikely to have significant effects on sites of European importance for habitats or species, or an adverse impact on the integrity of those sites. A assessment of the EAP will be published for consultation alongside the EAP proposed submission draft.
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have	<ul style="list-style-type: none"> These are set out in Appendix 2 of the SA Scoping Report, see also chapter 6 of the SA report which briefly outlines how these have been considered in the preparation of the EAP review

been taken into account during its preparation	
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, flora, fauna, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationships between these factors	<ul style="list-style-type: none"> • These are covered in the sustainability objectives against which all of the EAP sites will have been assessed the main Report.
g) The measures envisaged to prevent, reduce and as full as possible offset any significant adverse effects on the environment of implementing the plan or programme	<ul style="list-style-type: none"> • Mitigation measures are discussed in the section 8 of the SA report and considered in the preparation of the Environment Strategy in the EAP Update.
h) Outline the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information	<ul style="list-style-type: none"> • Section 9 of this SA report detail how the options were developed and considered while the gaps and difficulties in obtaining some baseline data was explained in chapter 5 of the SA Scoping Report.
i) A description of measures envisaged concerning monitoring	<ul style="list-style-type: none"> • Proposed monitoring measures are found in Chapter 5 of the EAP update and the Council's AMR
j) a non-technical summary of the information provided under the above headings	<ul style="list-style-type: none"> • A non-technical summary will be published alongside this report.

APPENDIX D – Sites considered but not allocated

Sites considered as part of the preparation of the draft Euston Area Plan 2023 (Regulation 18 version) but not included as allocations are listed below.

Site name	Site identification source	Reason why the site was not included in the Proposed Submission Local Plan
Drummond Crescent	Planning permission	Developed
Stephenson House, 75 Hampstead Road	Planning permission	Developed
53-55 Chalton Street & 70 Churchway	Planning permission	Under construction and below threshold

Additional sites considered as part of the preparation of the Proposed Submission Euston Area Plan 2025 (Regulation 19 version) but not included as allocations are listed below.

Site name	Site identification source	Reason why the site was not included in the Proposed Submission Local Plan
17-37 William Road	Planning Application	Under construction stage at the time of consideration
8-14 William Road	Internal review	No prospect of being developed in plan period
Euston Tower 286 Euston Road, NW1 3DP	Planning Application	Under construction stage at the time of consideration
Evergreen House 160 Euston Road London, NW1 2DX	Internal review	No prospect of being developed in plan period
Land at Goldsmith's House and adjoining land, Cumberland Market Estate, Park Village East/Augustus St	Site allocation Local Plan 2013 and EAP 2015	No prospect of being developed in plan period
Margarete Centre 108 Hampstead Road NW1 2LS	Internal review	No prospect of being developed in plan period
Travelodge Eversholt Street 1-11 Grafton Place NW1 1DJ	Officers	No prospect of being developed in plan period
Regent's Park Barracks Albany St, London NW1 4AN	Call for Sites	Outside EAP boundary
75 Hampstead Road (Stephenson House/ the Lantern)	Planning permission	Recently developed

London Zoo Car Park	Call for Sites	Outside EAP boundary
42 Phoenix Road	Planning permission	Limited development potential
Churchway Estate	Allocated in draft EAP Update 2023	Further work to be done with communities to identify sites
Amphill Estate	Allocated in draft EAP Update 2023	Further work to be done with communities to identify sites
Regents Park Estate	Some sites allocated in EAP 2015. Allocated in draft EAP Update 2023	Some sites delivered. Further work to be done with communities to identify sites

APPENDIX E: Updated Plans and programmes

This appraisal of policies, plans or programmes was included as part of the EAP Update Scoping Report 2021. As a large number of these have been updated since 2021, it is considered prudent to provide an updated table summarising the key objectives, implications and considerations for the Regulation 19 EAP Update and Sustainability Appraisal.

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Area Plan	Implications and Considerations for Sustainability Appraisal (SA)	Implications and Considerations for the Euston Area Plan update
NATIONAL:				
1.	<u>National Planning Policy Framework 2024 (and associated National Planning Practice Guidance)</u>	<p>The NPPF (2024) reiterates the presumption in favour of sustainable development. The UK has agreed to pursue the 17 Global Goals for Sustainable Development in the period 2030.</p> <p>The government's planning policy approach for delivering sustainable development sets out the following key policy themes:</p> <ol style="list-style-type: none"> 1. Achieving sustainable development 2. Plan-making 3. Decision-making 4. Delivering a sufficient supply of homes 5. Building a strong, competitive economy 6. Ensuring the vitality of town centres 	<p>The NPPF contains a number of principles, objectives and policies which should be taken into account in considering the sustainability objectives.</p> <p>There are some areas of potential conflict, e.g. supporting economic growth and more efficient use of land (e.g. through higher density) against design and conservation related considerations and objectives.</p>	<p>The EAP Update reflects the objectives of the NPPF and sets out principles ensuring environmental, economic and social objectives are considered in accordance with the NPPF.</p> <p>Public participation and consultation form a key part of drawing up the document.</p>

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Area Plan	Implications and Considerations for Sustainability Appraisal (SA)	Implications and Considerations for the Euston Area Plan update
		<ul style="list-style-type: none"> 7. Promoting healthy and safe communities 8. Promoting sustainable transport 9. Supporting high quality communications 10. Making effective use of land 11. Achieving well-designed places 12. Protecting Green Belt land 13. Meeting the challenge of climate change, flooding and coastal change 14. Conserving and enhancing the natural environment 15. Conserving and enhancing the historic environment 16. Facilitating the sustainable use of minerals 		
2.	<u>Transforming our world: the 2030 Agenda for Sustainable Development</u>	This document sets out new global Sustainable Development goals with the aim of full implementation of the Agenda by 2030. The goals recognise that eradicating poverty in all its forms and dimensions, including extreme poverty, is the greatest global challenge and an indispensable requirement for sustainable development and are committed to	Ensure that the range of sustainability objectives reflect key principles and priorities and promote sustainable development and communities	The EAP Update reflects, embeds and highlights its contribution to delivering the 17 Sustainable Development goals.

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Area Plan	Implications and Considerations for Sustainability Appraisal (SA)	Implications and Considerations for the Euston Area Plan update
		<p>achieving sustainable development in its three dimensions – economic, social and environmental – in a balanced and integrated manner.</p> <p>The Agenda sets out the following 17 Sustainable Development goals with 169 associated targets.</p> <ul style="list-style-type: none"> • Goal 1. End poverty in all its forms everywhere • Goal 2. End hunger, achieve food security and improved nutrition and promote sustainable agriculture • Goal 3. Ensure healthy lives and promote well-being for all at all ages • Goal 4. Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all • Goal 5. Achieve gender equality and empower all women and girls • Goal 6. Ensure availability and sustainable management of water and sanitation for all 		

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Area Plan	Implications and Considerations for Sustainability Appraisal (SA)	Implications and Considerations for the Euston Area Plan update
		<ul style="list-style-type: none"> • Goal 7. Ensure access to affordable, reliable, sustainable and modern energy for all • Goal 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all • Goal 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation • Goal 10. Reduce inequality within and among countries • Goal 11. Make cities and human settlements inclusive, safe, resilient and sustainable • Goal 12. Ensure sustainable consumption and production patterns • Goal 13. Take urgent action to combat climate change and its impacts* • Goal 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development 		

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Area Plan	Implications and Considerations for Sustainability Appraisal (SA)	Implications and Considerations for the Euston Area Plan update
		<ul style="list-style-type: none"> • Goal 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss • Goal 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels • Goal 17. Strengthen the means of implementation and revitalize the global partnership for sustainable development 		
3.	<u>Environment Act 2021</u>	The UK's Environment Act 2021 establishes the UK's framework for environmental protection, setting long-term targets for improving air quality, biodiversity, water, and waste reduction in England. It creates an independent Office for Environmental Protection (OEP) to hold the government to	The SA should aim to reflect the focus of these principles.	The EAP Update should support the approach and areas of action where appropriate.

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Area Plan	Implications and Considerations for Sustainability Appraisal (SA)	Implications and Considerations for the Euston Area Plan update
		<p>account, embeds post-Brexit environmental principles, and includes measures for local government waste reform, nature recovery through local nature recovery strategies, and biodiversity net gain for new developments. It includes mandatory Biodiversity Net Gain (BNG) for most development in England from February 2024</p> <p>The Act is broken down into seven key parts:</p> <ul style="list-style-type: none"> • Parts 1 and 2: Environmental governance, principles, targets and improvement plans • Part 3: Waste and resource efficiency • Part 4: Air quality and environmental recall • Part 5: Water • Part 6: Nature and biodiversity • Part 7: Conservation covenants 		

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Area Plan	Implications and Considerations for Sustainability Appraisal (SA)	Implications and Considerations for the Euston Area Plan update
4.	<u>Environmental Improvement Plan: annual progress report 2023 to 2024</u>	<p>The Environmental Improvement Plan (EIP23) was published in 2023, in accordance with the Environment Act 2021, as a revision of the 25 Year Environment Plan (25YEP) published in 2018.</p> <p>EIP23 is set out in 10 goals. Each goal has specific targets and commitments described in the EIP23 that contribute to the goal outcome, including the legally binding targets set under the Environment Act 2021. The annual progress report is set out under these goals. This report provides a selection of key achievement updates related to each EIP23 goal. The 10 goals are:</p> <ol style="list-style-type: none"> 1. Thriving plants and wildlife 2. Clean air 3. Clean and plentiful water 4. Managing exposure to chemicals and pesticides 5. Maximise our resources, minimise our waste 6. Using resources from nature sustainably 7. Mitigating and adapting to climate change 	The SA objections should meet the goals and targets set out in the Plan.	The EAP should help ensure that these targets continue to be met in the future.

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Area Plan	Implications and Considerations for Sustainability Appraisal (SA)	Implications and Considerations for the Euston Area Plan update
		<ul style="list-style-type: none"> 8. Reduced risk of harm from environmental hazards 9. Enhancing biosecurity 10. Enhancing beauty, heritage and engagement with the natural environment 		
5.	<u>Global Air Quality Guidelines</u>	<p>The World Health Organization (WHO) published updated Global Air Quality Guidelines in September 2021 covering Particulate matter (PM2.5 and PM10), ozone, nitrogen dioxide, sulphur dioxide and carbon monoxide. They provide guidance on thresholds and limits for key air pollutants that pose health risks. They are guidelines only and are not binding on any country unless that country chooses to adopt them into its own legislation.</p> <p>The UK Government and devolved executives published a Revised UK National Air Pollution Control Programme (NAPCP) in February 2023, to meet the national emissions ceilings legislation requirements, which must be met by the UK as a whole. The NAPCP sets out measures and</p>	SA objectives should support measures that can contribute to improved air quality taking into account the national guidance.	The EAP should be aware of the national guidance and should promote the achievement of the targets and objectives set out. This is particularly relevant in Camden, where air quality standards are not currently being met.

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Area Plan	Implications and Considerations for Sustainability Appraisal (SA)	Implications and Considerations for the Euston Area Plan update
		analysis for meeting the emission reduction commitments.		
6.	<u>National Framework for Water Resources 2025: water for growth, nature and a resilient future</u>	<p>This Framework provides an overview of England's long term water needs, setting out the scale of action needed to ensure resilient supplies and an improved water environment.</p> <p>The National Framework explores the long-term water needs in England across different sectors of water use. It considers the capacity of the water environment to be able to provide sustainable water supplies to homes and businesses, to support the production of energy and to improve food security. It considers emerging demands from other sectors, and identifies the actions needed to adapt to a range of future pressures.</p>	SA should meet the aims set out in this National framework.	The EAP should be aware of this new Framework and promote preserving water resources.
7.	<u>Simpler recycling: workplace recycling in England</u> <u>The Separation of</u>	<p>Workplace recycling in England changed on 31 March 2025. Guidance for all businesses, charities and public sector organisations on separating recyclable waste.</p> <p>Businesses and workplaces have a legal duty to <u>ensure waste disposal is</u></p>	The SA needs to consider these new regulations.	The EAP should promote the aims of the regulations and guidance.

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Area Plan	Implications and Considerations for Sustainability Appraisal (SA)	Implications and Considerations for the Euston Area Plan update
	<u>Waste (England) Regulations 2025</u>	safe, secure and legal and take all reasonable steps to keep waste to a minimum.		
8.	<u>The Historic Environment in Local Plans: 1</u> (2015)	This note provides information on good practice when implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (PPG). It emphasises that all information requirements and assessment work in support of plan-making and heritage protection needs to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets and helps LPAs make well informed and effective local plans. The guidance note sets out the need to consider inter-relationship of the objectives for the historic environment	The SA objectives should ensure that they recognise and reinforce the historic significance of places.	The EAP should ensure that the good practice is followed with regard to the historic environment.

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Area Plan	Implications and Considerations for Sustainability Appraisal (SA)	Implications and Considerations for the Euston Area Plan update
		<p>with the following relevance for the Euston Area:</p> <ul style="list-style-type: none"> • Building a strong, competitive economy • Ensuring the vitality of town centres • Promoting sustainable transport • Delivering a wide choice of high quality homes • Requiring good design • Meeting the challenge of climate change 		
9.	<u>Managing Significance in Decision Taking in the Historic Environment: Good Practice Advice Note 2 (2015)</u>	<p>This guidance note provides information on good practice with regard to assessing the significance of heritage assets. The advice in the document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset needs to be proportionate to the significance of the</p>	<p>Within the EAP area boundary there are a number of heritage assets including designated heritage assets and non-designated heritage assets.</p>	<p>The EAP should seek to ensure that development proposals are designed with the knowledge and understanding of the significance of the heritage assets they may affect.</p>

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Area Plan	Implications and Considerations for Sustainability Appraisal (SA)	Implications and Considerations for the Euston Area Plan update
		heritage assets affected and the impact on that significance		
10.	<u>Conservation Area Designation, Appraisal and Management (Historic England, 2019) Advice Note 1 Second Edition</u>	This note provides information on conservation area appraisal, designation and management. It emphasises that evidence is required to inform decisions affecting a conservation area.	Part of the Euston Area falls within conservation areas. The protection of the historic environment should form part of a sustainability appraisal.	Conservation principles should form a part of the EAP.
11.	<u>The Setting of Heritage Assets – 2nd Edition (Historic England, 2017)</u>	This document sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes. It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well	Objectives should include reference to the setting of historic assets.	The EAP should take into account the need to consider impact of development on the setting of historic assets.

Ref No.	Policies, Plans or Programme of Potential Relevance	Key Objectives: Issues, Guidance, Indicators or Targets relevant to the Area Plan	Implications and Considerations for Sustainability Appraisal (SA)	Implications and Considerations for the Euston Area Plan update
		as advice on how views contribute to setting. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets. The guidance has been written for local planning authorities and those proposing change to heritage assets.		
12.	<u>Tall buildings Historic England Advice Note 4 (2022)</u>	This Historic England Advice Note updates previous guidance by produced in 2015. It seeks to guide people involved in planning for and designing tall buildings so that they may be delivered in a sustainable and successful way through the development plan and development management process.	The SA objectives should reflect the general principles to achieve higher quality and sustainable design.	The EAP will need to look at where areas for tall buildings are potentially appropriate.
13.	<u>UK Biodiversity Framework</u>	The UK Biodiversity Framework (UKBF) is a joint agreement between the UK's four governments to coordinate action on biodiversity, aiming to meet international commitments, particularly the Kunming-Montreal Global Biodiversity Framework (KMGBF), and foster	SA objectives should incorporate the key aims of the framework to protect and recover nature.	The EAP should take into account the objectives and points for action and help ensure its implementation through planning.

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		nature recovery. Overseen by the Four Countries' Biodiversity Group, the framework establishes shared objectives, a governance structure, and a means for communication and collaboration to address biodiversity loss across the UK. The 2024 UKBF supersedes the UK Post-2010 Biodiversity Framework and serves as the UK's national mechanism to implement global biodiversity targets.		
14.	<u>The Community Infrastructure Levy Regulations 2010 and amendments 2019</u>	<p>The Community Infrastructure Levy (the levy) is a tool for local authorities in England and Wales to help deliver infrastructure to support the development of the area.</p> <p>Changes were made to the Community Infrastructure Levy Regulations through the <u>Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019</u> which came into force on 1 September 2019.</p> <p>Regulation 5 (and Schedule 1) of the 2019 Amendment Regulations (No. 2) make a number of changes to regulation 9, regulation 40 and regulation 50 of the CIL regulations in relation to a chargeable development;</p>	The SA should consider the impact of CIL in delivering local infrastructure.	In drafting, the EAP should take these regulations into account.

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		the chargeable amount and the calculation of social housing relief.		
15.	<u>Thames Abstraction Licensing Strategy (Environment Agency, 2019)</u>	This document sets out how much water there is available for abstraction within the Thames catchment, after consideration of the needs of the environment and existing abstractors. It details how the Environment Agency will manage water resources, what conditions may be applied to new abstraction licences within the catchment, and how these licences will be determined	Water resources need to be considered through the SA framework.	While the Council does not have control over water abstraction, the EAP can be used to ensure water resources in Camden are managed as effectively as possible.
16.	<u>Fair Society, Healthy Lives - The Marmot Review (post-2010)</u>	The Review focuses on interventions that reduce both health inequalities and mitigate climate change, by: active travel; good quality open and green spaces; Improving the food environment in local; energy efficiency of housing; integrate the planning, transport, housing, environmental and health systems to address the social determinants of health; reduce social isolation.	The aims of this report should be incorporated into the SA.	The EAP should help promote the aims set out in this report.

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17.	<u>Land contamination risk management (LCRM) 2021</u>	<p>This document highlights that dealing with land contamination helps make the environment clean and safe. Through regeneration it can:</p> <ul style="list-style-type: none"> • enhance the health and wellbeing of all • add to the economic, ecological and amenity value of the area <p>Use land contamination risk management (LCRM) to:</p> <ul style="list-style-type: none"> • identify and assess if there is an unacceptable risk • assess what remediation options are suitable to manage the risk • plan and carry out remediation verify that remediation has worked 	Land contamination will need to be considered within the SA framework.	The EAP will need to follow this guidance to help manage the risks from land contamination.

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18.	<u>Noise action plans: large urban areas, roads and railways (2019)</u> Environment al Noise (England) Regulations 2006	This Action Plan aims to promote good health and good quality of life (wellbeing) through the effective management of noise. It is intended that this Action Plan will assist the management of environmental noise in the context of Government policy on sustainable development.	The SA objectives should incorporate the key aims of the Plan.	The EAP should take into account the objectives and points for action and help ensure its implementation through planning.

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19.	<u>BREEAM</u>	<p>BREEAM is a standardised sustainability assessment tool to measure the overall performance of buildings against set criteria. Buildings that achieve high ratings use less energy, consume less water and have lower running costs than those designed to building regulations alone. BREEAM assessments generally consist of nine categories covering: Energy; Health and Well-being; Land use and Ecology; Management; Materials; Pollution; Transport; Waste; Water. The development is then rated on a scale from PASS, to GOOD, VERY GOOD, EXCELLENT and ending with OUTSTANDING.</p>	The SA objectives will incorporate the aims of BREEAM.	The EAP should ensure that the BREEAM tool is used in ensuring sustainable development.

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20.	<u>Flood and Water Management Act 2010</u>	Flood risk is governed by the Flood and Water Management Act 2010 (FWMA), which replaced the Flood Risk Regulations 2009 and transposed the EU Floods Directive. This Act assigns Lead Local Flood Authorities (LLFAs) responsibility for local flood risk and requires the Environment Agency to create a National Flood and Coastal Erosion Risk Management (FCERM) Strategy. Key elements include sustainable drainage systems (SuDS), and the requirement for flood risk assessments for new developments.	SA objectives should reflect the requirements of the Act.	The EAP area experiences surface water flooding and SuDS will be required as part of new development.
21.	<u>Passivhaus</u>	PassivHaus is a design and construction standard that can result in a 90% reduction in energy demand and usage. It can be applied to both commercial and residential buildings.	SA objectives should reflect approaches to reducing energy demand and usage.	The EAP should ensure that building energy demands meet high sustainability standards.
22.	<u>The UK's Plans and Progress to Reach Net Zero by 2050</u>	The UK is committed to reaching net zero by 2050. This means that the total greenhouse gas emissions would be equal to the emissions removed from the atmosphere, with the aim of limiting global warming and resultant climate change.	While UK emissions are falling and the net-zero target is deliverable, significant further action is needed through developments like at Euston, to accelerate the rollout of heat pumps and electric vehicles and to make electricity cheaper for	The EAP should put net zero and the effort to fight climate change at its core.

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		<p>The UK Government has adopted a suite of policies in order to reach net zero. Its most recent strategy document, published under the previous Government, is the 2023 Carbon Budget Delivery Plan (March 2023), with a revised plan to be published in Autumn 2025.</p> <p>The CCC's 2025 Progress Report recognised the new government's ambitions and assessed that the net zero target is "within reach, provided the government stays the course". The CCC noted that while historic progress has been driven by decarbonisation of the electricity system, more recent progress could be attributed to the surface transport sector, alongside the increased roll out of measures such as heat pumps, and policies such as tree planting</p>	consumers by removing policy costs from bills	
23.	<u>Integrated National Strategy: a call for ideas</u>	<p>The Department for Transport is developing a strategy which will set the high-level direction for how transport should be designed, built and operated in England over the next 10 years. It will set out a single national vision which will put people who use transport</p>	The SA objectives should be mindful of the strategy and vision in terms of the Government's vision for urban transport.	The Area Plan should build on the principles in the Strategy.

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		and their needs at its heart and empower local leaders to deliver integrated transport solutions that meet the needs of their local communities.		
24.	<u>Safer Places: The Planning System and Crime Prevention (Home Office/ODPM 2004)</u>	<p>Although this has been superseded by national planning policy guidance, it still provides useful and relevant guidance for design and access and crime impact statements.</p> <p>This guide states that sustainable communities are those that succeed economically, socially and environmentally, and respect the needs of future generations. They are well-designed places where people feel safe and secure; where crime and disorder, or the fear of crime, doesn't undermine quality of life or community cohesion. Safer places are therefore key to creating sustainable communities.</p>	SA objectives should reflect the identified attributes in relation to accessibility, safety, and high quality urban design.	The Area Plan should take into account the attributes of safe, sustainable places and incorporate these into local planning policy.
25.	<u>Planning policy for traveller sites 2024</u>	This document sets out the planning aspects of finding sites for gypsies and travellers and how local authorities and gypsies and travellers can work together to achieve that aim.	The SA objectives should reflect the intentions of the Policy paper to ensure that everyone has the opportunity of living in a decent home.	The Area Plan should include policies on the provision of a range of housing to meet different needs.

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		The overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.		
26.	<u>Gear change: A bold vision for cycling and walking.</u>	This sets out the National Government's aspirations to make England 'a great cycling nation' and transform the role cycling and walking can play in the transport system.	The SA objectives should reflect and build upon these aspirations.	The Area Plan should promote sustainable modes of transport.
LONDON WIDE:				
27.	<u>The London Plan 2021</u>	The London Plan was formally published in March 2021. A key element which underpins the new policies is the guiding principle of 'Good Growth', which is achieving growth that is economically and socially inclusive and environmentally sustainable. There are six cross cutting policy objectives around making the best use of land, strong and inclusive communities, creating a healthy city, delivering homes, London's economy and efficiency and resilience. It is worth noting that this Plan is more comprehensive and in-depth than its predecessor and contains a variety of	SA objectives should reflect and build upon its strategic themes and objectives.	<p>Tensions can exist between targets to build at higher densities and conservation and other design objectives, e.g. quality of public space.</p> <p>One of the key statutory requirements is for local development documents to be in general conformity with the London Plan.</p>

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		detailed policy positions that will need to be considered when determining applications for new development in Camden.		
28.	<u>Mayor's Transport Strategy 2018</u>	<p>It sets out the Mayor's policies and proposals for reshaping transport over the next two decades.</p> <p>Policy approaches include:</p> <ul style="list-style-type: none"> • Reducing dependency on cars in favour of active, efficient and sustainable modes of travel, with the aim of 80% of all trips in London being made on foot, by cycle or public transport by 2041. • Working towards the elimination of road traffic deaths and serious injuries by reducing the dominance of motor vehicles. • Prioritising space-efficient modes of transport to tackle congestion and improve the efficiency of streets for the movement of people and goods. • Taking action to reduce emissions – in particular diesel emissions from vehicles – to 	SA objectives should reflect priorities of the Transport Strategy and translate them, as appropriate, to the local level.	The Strategy's objectives and policies are integrated in the London Plan and should be reflected in the EAP.

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		<p>improve air quality and support compliance with UK and EU legal limits as soon as possible.</p> <ul style="list-style-type: none"> • Making London's transport network zero emission by 2050, contributing towards the creation of a zero carbon city, including achieving a health-based target of 10µg/m³ for PM_{2.5} by 2030. • Use of the 'Healthy Streets' approach to provide an attractive 'whole journey experience' that will facilitate mode shift away from the car. • Making the public transport network easier and more pleasant to use, enabling customers to enjoy comfortable, confident, safe and secure, informed and stress-free travel. • Enabling disabled and older people to more easily travel spontaneously and independently and reducing the additional journey time that 		

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		disabled and older users can experience.		
29.	London Growth Plan	<p>This plan is London's 10-year ambition for growth, and the actions we will take to make it happen. It includes the sectors and places that London will grow.</p> <p>The London Growth Plan sets out how the GLA will support the UK government's national industrial strategy and growth ambitions through a range of pro-growth interventions, including delivering more affordable housing, major investments in our transport network and vital skills training for Londoners. The plan also identifies huge opportunities for London to unleash growth in the industries of the future, such as artificial intelligence (AI), life sciences, robotics, cleantech, the creative industries and quantum computing.</p> <p>This growth plan sets out four bold ambitions:</p> <ol style="list-style-type: none"> 1. <u>Productivity</u>: Raise productivity growth rates to 2% average per year over 2025 to 2035. 	To reflect these objectives but also to recognise that economic growth objectives can potentially conflict with other social and environmental objectives.	The EAP should ensure that economic growth benefits all and ensure that development fully benefits the Knowledge Quarter.

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		<ol style="list-style-type: none"> 2. <u>Inclusion</u>: Raise the real household weekly income (after housing costs) of the lowest earning 20% of Londoners by 20% by 2035. This would mean that at least a million London households would have on average an extra £50 to spend each week after paying for housing costs. 3. <u>Green growth</u>: Accelerate progress towards achieving London's net zero target for 2030. 4. <u>A global capital</u>: Grow London's services exports by an average of 6% per year. 		
30.	<u>London Housing Strategy 2018</u>	<p>This Strategy sets out the Mayor's vision for housing, and his policies and proposals to make that happen. The five priorities are:</p> <ul style="list-style-type: none"> • Building homes for Londoners; • Delivering genuinely affordable homes; • High quality homes and inclusive neighbourhoods; 	The objectives of the SA should reflect the priorities of the Housing Strategy and translate them, as appropriate, to the local level.	The EAP should take into account the need for homes that are affordable, high quality and provide inclusive neighbourhoods.

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		<ul style="list-style-type: none"> • A fairer deal for private renters and leaseholders; and • Tackling homelessness and helping rough sleepers. <p>The Mayor aims to bring forward more land for housing, making more intensive use of available land and seeking greater intervention in the land market. Development is to be prioritised on brownfield sites, in and around town centres, and on smaller sites in areas that have traditionally hosted fewer new homes. Investment will be targeted towards infrastructure projects that can help to unlock significant housing delivery. The Mayor also wishes to see a wider range of housing providers, with councils playing a bigger role and new players entering the industry.</p> <p>The Mayor's long-term strategic target is for half of new homes to be genuinely affordable, with developments to be 'fast-tracked' through the planning system where they meet a minimum threshold.</p>		

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		Where comprehensive redevelopment of housing estates is proposed, the Mayor will only provide funding where there has been a successful ballot of existing residents.		
31.	<u>Housing in London 2024</u> <u>The evidence base for the London Housing Strategy (2024)</u>	<p>This document sets out the evidence for the Housing Strategy. Key points are:</p> <ol style="list-style-type: none"> 1. Housing Supply and Affordability: London saw a 17% increase in housing supply in 2021/22 compared to the previous year, with 37,582 new homes completed. However, housing affordability remains a challenge, with London households spending a median of 26.9% of their income on housing costs in 2021/22, up from 24.2% in 2020/21. 2. Homelessness and Temporary Accommodation: Homelessness is rising sharply, with 65,280 households in temporary accommodation as of March 2024, the highest on 	The SA should draw upon the evidence set out in the report.	The EAP should take into account the evidence and key housing issues

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		<p>record. This includes 86,810 children, a 13% increase from the previous year. Nearly 12,000 people were seen sleeping rough in 2023/24, the highest figure recorded.</p> <p>3. Energy Efficiency and Decent Homes: The energy efficiency of London's housing stock has improved, with a median SAP rating of 70% in 2022. However, 10% of homes still fall below the Decent Homes Standard, and remediation of unsafe cladding remains incomplete for many buildings.</p> <p>4. Private Rental Market: Average private rents in London are significantly higher than the rest of England, with a one-bedroom home in London costing 53% more than a three-bedroom home elsewhere. Rental price inflation surged post-pandemic but began slowing in 2024.</p>		

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		<p>5. Social Housing and Overcrowding: Social housing stock in London reached 799,880 homes in 2023, the highest since 2002. However, overcrowding remains an issue, with 6.6% of households in London classified as overcrowded, particularly in the social and private rental sectors.</p>		
32.	<u>Housing Design Standards LPG 2023</u>	<p>The Housing Design Standards guidance brings together, and helps to interpret, the housing-related design guidance and policies in the London Plan. Given the inevitable tensions and compromises that arise between different design elements during the design process, the LPG has consolidated the different considerations into tables within the document with links back to the source policy. This aims to help optimise design quality and help balance different aspects throughout the design process.</p>	<p>The SA should recognise the aims of this guidance in delivering homes.</p>	<p>The EAP should ensure that high quality housing is delivered.</p>

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		<p>The guidance is grouped into three broad headings to align with the design process, considering the wider context of a site first, through to shared spaces and then to the design of the home and private outside space:</p> <ul style="list-style-type: none"> • Placemaking and the public realm – the area around the site • Shared spaces and ancillary spaces – communal spaces within the site • Homes and private outside space – private homes and spaces within the site. 		
33.	<u>Homes for Londoners: Affordable Housing and Viability SPG 2017</u>	This SPG sets out a strategic target that half of new homes should be affordable and introduced the Threshold Approach to affordable housing. Under the Threshold Approach, development proposals that provide 35 per cent affordable housing and 50 per cent on public land.	The SA objectives should reflect the aims and guidance set out in the SPG.	The EAP should make sure that the approach and viability guidance are taken into account.
34.	<u>London's Environment Strategy 2018</u>	Sets out a strategy for improving the quality of London's environment, with an overarching aim of ensuring London is greener, cleaner and ready for the	SA objectives should take account of the Environment Strategy and translate them, as appropriate, to the local level.	The EAP should take into account the key areas of this strategy as translated into policy.

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		<p>future. It sets out a range of actions for the following areas:</p> <p>Air quality:</p> <ul style="list-style-type: none"> • Cleaning up the transport system, making the whole bus fleet zero emission by 2037 and introducing the Ultra-Low Emission Zone by 2019; • Using a new Air Quality Positive standard so new building developments contribute to cleaning London's air; • Provide more information for Londoners on when air pollution is bad. <p>Greening:</p> <ul style="list-style-type: none"> • Making London the first National Park City, including providing a Greener City Fund to support additional planting; • Improve greening in areas with the least amount of greenspace; • Use of new Urban Greening Factors in development (through the London Plan) <p>Climate change:</p>		

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		<ul style="list-style-type: none"> Improving the energy efficiency of homes and public buildings, and supporting roll out of smart meters; Ensuring private landlords improve the energy efficiency of their properties; Zero carbon developments by 2019 and increasing clean energy generation with 1GW of installed solar capacity by 2030. <p>Waste:</p> <ul style="list-style-type: none"> Help cut food and associated packaging waste by 50% by 2030; Provision of community water refill schemes and water fountains to reduce the use of single use plastic bottles; Ensuring there are sufficient sites to manage waste in London. <p>Adaptation:</p> <ul style="list-style-type: none"> Improving readiness of infrastructure for extreme weather events; 		

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		<ul style="list-style-type: none"> • Making developments more water efficient • Improving water security. <p>Noise:</p> <ul style="list-style-type: none"> • Provide respite from noise through more green and tranquil spaces; <p>Cut noise from rail and underground trains on the Transport for London network through technology and maintenance programmes.</p>		
35.	<u>The London Health Inequalities Strategy, 2018</u>	<p>The overall aim is to ensure Londoners have the best opportunities to live a long life in good health “where nobody suffers because of who they are, or where they live”. Without intervention, the Strategy notes that the care Londoners need can become more complex and enduring. The Mayor is committed to ensuring that health and health inequalities are considered in all his work – a health in all policies approach.</p> <p>Five key aims have been identified to drive action over the next 10 years:</p> <ul style="list-style-type: none"> • Healthy Children: Every London child has a healthy start in life – 	SA objectives should take account of these aims in ensuring that health and wellbeing are key considerations.	The EAP should take into account this strategy where appropriate.

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		<p>providing children with environments that help them to play, eat, socialise and play well. Also helping children achieve a healthy weight.</p> <ul style="list-style-type: none"> • Healthy minds: All Londoners share in a city with the best mental health in the world – all Londoners to feel comfortable talking about their mental health and end the stigma that people face due to mental health problems. Also tackling rates of suicide. • Healthy places: All Londoners benefit from an environment and economy that promotes good mental and physical health, in particular addressing pollution and access to green spaces. • Healthy communities: London's diverse communities are healthy and thriving – ensuring Londoners feel empowered to act on things that affect their own and their communities' health and wellbeing. Supporting communities at risk 		

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		<p>of infection, such as HIV and TB.</p> <p>Heathy Living: The heathy choice is the easy choice for all Londoners – including access to affordable, healthy food and enabling people to be more physically active. Reducing tobacco, alcohol and drug misuse and harm, and reducing harm related problem gambling.</p>		
36.	<u>London Surface Water Strategy 2025-30</u>	The 2025–30 London Surface Water Strategy is a city-wide plan developed by the GLA to address surface water flooding (SWF) risks, prioritizing nature-based solutions like Sustainable Drainage Systems (SuDS) and fostering catchment-based partnerships across borough boundaries.	Potential for constraint/conflict between development proposals and surface water drainage – guidance seeks to limit and mitigate against it.	The EAP should promote the importance of effective design measures for managing surface water.
37.	<u>London Infrastructure Plan 2050</u>	This document examines the broad magnitude of London’s infrastructure needs (in transport, utilities and green infrastructure), the costs involved, how the infrastructure might be funded, where it is likely to be needed and how it can be delivered.	SA objectives should take account of these aims to ensure that new development is supported by adequate infrastructure to serve the needs of its occupants.	The EAP should seek developer contributions to mitigate the impacts of development.

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		<p>The Plan projects that a 70% increase in tube and rail capacity will be needed. This will be achieved through projects including Crossrail 2, increasing frequency on tube lines (to make the most of the existing network) and extending existing lines.</p> <p>For energy, the Plan refers to higher investment in zero-carbon electricity, developing further local energy projects and continuing to retrofit existing property to improve efficiency and reduce demand. To ensure better use of water, the Plan seeks the roll out of water meters combined with more sophisticated tariffs, water efficiency measures and in the longer term, encouraging waste water reuse.</p> <p>To keep pace with the projected population increase, the Plan estimates that an additional 9,000ha of accessible green space will be needed in London to meet existing standards. Existing parks and green spaces should also be better designed, planned and managed to deliver</p>		

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		<p>additional benefits, including mitigating flooding, improving air quality, cooling the urban environment and enhancing biodiversity and ecological resilience. The Plan also focuses on the need to improve understanding of the economic benefits of improved green infrastructure, e.g. from lowering demand on healthcare systems and preventing serious flooding incidents.</p> <p>The Plan identifies the need to raise digital connectivity in London to world class levels. The Plan states the Mayor's commitments to working with the telecoms industry to develop property connectivity ratings, using technology to address need in areas without fibre broadband and investigating the use of more effective methods of installing connectivity infrastructure, such as micro trenching for cables.</p>		

38.	<u>Accessible London: Achieving an inclusive environment (GLA 2014)</u>	<p>This Supplementary Planning Guidance (SPG) provides detailed advice and guidance on the policies which promote an inclusive environment in London. The SPG:</p> <ul style="list-style-type: none"> • Provides guidance on the policies contained in the London Plan regarding the promotion of an inclusive and accessible environment • Gives local planning authorities advice on how to implement these policies • Explains the principles of inclusive design and how these principles should be applied in London • Gives designers ideas on where to find good technical advice and guidance. • Provides disabled people, older people and others who experience barriers in the built environment with an understanding of what to expect from planning in London. • Identifies legislation and national planning policy guidance relevant to the promotion of an inclusive environment. 	SA objectives should take the Accessibility Strategy into account	The advice given in the Mayor's SPG should be followed in ensuring accessibility is a key consideration.
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		<ul style="list-style-type: none"> Provides signposts to other relevant London Plan SPG documents and Implementation Guides which impact on the delivery of an inclusive environment. 		

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39.	<u>Capital Gains: A Better Land Assembly Model for London</u> 2018	This report brings together the evidence and makes recommendations for changing the way land is assembled in London. It deals with the particular challenges facing London, and because it is aimed at harnessing land values for the city's benefit.	The SA objectives should ensure that the recommendations made in the report are considered.	The EAP should ensure that the recommendations are noted.

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40.	<u>The Mayor's Sustainable Design and Construction: SPG 2014</u>	<p>To support the policies in the London Plan this SPG includes guidance on:</p> <ul style="list-style-type: none"> • Energy efficient design • Meeting the carbon dioxide reduction targets • Decentralised energy • How to off-set carbon dioxide where the targets set out in the London Plan are not met • Retro-fitting measures • Support for monitoring energy use during occupation • An introduction to resilience and demand side response • Air quality neutral • Resilience to flooding • Urban greening • Pollution control • Basements policy and developments • Local food growing 	SA objectives should seek to promote sustainable design and construction.	Sustainable design and construction principles should be taken forward in the EAP.

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41.	<u>Social Infrastructure SPG 2015</u>	<p>This Supplementary Planning Guidance:</p> <ul style="list-style-type: none"> • Provides a range of information to evaluate the need for social infrastructure, such as the GLA's demographic projections; • Emphasises the need for planning across services to ensure social infrastructure meets the broader built environmental aims of the London Plan; • Provides advice on planning for 'Lifetime Neighbourhoods'; • Describes Department for Health models for service delivery; • Sets targets for the provision of burial space based upon projections of need and capacity; • Provides a range of resources for assessing planning applications for social infrastructure. 	SA objectives should seek suitable forms of infrastructure to meet local needs	The EAP should seek provision of social infrastructure where it is necessary to support development, taking into account wider planning and place-making objectives identified in the SPG.

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42.	<u>Shaping neighbourhoods – play and informal recreation SPG 2012</u>	<p>This document updates and replaces the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation published in 2008.</p> <p>It provides benchmark standards that are flexible enough to meet the varying needs of children and young people across London and should be used as a reference guide for boroughs in the development of their local standards.</p> <p>This guidance sets out responsibilities of Local Authorities, Developers and Consultants in addition to providing guidance to neighbourhood forums in shaping their neighbourhood plans. Local authorities have the responsibility of ensuring robust play strategies and establishing the overall context for implementation of the Supplementary Planning Guidance, as well as detailed roles in determining requirements for specific sites.</p>	SA objectives should seek to protect and increase play and informal recreation.	The EAP should seek to protect and increase play and informal recreation space with robust play strategies. This is particularly important in areas of deprivation around Euston.
43.	<u>Shaping neighbourhoods:</u>	The objectives of this SPG are to provide:	SA objectives should seek to ensure that character and context are	The EAP should seek to ensure that the physical attributes of

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	<u>character and context 2014</u>	<ul style="list-style-type: none"> • specific guidance on the attributes of character and context in London (physical, cultural, social, economic, perceptions and experience); • information on resources that inform an understanding of character and context in London; • an analysis of the interrelationships between different aspects of character, and how it can be articulated and presented to others; • examples of good practice in how an understanding of character and context can be used to help manage change in a way that sustains and enhances the positive attributes of a place. 	important factors in planning for neighbourhoods.	character and context are considered.
44.	<u>London View Management Framework SPG (March 2012)</u>	The London View Management Framework SPG provides guidance on the policies in the London Plan for the protection of strategically important views in London. The SPG explains how the views designated by the Mayor and listed in the London Plan are to be managed, and replaces the previous 2007 SPG.	SA objectives should reflect the importance of protecting the setting of important buildings.	EAP policies should reflect the established strategically important view corridors.

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45.	<u>Mayor London's Culture Strategy 2018</u>	<p>This strategy outlines an ambitious programme to sustain a city that works hard, and plays hard, for everyone; a city that is built on the principle of culture for all Londoners. It is themed around four priorities:</p> <ul style="list-style-type: none"> • Love London – more people experiencing and creating culture on their doorstep. • Culture and Good Growth – supporting, saving and sustaining cultural places and spaces. • Creative Londoners – investing in a diverse creative workforce for the future. • World City – a global creative powerhouse today and in the future. 	The objectives of the SA should ensure that the four priorities of the Strategy are reflected.	The Area Plan should help to achieve the objectives of the Mayor's Cultural Strategy by applying the policies at a local level.
46.	<u>Culture & the Night-Time Economy Supplementary Planning Guidance (SPG) 2017</u>	This SPG gives advice on implementing policies with a bearing on London's culture and the night-time economy.	The SA objectives should ensure the guidance in this SPG is followed in promoting the night-time economy and night-time cultural offer whilst achieving a balance with the needs of local residents and managing the impacts of the night-time economy.	The EAP should consider this guidance and implications for the Euston area.

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47.	<u>Crossrail Funding SPG updated March 2016</u>	The Mayor charges the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance such as Crossrail 2, and potentially other strategic transport infrastructure.	The objectives of this SPG should be followed.	The EAP should follow this guidance in relation to securing developer contributions.
48.	<u>Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy SPG</u>	The Mayoral Community Infrastructure Levy (MCIL1) was introduced in 2012 to help finance The Elizabeth Line (Crossrail), In February 2019 the Mayor adopted a new charging schedule (MCIL2). The new charges took effect on 1 April 2019 and supersede the MCIL1 charging schedule and the associated Crossrail Funding SPG (applicable in central London, the northern part of the Isle of Dogs and within 1km of a Crossrail station for the rest of London). The MCIL2 charges apply to all planning permissions granted. MCIL will be used to repay Elizabeth Line financing.	The SA will need to be mindful of the requirements of Mayoral charges.	The EAP should follow this guidance in relation to charging.
49	<u>Sustainable Transport,</u>	London Plan Policy T3 Transport capacity, connectivity and safeguarding requires Development Plans and	The SA should follow the objectives of this guidance document.	The EAP will need to take into consideration the requirements

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	<u>Walking and Cycling 2022</u>	development proposals to protect existing land for transport and support the enhancement of expanded public transport, walking and cycling networks through the provision of sufficient and suitably located land to serve London's needs. The guidance helps support planning authorities and applicants in meeting the requirements of Policy T3, as well as also supporting delivery against other policies including T1 Strategic approach to transport, and T2 Healthy Streets. It provides guidance to explain how Development Plans and development proposals should support walking, cycling and public transport.		of London Plan transport policies.
50	<u>The Control of Dust and Emissions during Construction and Demolition SPG (July 2014)</u>	<p>This SPG includes guidance on:</p> <ul style="list-style-type: none"> • preparing an Air Quality Statement for construction and demolition activities, including air quality (dust) risk assessments • the stages of development the Air Quality Statement is to cover: demolition, earthwork, 	The SA objectives should be consistent with the SPG.	The EAP should take into account the aim and policies of the SPG and where possible include policies to help achieve these aims.

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		<p>construction and 'trackout' (vehicles leaving the site)</p> <ul style="list-style-type: none"> identifying the potential scale (large, medium, small) of dust emissions for each stage of work identifying the level of risk due to the scale of dust emissions on health, 'soiling' (dirt) and the natural environment best practice methods for controlling dust on-site and to prevent 'trackout' recommendations for monitoring early notification of new 2015 and 2020 standards for non-road mobile machinery. 		
LOCAL:				
51	We Make Camden	"Camden 2025" refers to a community-driven vision for the borough of Camden developed by Camden Council and local residents and organizations to achieve a safe, fair,	Ensure that the missions of We Make Camden form part of the objectives and proposals in the SA Framework objectives and criteria	Strong links already exist between the EAP, Local Plan and Camden 2025. The EAP should reflect and help to implement the objectives.

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		<p>creative, and active community. It encompasses several interconnected strategies and plans created in partnership with the community to guide the borough's development and address challenges like housing, inclusive growth, community safety, and health and wellbeing.</p> <p>The 4 Missions in Camden to achieve over the coming years are: Diversity: By 2030, those holding positions of power in Camden are as diverse as our community – and the next generation is ready to follow Young people: By 2025, every young person has access to economic opportunity that enables them to be safe and secure Food: By 2030, everyone eats well every day with nutritious, affordable, sustainable food Estates and neighbourhoods: By 2030, Camden's estates and their neighbourhoods are healthy, sustainable and unlock creativity</p>		
52.	<u>Regulation 19 Submission Draft Local Plan 2025</u>	<p>The new Camden Local Plan sets out the Council's vision for future development in Camden over the next 15 years and includes the planning policies and site allocations to help</p>	<p>The SA objectives of the EAP should be informed by the policies and SA considerations of these plan documents.</p>	<p>The EAP is being updated in response to the Local Plan.</p>

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		<p>achieve this. Camden aims to deliver 11,550 additional homes (770 homes per year) from 2026/27 to 2040/41, prioritizing permanent self-contained housing to address affordability and overcrowding issues. The Council targets 3,000 additional affordable homes during the Plan period, with a mix of 60% low-cost rented housing and 40% intermediate housing.</p> <p>Key challenges and issues to be addressed through the Local Plan include:</p> <ul style="list-style-type: none"> • Meeting the need for housing in the borough; • Responding to the climate and ecological emergency; • Adapting to demographic change and supporting families to remain in Camden; • Creating a sustainable and inclusive economy and supporting the Central Activities Zone and Knowledge Quarter; 		

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		<ul style="list-style-type: none"> • Supporting Camden's town and neighbourhood centres and enabling them to thrive; • Tackling inequalities to ensure that everyone has the chance to succeed and no one gets left behind; • Promoting health and well-being and addressing health inequalities; • Ensuring that travel becomes healthier, safer, more inclusive, more affordable and more sustainable; • Making the Borough a safer place for all Camden's communities; and • Ensuring that new buildings and public spaces are designed to be safe, accessible, and inclusive, while respecting local context and responding to the distinctiveness of Camden's valued and special places. <p>Estate regeneration under Camden's Community Investment Programme focuses on improving housing quality, retaining existing affordable housing, and adding new affordable homes.</p>		

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		<p>Camden supports purpose-built student accommodation with a target of 200 additional bedspaces per year, requiring affordable student housing or contributions to affordable housing.</p> <p>Development must prioritize climate change mitigation and adaptation, including energy efficiency, renewable energy, sustainable transport, and biodiversity enhancement.</p>		
53.	Camden Planning Guidance	<p>Camden Planning Guidance provides advice and information on how the LBC applies its planning policies. Adopted CPG documents:</p> <ul style="list-style-type: none"> • Access for All CPG - March 2019 • Adverts CPG - March 2018 • Air Quality - January 2021 • Amenity - January 2021 • Artworks, statues and memorials CPG - March 2019 • Basements - January 2021 	SA objectives should be informed by the guidance outlined within this document.	The EAP should include reference to supplementary guidance where appropriate.

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		<ul style="list-style-type: none"> • Biodiversity CPG - March 2018 • Community uses, leisure and pubs - January 2021 • Design - January 2021 • Developer Contribution CPG - March 2019 • Digital Infrastructure - March 2018 • Employment sites and business premises - January 2021 • Energy efficiency and adaptation - January 2021 • Home improvements - January 2021 • Housing - January 2021 • Planning for health and wellbeing - January 2021 • Public open space - January 2021 • Student housing CPG - March 2019 • Town centres and retail - January 2021 • Transport - January 2021 		

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		<ul style="list-style-type: none"> • Trees CPG - March 2019 • Water and flooding CPG - March 2019 • These guidance documents support the policies in the Camden Local Plan. 		
54.	<u>Camden Infrastructure Delivery Plan 2025</u>	<p>The purpose of the Infrastructure Delivery Plan (IDP) is to assess the current level of infrastructure provision in Camden, and identify known projects and future needs, to support the delivery of the Local Plan. The IDP also supports the delivery of the Councils broader ambitions and priorities set out in We Make Camden, and other relevant Council plans and strategies, including those relating to climate change, health and wellbeing, diversity, affordable workspace, the evening and night-time economy, culture, libraries, community facilities, education, adult social care, families and children, open space, biodiversity and transport.</p> <p>This document aims to:</p>	The SA objectives should ensure the findings of this study are included.	The EAP should use this for reference.

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		<ul style="list-style-type: none"> • Establish the current level of infrastructure provision across Camden; • Identify known infrastructure projects, as set out in existing plans and strategies, or coming forward as part of approved schemes; • Assess future infrastructure needs to support housing and economic development; and • Inform infrastructure funding decisions, including Section 106 (S106) negotiations, Capital Programme allocations (including Strategic CIL), and Neighbourhood CIL application decisions. The Infrastructure Delivery Plan is intended to be a live document, reflecting the Council's and external partners current priorities. 		
55.	Camden Conservation Area Appraisals	The conservation area appraisals and management strategies define the special character of a conservation area and set out the approach for its preservation and enhancement. Conservation Areas of note for the Euston area are Regents Park (2011), Kings Cross/St Pancras (2003) and	SA objectives should be informed by the guidance outlined within these documents.	Guidance within the EAP should be consistent with the findings and recommendations of these documents.

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		Camden Town Conservation Area (2007).		
56.	Camden Character Study 2015	<p>The Character Study was commissioned to identify the character of parts of the Borough that had not previously been documented. Conservation Areas, public open space and Growth Areas were excluded.</p> <p>It describes various character typologies and areas and where opportunities for improvements might be sought that could improve the functioning of an area, address urban design or character weaknesses.</p>	SA objectives should be informed by the guidance outlined within this document.	Guidance within the EAP should be consistent with the findings and recommendations of this document.
57.	Local Housing Needs Assessment 2025	<p>The Assessment looks at housing needs in Camden for the period 2026-2041 to support the period of the Local Plan Regulation 19 Submission Draft. The document provides a comprehensive analysis of housing needs, affordability challenges, and potential solutions to guide Camden's housing and planning policies. The main themes include:</p>	This assessment informed the draft new Local Plan 2025. Relevant information should inform the SA.	The EAP should reflect the evidence and necessary updates conducted for the Local Plan.

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		<ul style="list-style-type: none"> • Housing Targets and Policy Context: Camden's proposed housing target of 11,550 dwellings over 15 years and alignment with the NPPF and the London Plan as well as changes in government policy, including updates to the NPPF and Planning Practice Guidance (PPG). • Demographic Projections: Population and household growth trends, including age-specific projections with shifts in household types, with a significant increase in older households. • Local Housing Market: Trends in housing tenure, including the decline in affordable rented housing and growth in private renting and analysis of housing costs, (including private rent, social rent, and homeownership affordability). Income thresholds 		

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		<p>required to access different housing options.</p> <ul style="list-style-type: none"> • Affordable Housing Needs: Current unmet needs, including homelessness, overcrowding, and concealed households. Future affordable housing needs, driven by new household formation and migration. Needs of households aspiring to homeownership but unable to afford market housing. • Housing Products and Affordability: Evaluation of affordable housing options, including Social Rent, Camden Intermediate Rent, Shared Ownership, and First Homes. Challenges in delivering affordable homeownership products due to high housing costs in Camden. • Specialized Housing Options: Potential roles of Build to Rent and co-living schemes in addressing housing needs. 		

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		<p>Consideration of housing for specific groups, such as students and older persons.</p> <ul style="list-style-type: none"> • Viability and Policy Implications: Balancing housing needs with development viability and prioritizing different housing needs within the constraints of Camden's housing delivery targets. • Evidence-Based Planning: Use of demographic, economic, and housing market data to inform housing policies and the integration of findings into a broader evidence base for Camden's Local Plan. 		
58.	<u>Economic Needs Assessment 2023</u>	The study sets out a detailed evidence base from which an appropriate supply and mix of employment land and premises can be planned for, and provides a strategy for balancing supply and demand.	This assessment informed the Local Plan 2025. Relevant information should inform the SA.	The EAP should reflect the evidence and necessary updates conducted for the Local Plan.
59.	<u>Camden Local Plan</u>	This report tests the ability of developments in the London Borough of Camden to accommodate the	This Study informed the Local Plan 2025. SA objectives for the EAP	The EAP Update viability should be consistent with this Study..

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	<u>Viability Study 2025</u>	policies in the draft New Camden Local Plan alongside prevailing rates of Community Infrastructure Levy ('CIL'). It seeks to provide information on the viability impacts of the draft plan policies and adopted CIL rates on different types of development across the Borough and in relation to specific sites.	should reflect the need for development to be viable..	
60.	<u>Retail and High Streets Needs Assessment 2024</u>	<p>The study takes account of current and predicted market trends, and the recent impact of the pandemic on town centres and high streets as places to shop, live, work, study and visit for a wide range of uses and activities.</p> <p>The UK has experienced major economic and social events (e.g. COVID-19, energy and cost of living crisis, inflation and a rise in interest rates) that have impacted on how we shop, work and use our town centres. As such, the assessment provides town centre evidence to ensure that the policies within the emerging Local Plan continue to be appropriate and capable of providing the policy guidance</p>	SA Objectives should reflect the findings of the study in terms of retail floorspace provision.	The EAP should provide a consistent approach to encouraging vitality and viability and protecting and enhancing retail floorspace.

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		required to achieve the Council's development objectives.		
61.	<u>Gypsy and Travellers Site Identification Study 2024</u>	<p>The main objective of the Study is to provide the Council with up-to-date evidence about the accommodation needs of Gypsies and Travellers and Travelling Showpeople in the Local Plan period</p> <p>This led to recommendations for future pitch provision, transit sites and Travelling Showperson requirements.</p>	This assessment informed the Local Plan 2025. Relevant information should inform the SA.	The EAP should consider the evidence and necessary updates conducted for the Local Plan.
62.	<u>Camden Clean Air Action Plan 2023-2026</u>	The Camden Clean Air Strategy 2019-2034 sets out strategic objectives for realising the vision for a borough in which no person experiences poor health as a result of the air they breathe. The Camden Clean Air Action Plan 2023-2026 describes the actions that we will take over the next four years (2023-2026). This follows on from the previous Camden Clean Air Action Plan 2019-2022. This document goes beyond the legal requirements by committing to more ambitious air quality standards and including	SA objectives should seek to enhance air quality wherever possible.	EAP Environment Strategy should contain policies which reflect the findings of the Plan and seek to improve air quality in the Euston area.

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		pollution sources not usually addressed by local authorities.		
63.	<u>Strategic Flood Risk Assessment 2024</u>	<p>The SFRA provides a strategic overview of flood risk to enable effective risk-based strategic planning for the future and supports development of the Camden Local Plan.</p> <p>Flooding from surface water and sewer sources pose the greatest risk to the London Borough of Camden. The risk is interconnected, due to the prevalence of the combined sewer system which serves the Borough. Historic flood events, such as that of 1975, 2002 and 2021, suggest high volumes of surface water are conveyed overland due to the extent of impermeable surfaces and lack of infiltration. Multiple reports of internal and external property flooding have been linked to surface water sources. The large volume of water conveyed over land enters the Thames Water Utilities Limited combined sewer system. Flood incidents have been linked to surcharge of the sewer</p>	Flood risk should be taken into account in developing objectives and should incorporate or reflect regional or strategic flood risk assessments.	The EAP should take a risk-based approach and consider flood risk in accordance with guidance and consider ways to promote sustainable drainage systems alongside the more sustainable use of water.

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		network at several locations (i.e., where the entrance and exits of assets such as manholes and pipes are submerged) as a result of blockages and hydraulic overload.		
64.	<u>London Borough of Camden Annual Monitoring Report 2023-4</u>	<p>The Authority Monitoring Report contains information on key indicators regarding the implementation of Camden's planning policy documents. The document reports on these indicators and the extent to which planning policies are being achieved. The document records key statistics on:</p> <ul style="list-style-type: none"> • Housing • Employment Space • Town Centre Uses and Retail • Design • Sustainable Development • Transport • Heritage • Basements 	SA objectives and baseline reports should be informed by the information presented within this report.	The EAP should ensure that its policies recommend a course of action that can be monitored via this report.
65.	<u>Housing Trajectory 2026-2040</u>	The housing trajectory shows how sites are expected to come forward to meet the housing target proposed by the Submission Draft Camden Local Plan.	SA objectives should be consistent with the trajectory.	The EAP Update Landuse Strategy should be consistent with the trajectory.

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		For this purpose, the housing trajectory includes all self-contained and non-self-contained homes and covers the fifteen years of the Local Plan period – starting with 2026/27 and concluding with 2040/41.		
66.	<u>North London Waste Plan 2022 and North London Joint Waste Strategy 2025-2040</u>	The plan provides a set of agreed priorities for delivering sustainable waste management in North London	The SA should be consistent with the overarching principles.	The EAP should be consistent with the aims of the Plan.
67.	<u>Camden Health and Wellbeing Strategy, 2022-30</u>	This strategy sets out the shared principles, long-term ambitions and short-term priorities of the Camden Health and Wellbeing Board for improving health and wellbeing and reducing health inequalities. It presents our population health approach and identifies how we will respond to the disproportionate impacts of Covid-19, working closely with our residents and communities.	The SA objectives should ensure that the contents of the strategy is taken into account.	The EAP should help to address the health needs recognised in this study.
68.	<u>Healthy Streets, Healthy</u>	The Camden Transport Strategy seeks to transform transport and mobility in Camden, enabling and encouraging	SA objectives should be consistent with the Transport Strategy objectives	The EAP should be consistent with the Transport Strategy as it relates to spatial planning

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	Travel, Healthy Lives: Camden Transport Strategy 2019-2041	people to travel sustainably; nurturing healthier lifestyles; creating radically less polluted places; and upgrading the transport network to meets Camden's needs and those of London as a growing capital city		matters and where possible, should seek to achieve the aims of the Strategy throughout the planning process.
69.	Camden Biodiversity Action Plan Creating space for nature in Camden	Camden's Biodiversity Action Plan (the Plan) was adopted in January 2022 alongside the Biodiversity Strategy 'Creating space for nature in Camden1' (the Strategy). The actions within the Plan contribute to the delivery of the objectives within the Strategy. Unlike the Strategy, which is reported against and revised every five years, the Action Plan is a live project list. As such it is subject to occasional revision within the strategy period (January 2022 - December 2026).	Changes in priority species and habitats could be a sustainability indicator to measure whether the EAP is helping to protect and enhance biodiversity.	The EAP should seek to protect and enhance the biodiversity the borough, and particularly priority species and habitats.
70.	Camden Climate Action Plan 2020-2025	The Climate Action Plan proposes a five-year programme of projects and activities around the themes of People, Places, Buildings and Organisations that deliver on the 17 Citizens' Assembly recommendations and bring to life the vision of a zero carbon	The SA objectives must take into account the guiding principles of the Climate Action Plan.	The EAP should reflect and build upon the aims of the Climate Action Plan.

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		<p>Camden. The vision is to achieving a net zero carbon Camden by 2030.</p> <ul style="list-style-type: none"> Highlights of the plan include increasing the number of segregated cycle routes, requiring all new major developments to be zero carbon and switching the Council's energy supplies to 100% renewable sources. 		
71.	<u>Camden Annual School Places Planning 2024</u>	<p>Every year, Camden Council reviews its school places planning projections for the primary and secondary sectors. The latest report (2024) highlights that over the last 5 years there has been a significant reduction in demand for school places within Camden and the wider London area. Forecasts of pupil demand have also been created in times of unprecedented change and challenge for families in Camden. Specifically, the effects of the COVID-19 pandemic have fundamentally altered people's lives and changed patterns of migration within central London and Camden Borough specifically. The impacts of these have</p>	<p>The SA should take account of this evidence and any updates in assessing need.</p>	<p>The EAP and supporting evidence should reflect the findings of this report.</p>

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		reduced the anticipated level of demand for school places across the Borough.		
72.	Camden Open Space, Sport and Recreation Study Review; Atkins; 2014	This builds on previous studies to provide an update and analysis of different types of urban greenspace in the Borough including indoor and outdoor sports facilities. The study assessed the quantity, quality and accessibility of open space in the Borough.	SA objectives should reflect the key findings of the study.	The EAP should contain policies which are consistent with the study.
73.	Camden's Reduction and Recycling Plan 2023-2025	This Plan drives and promotes local activity that will also play an important role helping to achieve the Mayor's London-wide targets to cut food waste by 50 per person and achieve 65 per cent municipal waste recycling by 2030.	The SA objectives should take account of this Plan in reducing waste and encouraging recycling.	The Area Plan should be consistent with the Plan and reflect the key aims and seek to reduce waste.
74.	Delivering Net Zero	A study to provide evidence base in relation to energy use and carbon emission modelling for eight common building types in London. The Study shows that significant progress has already been made up to 2016. It is clear that a significant proportion of that progress has been through decarbonisation of the grid - much of	The SA objectives should be mindful of the recommendations of this Study.	The Euston Area Plan should be consistent with the recommendations of the study.

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		<p>this happened nationally through the switch from coal to gas fired power generation and wind power – though Camden has played a part in this through installations of gas CHP and solar PV – both of which are included in the national electricity emission factor figures. The challenge now, as grid decarbonisation continues, is to decarbonise heat and transport - and Camden’s role in this is arguably more significant in these sectors.</p>		
75	Camden's Adaptation and Resilience Plan (2023 to 2025)	<p>This Climate Adaptation and Resilience Plan 2023-2025 is a two-year action plan designed to build understanding of how climate hazards, such as flooding, and heat risk will affect Camden, while devising a set of activities to improve the borough’s resilience to them. The Plan recognises that the impacts of climate crisis will be felt unevenly and members of the community with greater vulnerability to climate hazards will require the most support. The Plan also considers the risk that climate hazards will present to our infrastructure and physical assets,</p>	<p>The SA objectives should be mindful of the recommendations of this Plan.</p>	<p>The Euston Area Plan should be consistent with the Resilience Plan in terms of a comprehensive understanding of climate risks.</p>

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		council services, nature and biodiversity and the local economy.		
EUSTON SPECIFIC				
77	<u>Euston Open Space Study part1</u> <u>Euston Open Space Study part2</u> <u>Euston Open Space Study part3</u>	<p>The study has the following aims:</p> <ul style="list-style-type: none"> - updates the evidence base for open space and play space to inform an updated EAP, - audits and assesses the quantity, quality, value and accessibility of open space across the EAP area - undertake an assessment of projected future open space requirements, taking into account future growth. - sets out the current and future 'need' for open space. - provides recommendations on priorities for future open space requirements. 	The SA objectives will take into account the findings of this study.	The Euston Area Plan should be consistent with the recommendations of the study.
78	Euston Economic Impact Assessment	The Study assesses the transformational economic and place-making opportunities linked to the Euston station broader area redevelopment, which has the potential to contribute 34,000 jobs, 2,500 homes, and £41bn to the economy by	The SA takes into account the opportunities that development can bring in economic terms.	The EAP Update is mindful of the numerous benefits that the transformation of Euston can bring.

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		<p>2053. The Economic Impact Assessment is based on a development scenario for Euston that development partners have prepared in response to the Government's objectives for the development. As part of the economic model, Metro Dynamics also tested a range of scenarios for development, to demonstrate how the benefits could vary for larger, taller, and smaller developable areas, and faster development.</p>		
79	Retail Planning Issues report 2022	<p>This report on Retail Planning Issues was prepared by Avison Young ('AY') for the London Borough of Camden in relation to the Euston Action Plan Update. It is part of two inter-related pieces of work: a Land Use Mix Report and a Deliverability and Viability Assessment. This document provides:</p> <ul style="list-style-type: none"> • a review of the robustness of the existing evidence base informing the adopted Euston Area Plan; 	The SA should take account of this evidence and any updates in assessing retail need.	The findings of this report will influence policies in the EAP Update.

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		<ul style="list-style-type: none"> • a partially updated evidence base (including a review of land use provision in defined 'town centres' in the surrounding area); • updated retail and leisure floorspace need forecasts (including an impact assessment of the proposed retail and food/beverage floorspace); and • advice on planning policy associated with retail, leisure and town centre issues. 		
80	Euston Area Plan sports needs assessment 2022	This report by Knight Kavanagh & Page delivers an up-to-date review of the supply and demand needs assessment of sports facilities in the borough of Camden considering the current and future demographic of Euston and the HS2 development area.	The SA should take account of this evidence and any updates in assessing the requirements for providing sports facilities.	The EAP Update will use the findings of this Report.
81	Health Impact Assessment	Health Impact Assessment (HIA) is a practical approach used to judge the potential health effects of a policy, programme or project on a	The HIA helps identify those determinants of health which are likely to be influenced by specific development policies	The Health Impact Assessment (HIA) assessed the potential health impacts of the Plan and

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		<p>population, particularly on vulnerable or disadvantaged groups. Recommendations are produced for decision-makers and stakeholders, with the aim of maximising the proposal's positive health effects and minimising its negative health effects.</p> <p>The Health Impact Assessment of the updated Euston Area Plan approaches the potential health impact of the updated Euston Area Plan through two lenses:</p> <ul style="list-style-type: none"> • Its alignment with the direct and indirect aims of improving health and reducing health inequalities described in <i>We Make Camden</i> and the Joint Health and Wellbeing Strategy, and the policies in the draft Local Plan; and • An assessment those determinants of health which are likely to be influenced by specific development policies 		<p>found that overall, the updated Euston Area Plan has a positive impact on improving health and reducing inequalities, particularly the inclusion of Health and Wellbeing as a key strategic principle. On the recommendation of the HIA, the EAP was updated to more explicitly reference the health risks from construction, loss of open space, and air quality impacts during the construction phase.</p>

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		within the updated Euston Area Plan using the NHS London Healthy Urban Development Unit's Rapid Health Impact Assessment Tool		
82	Equalities Impact Assessment and note	This EQIA identifies which policies have been amended or are new to the Update, and, in assessing each policy, whether any could result in negative or positive impacts. Assessments of suggested EAP policy updates are set out below and identify potential outcomes related to the protected groups where possible. The proposed updates to the EAP are expected to continue to have a positive impact (as with the EAP 2015) through the provision of additional homes and jobs, a significantly enhanced urban environment, improved connectivity through the area, better streets and space and, improved transport infrastructure.	The SA considers inequalities and the chance to maximise social value.	The EAP Update will need to ensure that new development contributes to reducing inequalities and increasing life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed, maximising social value increases this potential further. It is considered that all groups will benefit in some way from the proposed updates in the EAP.

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83	Euston Area Plan Historic Area Assessment 2014	This assessment identifies and describes character areas, assesses their relative architectural and historic importance and provides an evidence base for retaining areas of distinctive character. It examines the components of the historic environment and the relationships between them.	The SA considers heritage and historic buildings.	The EAP Update seeks to ensure that development complements the character and heritage of the area
84	Euston Area Plan Energy Masterplan report 2013	The study aims to identify the potential opportunities to connect a mix of new and existing buildings in the Euston area to a district heating network as a means of providing the community with low cost, low carbon heat.	The SA should take account of this evidence and any updates	The EAP Update seeks to ensure that energy use is efficient
85	Euston Planning Brief – Community-led heritage assessment – October 2019	This document presents an assessment of the heritage of the area which was done for the Euston Planning Brief and its immediate surroundings. Much of this heritage is formally recognized, through statutory listing, local listing, and designation within a conservation area. The assessment also assesses what local communities identify and value. The assessment highlights that heritage is a	The SA takes account of historic buildings and heritage assets.	The EAP Update seeks to ensure that development complements the character and heritage of the area

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		critical context for the successful redevelopment of Euston Station.		

APPENDIX F: Updated baseline data (separate document – to be published alongside)