

# Euston Area Plan

## Representation Form Guidance Note

### 1. Introduction

- 1.1 The Euston Area Plan (EAP) has been prepared to shape change in the Euston area up to 2031 years. It is being prepared jointly by the London Borough of Camden (LBC), the Greater London Authority (GLA) and Transport for London (TfL). The plan area is centred around Euston Station and covers Regent's Park Estate to the west and part of Somers Town to the east. To the north, the plan boundary includes Mornington Crescent station, as well as the railway tracks running up to Parkway. To the south, the plan boundary includes Euston Road.
- 1.2 The Euston Area Plan is being produced to respond to the proposed new High Speed Two (HS2) rail link, as well as reflecting and updating previous plans and aspirations for development in and around the station. Camden Council strongly opposes the HS2 project as it is concerned about the potential negative impacts on the areas affected by its construction, particularly around Euston and Camden Town. However if HS2 goes ahead, despite Camden Council's objections, it is important that the Council plans ahead to get the best possible results for local people and businesses and to make the most of any potential benefits a new station and rail link could present. If HS2 does not go ahead, the Plan will be useful in refreshing previous plans and encouraging growth back into the Euston area.
- 1.3 The Euston Area Plan has been published in order for representations to be made prior to submission to Government. Once submitted, the representations will be considered alongside the published document by a Planning Inspector during a public examination. The Planning and Compulsory Purchase Act 2004 (as amended)<sup>1</sup> (the 2004 Act) states that the purpose of an examination is to consider whether a document complies with the legal requirements and is 'sound'.
- 1.4 This guidance note provides information on:
- how to submit your response or representation(s)
  - general advice on making representations
  - government requirements in terms of 'soundness' and legal compliance

### 2. How to submit your responses

- 2.1 Your comments need to be submitted in writing, using the representations form which is available:
- at Camden Town and St Pancras Libraries,
  - to download for the EAP website at [www.eustonareaplan.info/get-involved](http://www.eustonareaplan.info/get-involved)
  - on request by contacting the Euston Area Plan Team on 020 7974 6805 or at [eustonareaplan@camden.gov.uk](mailto:eustonareaplan@camden.gov.uk)
- 2.2 The period for representations to be made runs for eight weeks from **8th January to 5<sup>th</sup> March 2014**

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<sup>1</sup> View the 2004 Act at:

[http://www.opsi.gov.uk/acts/acts2004/ukpga\\_20040005\\_en\\_1](http://www.opsi.gov.uk/acts/acts2004/ukpga_20040005_en_1)

View the amending 2008 and 2011 Acts at:

[http://www.opsi.gov.uk/acts/acts2008/pdf/ukpga\\_20080029\\_en.pdf](http://www.opsi.gov.uk/acts/acts2008/pdf/ukpga_20080029_en.pdf) and

<http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

2.3 You can submit your representation(s) in the following ways:

- by email to: [eustonareaplan@camden.gov.uk](mailto:eustonareaplan@camden.gov.uk)
- Online using the representation form at: [www.eustonareaplan.info/get-involved](http://www.eustonareaplan.info/get-involved)
- post to: Euston Area Plan  
London Borough of Camden,  
Town Hall Extension, Argyle Street,  
London WC1H 8EQ

For other information please contact the Euston Area Plan Team on 020 7974 6805

### 3. Filling in the representation form

3.1 If you wish to provide more than one representation, please fill in Section A once and provide an individual copy of Section B for each representation.

3.2 Where there are groups who share a common view on how they wish to see the plan changed it would be very helpful for that group to send a single representation, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

#### 3.3 Questions 1 and 2

Please indicate which issue your representation relates to and indicate which section of the Euston Area Plan your representation relates to.

#### 3.4 Questions 3 and 4

To answer these questions, you first need to decide whether the plan is 'sound' or legally compliant (see sections 4 and 5 of this note for more information). If you consider the document to be unsound, please tick the option(s) in question 4 to which your representation relates.

#### 3.5 Question 5

Please give as much detailed information as possible regarding the reason why you think the plan is unsound or not legally compliant. You should try to support your representation by evidence showing why the document should be changed. It will be helpful if you also say precisely how you think the document should be changed.

#### 3.6 Question 6

Please provide details of what change(s) you consider necessary to make the document legally compliant or sound, having regard to the option you have identified in question 4 where this relates to soundness and the reasons provided in your answer to question 5. If possible please provide your suggested revised wording of the identified section in a concise manner. This will help the Council to review and respond to your suggested alteration(s).

#### 3.7 Questions 7 and 8

Please indicate whether you consider it necessary to participate in the oral part of the examination. If so, please justify why you believe it is important to participate at the oral part of the examination.

#### 3.8 Question 9

Please use this box to include any general comments. Please note however that if your comment does not relate to legal compliance and soundness it may not be considered by the inspector.

## 4. Soundness

- 4.1 Soundness is explained fully in the National Planning Policy Framework in paragraph 182 and the boxed text<sup>2</sup>. The Inspector has to be satisfied that the document is justified, effective, positively prepared and consistent with national policy.
- 4.2 To be sound the Euston Area Plan should be justified, effective, positively prepared and consistent with national policy. We have set out a few explanation notes below on these tests, but please refer to the National Planning Policy Framework document and information available at the Planning Advisory Service website at: <http://www.pas.gov.uk/> for formal guidance.

### Positively prepared

This means the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF has 12 principles through which it expects sustainable development can be achieved.

### Justified

This means that the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence, which includes:

- Evidence of participation of the local community and others having a stake in the area
- Research/fact finding: the choices made in the plan are backed up by facts

The plan should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

### Effective

This means the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. The plan should show:

- Sound infrastructure delivery planning
- Have no regulatory or national planning barriers to delivery
- Delivery partners who are signed up to it: and
- Coherence with the strategies of neighbouring authorities
  
- The plan should also be flexible and able to be monitored

The plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the plan should make clear that major changes may require a formal review including public consultation. Any measures

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<sup>2</sup> View at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

## **Consistent with national policy: enabling the delivery of sustainable development**

The plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

If you think the content of the plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by any national planning policy or in the London Plan? If so, it does not need to be included.
- Is what you are concerned with covered by any other policies in the plan on which you are seeking to make representations or in any other document in Camden's Local Development Framework (LDF). There is no need for repetition between plans.
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

## **5. Legal Compliance**

5.1 You should consider the following before making a representation on legal compliance:

- The Euston Area Plan should be within the Council's current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work which sets out the documents Camden propose to produce for the Local Development Framework over a 3 year period. It sets out the key stages in the production of any documents which Camden propose to bring forward for independent examination. If the Euston Area Plan is not in the current LDS it should not have been published for representations. The LDS is available on our website [www.camden.gov.uk/ldf](http://www.camden.gov.uk/ldf)
- The process of community involvement for the plan should be in general accordance with Camden's statement of Community Involvement. The Statement of Community Involvement (SCI) sets out our strategy for involving the community in the preparation and revision of LDF documents and the consideration of planning applications.
- The plan should comply with the Town and County Planning (Local Planning) (England) Regulations 2012<sup>3</sup>.
- Camden Council is required to provide a Sustainability Appraisal Report when they publish the plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
- The Plan should have regard to national policy and conform generally to the London Plan. The London Plan sets out the region's policies in relation to the development and use of land and forms part of our development plan.
- The plan must have regard to the Sustainable Community Strategy. In Camden the Community Strategy (Camden Together) was prepared by the Local Strategic Partnership which is representative of a range of interests and sectors in the Borough e.g. health,

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<sup>3</sup> View the 2012 Regulations at: <http://www.legislation.gov.uk/uksi/2012/767/contents/made>

housing, police. The Community Strategy was subject to extensive local consultation but not to an independent examination.

Further detailed guidance on the preparation, publication and examination of LDF documents is provided in *the National Planning Policy Framework* and at the Planning Advisory Service website at: <http://www.pas.gov.uk/>.