

Via email

8 October 2026

To the Planning Inspectorate,

Submission of the Euston Area Plan Update for Examination

The London Borough of Camden is pleased to submit the Euston Area Plan Update (EAP) Update Proposed Submission Draft to the Secretary of State for Housing, Communities and Local Government for independent examination in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

We consider that the EAP Update Submission Draft is sound and legally compliant.

The EAP Update Proposed Submission Draft sets out the Council's vision for future development in the Euston area over the next 25 years and includes the planning policies and site allocations to help achieve this.

It was produced to promote a high-quality redevelopment of Euston Station area and to shape change in this transitional area maximising regeneration potential in the period to 2031. The Plan is now being updated to reflect changes since adoption with the period extended up to 2051.

The area has been identified as a location for significant numbers of new homes and jobs in both the London Plan and Camden Local Plan for a number of years. The plan responds to the impact of the High Speed Two (HS2) terminus at Euston and updates previous plans and aspirations for the area.

The plan seeks to secure any potential benefits that development could bring to the area for both local residents and businesses and for London as a whole, whilst helping to mitigate the local impacts of development on local communities. Identifying locations for new and replacement homes, jobs, open space and other supporting infrastructure.

The EAP Update also has an important role in shaping how places in the Euston area will look and feel, promoting inclusion, reducing inequality, enhancing the environment, tackling climate change and securing sustainable neighbourhoods, helping to deliver the objectives of the Camden Local Plan and with the delivery of the ambitions, missions and challenges identified in We Make Camden, the Council's corporate strategy, and other local priorities set out in plans and strategies prepared by the Council and other bodies.

The EAP Update will ensure that Camden continues to have robust, effective and up-to-date planning policies that respond to changing circumstances and the unique characteristics of Euston. It covers the period from 2026 - 2051. Once adopted it will replace the current EAP (2015) and relevant site allocation policies in the Camden Site Allocations Plan (2013). A full schedule is set out in Appendix 1. Policy Replacement Schedule of the EAP Update document.

Preparation of the draft EAP Update

The process to update the EAP started in 2020 with the decision by Cabinet to undertake a partial update of the plan. The Update has included four stages of public engagement: Initial 'call for sites' in 2021; consultation on the Regulation 18 Draft EAP Update (2023); 'supplementary consultation' in light of Government announcements on Euston in 2024 and consultation on the EAP Proposed Submission Draft Regulation 19 stage in 2026.

Main issues arising from the consultation on the EAP Update Proposed Submission Draft

The EAP Proposed Submission Draft was published for consultation for a period of 8 weeks from 9th January 2026 until 3rd March 2026, to enable residents, businesses, community groups, landowners and other key stakeholders to share their views on the soundness of the Plan. In total we received approximately 500 comments on the EAP from 66 respondents. Of these, approximately 24 respondents have notified the Council that they wish to participate in the examination, subject to the agreement of the Inspector.

A summary of the issues raised through the consultation and the council's response to these is set out in our Regulation 22 Consultation Statement. Full copies of the responses are available to view in the Consultation Response Database and PDFs of the responses are also provided in responder ID order. These documents have been submitted to PINS via email and are available to view on the examination pages of the EAP website [Euston Area Plan | EAP Update Examination](#)

To assist the Inspector in their examination of the Plan we have also identified what we consider to be the main issues to be addressed through the examination of the EAP, based on the consultation responses received, and set out our response to them in Appendix 1 to this letter.

Schedule of Proposed Modifications

When agreeing to submit the EAP Update Proposed Submission draft to the Planning Inspectorate for public examination, the Council approved a Schedule of Proposed Modifications to be submitted to PINS and also delegated authority to the Director of Economy, Regeneration and Investment, following consultation with the Cabinet Member for Planning and a Sustainable Camden to make appropriate changes.

This schedule is intended to address minor points that have been mainly raised as part of the consultation on the EAP Proposed Submission Draft and subsequent discussions with

stakeholders where appropriate. We propose to submit a Schedule of Proposed Modifications to PINS by 31 October 2026.

Main Modifications

In accordance with section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended), the Council requests that the Inspector recommends main modifications, as necessary, to make the Plan sound and legally compliant (the Council has ensured the appropriate delegation for their approval is in place). Please treat this letter as our formal request, required under the legislation.

Duty to Co-operate

The Council has produced a Duty to Co-operate Statement which sets out how the London Borough of Camden has co-operated with other bodies in the preparation of the EAP Proposed Submission Draft. This is also supported by a series of Statements of Common Ground with neighbouring local authorities and key stakeholders.

Examination Document Library

Appendix 2 to this letter includes a list of documents that have informed the preparation of the EAP Proposed Submission Draft. The submission documents have been submitted to PINS. The remaining documents are available to view on the EAP website examination pages [Euston Area Plan | EAP Update Examination](#) (along with the submission documents).

The Council are currently preparing a number of topic papers to assist the Inspector by providing further information on the approach taken in the Plan. We propose to submit the topic papers to PINS by 30 October 2026.

Programme Officer

The Council has appointed Pauline Butcher as the Programme Officer for the examination of the EAP. The contact details for Pauline are as follows:

Name: Pauline Butcher

Email: CamdenLPP02025@outlook.com

Telephone: 07593 967301

Examination in Public Hearing Sessions

The Council estimates that we will need approx. 3 sitting days for the hearings, however this is only an approximate estimate at this stage and will depend on the range and complexity of the matters, issues and queries to be identified by the appointed Inspector.

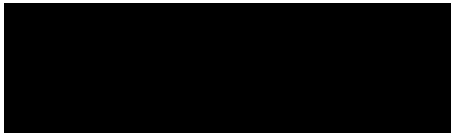
The council is willing to host both in person hearing sessions and/or virtual hearings as the Inspector considers necessary.

Submission Notification

Notification will now be sent to all those who have commented on the EAP Update Proposed Submission Draft, requested to be kept informed of progress on the EAP, or have been asked to notify them when we have submitted the EAP for examination. We will also notify specific and general consultees.

We look forward to working with the Planning Inspectorate on the examination of the EAP Update.

Yours sincerely,



Therese Gallagher

Euston Manager

Appendix 1 - Main Issues raised through the consultation on the EAP Proposed Submission Draft

The table below sets out a summary of what the Council considers to be the main issues raised through the consultation on the EAP Proposed Submission Draft. It should be read in conjunction with the Regulation 22 Consultation Statement and Regulation 19 Response Database submitted to PINS.

Summary of Comment	Council Response
Support for the EAP Update A number of responses were received highlighting support for the Euston Area Plan Update Proposed Submission Draft.	Support welcomed
Request for bespoke affordable housing and workspace policies The Landowner's Representative submitted a response which suggested that the EAP should be a self-contained development plan with a completely new set of policies instead of relying in parts on the Local Plan. Highlighting that they consider that there needs to be bespoke affordable housing and workspace requirements with a specific evidence base.	the Council consider that the existing policy framework, provided by the Local and London Plans includes sufficient flexibility to account for variances in viability and that bespoke policies for affordable housing and workspace are not necessary in the EAP, nor are they justifiable given the level of information available at this stage. The evidence base reflects the best information available. Given the prolonged nature of the scheme and the uncertainty around designs and costs, the viability information is consequently limited at this stage. The Council worked closely with land owners to establish inputs into the work in line with national guidance and both parties recognised the limitations of the available information. Coupled with the flexibility in the existing London and Local Plan policies and the recognition that the viability could change over the 25+ years of the EAP Update, it is considered appropriate to seek affordable housing and affordable workspace in line with Local Plan and London Plan policies. Proposed modifications discussed as part of the examination of the Local Plan and in response to the Reg 19 consultation on the EAP Update provide extra clarity on this and highlight the particular challenges with the Euston masterplan area.

Consultation Concerns were raised about the consultation carried out on the Plan. This was largely in relation to site allocations at 250 Euston Road (EA4) and Euston Square Hotel (EA5)	The Council has complied with the consultation requirements set out in Regulation 18 and the Camden's Statement of Community Involvement. In the July 2024 consultation (Regulation 18), 250 Euston Road was identified as a site allocation. For the Regulation 19 consultation, a further site allocation was identified at Euston Square Hotel (EA5) and 'Development and Design Principles' were provided for this site; and 250 Euston Road (EA4) was now identified as a potential location for taller buildings with the provision of an indicative height as well as detailed 'Development and Design Principles'. Through the Regulation 19 consultation process, the Council has had the opportunity to take account of the consultation responses and have proposed modifications in response to these.
Site Allocations A number of responses were received in relation to 250 Euston Road and Euston Square Hotel issues raised include: • Impact on Tolmers Square properties • Height of proposed tall building • Construction impacts • Impact on open space • Loss of current health uses	Proposed changes to site allocation, to include: • reference to health uses, • clearer expectations around retention of existing building and open space • reduction in proposed height.
Heritage Historic England, the Regent's Park Conservation Area Advisory Committee and St Paul's Cathedral submitted responses relating to the heritage impact of the proposals – highlighting concerns about the potential impact of tall buildings.	Proposed modifications have been discussed with Historic England and are suggested in order to provide greater clarity with specific reference to heritage assets and existing policies.
Open Space HS2 and the Euston Landowners submitted a response which sought clarity on the HS2 Act and Undertakings in relation to open space. Local resident groups highlighted the need for a strategy to apply to the whole area.	Proposed modifications which seek to address HS2's concerns are being discussed and proposed modifications are in the process of being drafted.

Appendix 2 - Examination Document Library

This is a list of the Council's submission documents, topic papers and evidence base. This is a working document and will be updated as the examination progresses. Where a document is still in progress this is noted below.

Submission Documents (SD)

Document Reference	Document	Date	Author
SD01	Submission Letter to PINS	October 2026	LBC
SD02	Euston Area Plan Proposed Submission Draft	September 2026	LBC
SD03	Sustainability Appraisal of the Euston Area Plan Proposed Submission Draft	January 2026	LBC
SD04	Sustainability Appraisal of the Euston Area Plan Proposed Submission Draft - Non Technical Summary	2025	LBC
SD05	Camden Local Development Scheme	September 2026	LBC
SD06	Habitats Regulations Assessment Screening	October 2025	LBC
SD07	Equalities Impact Assessment of the Euston Area Plan Proposed Submission Draft	September 2025	LBC
SD08	Health Impact Assessment of the Submission draft Euston Area Plan Update	January 2026	LBC
SD09	Euston Area Plan Update Proposed Submission Draft 2026 Statement of Fact and Statement of Representations Procedure	January 2026	LBC
SD10	EAP Update Proposed Submission Draft Policies Map	January 2026	LBC
SD11	EAP Update Proposed Submission Draft Policies Map –full borough	February 2026	LBC
SD12	Statement of Community Involvement	April 2024	LBC
SD13	EAP Monitoring Indicators	In progress	LBC

Document Reference	Document	Date	Author
SD14	Statement of Co-operation	October 2026	LBC
SD15	Legal Compliance Statement – Pre-examination checklist	October 2026	LBC
SD16	PINS response to examination checklist	May 2026	PINS
SD17	GLA General Conformity Statement	Consultation response	GLA
SD18	Statement of Common Ground with the GLA	October 2026	LBC
SD19	Statement of Common Ground with City of London	October 2026	LBC
SD20	Statement of Common Ground with LB Islington	October 2026	LBC
SD21	Statement of Common Ground with LB City of Westminster	October 2026	LBC
SD22	Statement of Common Ground with HS2	October 2026	LBC
SD23	Statement of Common Ground with Historic England	October 2026	LBC
SD24	Lendlease and Euston landowners – Position statement	September 2026	LBC
SD25	EAP Regulation 22 Statement of Consultation	October 2026	LBC
SD26	Proposed Submission EAP (Regulation 19) Consultation Responses – Excel Spreadsheet	October 2026	LBC
SD27	Regulation 19 Consultation Responses Responder R01-R03	March 2026	LBC
SD28	Regulation 19 Consultation Responses Responder R04-R06	March 2026	LBC
SD29	Regulation 19 Consultation Responses Responder R07-R10	March 2026	LBC
SD30	Regulation 19 Consultation Responses Responder R11-R15	March 2026	LBC

Document Reference	Document	Date	Author
SD31	Regulation 19 Consultation Responses Responder R16-R20	March 2026	LBC
SD32	Regulation 19 Consultation Responses Responder R21-R26	March 2026	LBC
SD33	Regulation 19 Consultation Responses Responder R27-R35	March 2026	LBC
SD34	Regulation 19 Consultation Responses Responder R36-R45	March 2026	LBC
SD35	Regulation 19 Consultation Responses Responder R46-R55	March 2026	LBC
SD36	Regulation 19 Consultation Responses Responder R56-R61	March 2026	LBC
SD37	Regulation 19 Consultation Responses Responder R62-R66	March 2026	LBC
SD38	Consultation summary of Regulation 18 consultation in 2023	June 2024	LBC
SD39	Consultation summary of Supplementary Consultation in 2024	2025	LBC
SD40	Schedule of Proposed Main Modifications	In progress	LBC
SD41	Schedule of Proposed Additional Modifications	In progress	LBC

Topic Papers (TP)

Document Reference	Document	Date	Author
TP01	Heritage Topic Paper	In progress	LBC
TP02	Relationship with the Local Plan Topic Paper	In progress	LBC
TP03	Site Allocations Topic Paper	In progress	LBC
TP04	Open Space Topic Paper	In progress	LBC

Euston Evidence Base (EB)

Document Reference	Document	Date	Author
EB01	Euston Area Plan Background Report	January 2026	LBC
EB02	Euston draft Planning Brief	January 2020	LBC
EB03	Euston Transport Study	2025 Update version	TfL/LBC
EB04	Transport Study Addendum	2025 Update version	TfL/LBC
EB05	Managing Flood Risk in Euston – Sequential Test of the Site Allocations in the Euston Area Plan Update	December 2025	LBC
EB06	Euston Area Plan Viability Assessment	January 2026	31ten
EB07	Camden Local Plan Review Viability Study – Regulation 19 Update	April 2025	BNP Paribas Real Estate
EB08	Viability Study Appendix 1 CDM project services-built cost advice	April 2025	BNP Paribas Real Estate
EB09	Viability Study Appendix 2 Residential appraisal results base	April 2025	BNP Paribas Real Estate
EB10	Viability Study Appendix 3 Residential appraisal results growth scenarios	April 2025	BNP Paribas Real Estate
EB11	Viability Study Appendix 4 Build to rent appraisal results	April 2025	BNP Paribas Real
EB12	Viability Study Appendix 5 Student accommodation appraisal results	April 2025	BNP Paribas Real Estate
EB13A	Viability Study Appendix 6 Commercial schemes incorporating affordable workplace appraisal results - Part 1	April 2025	BNP Paribas Real Estate
EB13B	Viability Study Appendix 6 Commercial schemes incorporating affordable workplace appraisal results - Part 2		
EB14	Viability Study Appendix 7 Hotel appraisal results	April 2025	BNP Paribas Real Estate
EB15	Strategic Sites Viability Appraisal	April 2025	BNP Paribas Real Estate
EB16	Euston Economic Impact Assessment: Euston at the heart of Britain's new economy May 2024 The economic rationale for Euston's regeneration	May 2024	Metro Dynamics
EB17	Euston Social and Community Infrastructure Study: Establishing Demand	May 2026	Architecture 00/Aspinall Verdi/Pragmatix Advisory

Document Reference	Document	Date	Author
EB18	Community-led Heritage Assessment	October 2019	Richard Simpson, with Luisa Auletta, Alan Chandler, Slaney Devlin, Anthony Jennings, and John Myers
EB19	Euston Area Plan Historic Area Assessment	October 2014	Allies and Morrison and Urban Practitioners
EB20	Euston Land Use Mix and Delivery - Retail Planning Issues report	November 2022	Avison Young
EB21	Euston Area Sports Needs Assessment	January 2022	Knight, Kavanagh and Page
EB22A EB22B EB22C	Euston Open Space Study (part 1) Euston Open Space Study (part 2) Euston Open Space Study (part 3)	January 2023	LUC
Regulation 18 documents			
EB23	Reg 18 EAP Proposed Updates with tracks	2023	LBC
EB24	Draft initial EQIA of proposed updates to EAP	2023	LBC
EB25	Interim Sustainability Appraisal Report EAP proposed updates	2022	LBC
EB26	EAP Consultation Booklet July 24	July 2024	LBC
EB27	EQIA note EQIA note	June 2024	LBC
EB28	Sustainability Appraisal note	June 2024	LBC