

Position Statement in response to Euston Landowners comments on the Euston Area Plan Update

October 2026

1. Introduction

- 1.1 This document is intended to set out the current position in relation to comments raised on the Euston Area Plan (EAP) Update Proposed Submission Draft at the Regulation 19 consultation stage by Lendlease and the Euston Landowners.

Background

- 1.2 The EAP is being updated to ensure that the evidence base for parts of the plan are revised to reflect the most up to date information, constraints, opportunities and priorities for development within the Euston Area, including ensuring that the EAP is consistent with the updated Local Plan. Following informal consultation and engagement, proposed updates to the EAP were published for consultation January 2023. An additional consultation was held in Summer 2024. Regulation 19 consultation was held January - March 2026.
- 1.3 The Council is also in the process of updating the Local Plan. The Council published the Camden Local Plan Proposed Submission Draft for comment in May - June 2025. The draft 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 achieve this. The Camden Local Plan Proposed Submission Draft was submitted to the Secretary of State for independent examination on Friday 3 October 2025, with examination hearings now concluded following the last examination hearing session on 11 June 2026 and consultation on the proposed modifications to the plan due to be carried out in Autumn 2026.
- 1.4 Lendlease and the Euston landowners provided a response to the Euston Area Plan Update Proposed Submission Draft on 3 March 2026 and to the Local Plan on 27 June 2025 (with a subsequent response submitted on 13 March 2026 in relation to the Issues, matters and questions raised by the examiner).
- 1.5 As the Government's Master Development Partner, Lendlease and The Crown Estate's Joint Venture is leading the delivery of the Euston Station area Masterplan, the development around the station which will include new homes, shops, public spaces and workspaces. The principal landowners of the Euston Station Masterplan area are:
- **Network Rail** owns and operates the existing mainline Euston Station and much of the operational railway estate associated with the West Coast Main Line. The future Euston Campus proposals include redevelopment of the existing Network Rail station.
 - **Department for Transport (DfT)** holds significant interests in land acquired for the HS2 project and is leading the wider development programme through its Euston development arrangements.

Delivery at Euston - The Euston Station Masterplan area

- 1.6 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. A new governance structure has been created with the establishment of the Euston Delivery Company ('EDC') and there has, and continues to be, attendance by all delivery organisations along with Camden, TfL and GLA at a governance board where the EAP update has been discussed at key moments in the update process. The attendance of Network Rail, HS2 Ltd., TfL and the Department for Transport (DfT) at various governance and officer boards has also allowed regular input from strategic transport providers, Lendlease and the Euston landowners.
- 1.7 The EAP Update has been developed by the London Borough of Camden, with assistance from the GLA and TfL as key delivery and regulatory bodies, with involvement from Lendlease (Master Development Partner), HS2 Ltd and Network Rail during the preparation of the Plan, as well as regular meetings at officer level.

2. Summary of Representations made by Lendlease and the Euston Landowners (Regulation 19)

- 2.1 The representations to the EAP Update Regulation 19 consultation, submitted on 3 March 2026 on behalf of Lendlease and the Euston Landowners set out the following matters:
- The relationship between the EAP Update and the emerging Local Plan, specifically regarding the position on development viability, affordable housing and affordable workspace and associated evidence base; and
 - The proposed approach to HS2 replacement open space, as documented in the representations submitted by HS2. Ltd.
- 2.3 Please note that that the proposed approach to HS2 replacement open space is not covered by this position statement, and is a matter being separately discussed between HS2 Ltd. and the London Borough of Camden.

3. Current position based on available information

- 3.1 At the time of writing, there are still no confirmed Euston station designs or costs. There is a commitment to joint working by the delivery organisations to try to achieve the best integrated campus solution for Euston across the whole Euston Station campus. As the designs for the stations progress, further detailed work to understand technical and cost implications of development associated transport infrastructure will be required to fully test the viability of over and adjacent development in this area. The EAP Update has been developed to be flexible, reflecting the uncertainty around the station designs and the capacity to enable development over station infrastructure, including in the Cutting.

- 3.2 In response to the comments raised by Lendlease and the Euston Landowners, and following further discussions, proposed modifications¹ to the EAP Update are set out in Appendix A². The proposed modifications to Chapter 5, 'Delivery, Phasing, Planning Benefits and Monitoring', provide further references to the particularly challenging viability position in the Lendlease masterplan area / station sites noting that flexibility in the application of planning policy may be needed. More detailed commentary on the viability position is set out in section 5 of the 'Relationship between Euston Area Plan Update and Camden Local Plan' topic paper which is being produced to support the EAP Update through examination.
- 3.3 Given the stage in the design process, the uncertainty with cost and programme and the wider geography and timescale of the EAP Update (to 2051), it is the Council's position that the Local Plan and London Plan policies which it references in relation to affordable housing and workspace include sufficient flexibility to allow for variances in viability at the planning application stage.
- 3.4 Lendlease and the Euston Landowners have confirmed that the modifications proposed to the Euston Area Plan Proposed Submission draft in response to their representations are welcomed and supported.

¹ These modifications fall within the scope of para.1.5 of the PINS Guidance and are not being submitted as part of the Submission Plan for examination. They are modifications which have been negotiated to narrow issues and which the Council is content to make subject to the Inspector concluding that they are necessary for soundness and should form Main Modifications to be consulted on in due course.

² The proposed modifications agreed in response to the Local Plan were submitted to the Inspector as an Addendum to the Euston Topic Paper – these are set out in appendix B as they help to set the context for the EAP Update and proposed modifications to the EAP Update.

Appendix A – proposed modifications to the Euston Area Plan proposed submission draft

The proposed modifications are set out below (suggested additions in **bold**, deletions as ~~strike through~~).

These modifications fall within the scope of para.1.5 of the PINS Guidance and are not being submitted as part of the Submission Plan for examination. They are modifications which have been negotiated to narrow issues and which the Council is content to make subject to the Inspector concluding that they are necessary for soundness and should form Main Modifications to be consulted on in due course.

Policy	Paragraph or Figure	Change	Reason
5. Delivery, Planning Benefits and Monitoring	5.1 Delivery and Viability, pg. 230, paragraph 3	...Transaction and purchase values are high and the number of permitted and completed schemes is an indicator of viability in this location under a variety of circumstances, although the circumstances of the Euston Stations Masterplan area are unique.	Clarity
5. Delivery, Planning Benefits and Monitoring	5.1 Delivery and Viability, pg. 230, paragraph 4	Specifically in relation to the Euston station masterplan sites, the viability assessment indicates a challenging viability position and notes the difficulty in accurately establishing enabling costs until further design work is carried out and contracts are let. It recognises that there is the opportunity for viability to change over time and that there could be the opportunity for additional funding streams to come online over the timescales envisaged.	Clarity
5. Delivery, Planning Benefits and Monitoring	5.1 Delivery and Viability, pg. 230, paragraph 5	It is expected that viability, and therefore affordable housing delivery, affordable workspace and other contributions towards public benefits, will be reviewed at key milestones / as each phase of the Euston Masterplan is progressed given the long-term nature and phasing of the scheme over the railway/ stations.	Clarity
5. Delivery, Planning Benefits and Monitoring	5.1 Delivery and Viability, pg. 230	Move 3 rd paragraph on page to top of page (The high-level viability assessment has been completed in line with Government guidance on viability and Plan making, assessing the impact of the policies in the Plan)	Ease of reading

5. Delivery, Planning Benefits and Monitoring	5.6 Flexibility, Pg.233	The implementation and delivery of Euston Station Masterplan area Development of development in the Euston area should be coordinated across all stakeholders and ownerships throughout all stages of development, from pre-application to operation. It will be important to ensure that each phase of development is contributing to: • Delivering red as a socially and environmentally sustainable inclusive mixed-use place with its required supporting infrastructure, contributing to amenity & open space, sustainability, design quality and public benefit requirements set out in the preceding chapters. We will expect a balance of housing (including affordable housing), supporting facilities and jobs to be delivered throughout the phases across the Euston area and the life of the project. • constructed efficiently and with as little impact on local amenity as possible, through close working with the landowners to ensure early release of relevant plots and to ensure construction compounds are located where they will have least impact on local amenity and freedom of movement, and with other developers in the area to help reduce the cumulative impact of construction. This Area Plan will run until 2051. For phasing purposes this has been split into the following three indicative periods, which are referred to in the delivery strategies for each area in Part 4 and in the delivery plans summary table (Appendix 2)...	Clarity
5. Delivery, Planning Benefits and Monitoring	5.6 Flexibility, Pg.235	Euston is a unique and strategic project, including the delivery of nationally important transport infrastructure. As indicated by the viability assessment, it is challenging and complex to deliver. Flexibility of implementation, consideration of wider costs associated with delivery of constrained sites, and adapting to economic and market circumstances, will be vital in the delivery of this Plan.	Clarity
5. Delivery, Planning Benefits and Monitoring	5.6 Flexibility, Pg.235	ThisThe range of floorspace included in the EAP is considered to be appropriate representing the capacity capable of being supported in the Euston area – able to meet both wider planning requirements and the Plan policies and objectives. Should new opportunities for development be identified through design refinement it may be possible to deliver in excess of the ranges identified. It is recognised that with the significant and unusual	Clarity

		costs involved in development connected to the station and above tracks, development viability will be a considerable challenge. In considering proposals for redeveloping the station and tracks area in particular, the priority will be to ensure a development of high quality and excellently designed masterplan alongside any new station(s), and if additional development or taller buildings are necessary to facilitate this, some flexibility towards other requirements in this plan may be considered with reference to London and Local Plan policy, in order to ensure that development is deliverable and public benefits are maximised optimised .	
5. Delivery, Planning Benefits and Monitoring	Community Infrastructure Levy (CIL), pg. 237	CIL is a standard charge placed on development that will be spent on the infrastructure needed to support growth. The definition of Infrastructure is currently defined as includes roads and other transport facilities, flood defences, schools and other educational facilities, medical facilities, sporting and recreational facilities and open spaces. In Camden, two levies are collected...	Clarity
5. Delivery, Planning Benefits and Monitoring	Infrastructure Payments, pg. 237	The Council is aware of the special circumstances which affect development at Euston and is supportive of the major redevelopment proposals. In certain circumstances, it is considered that an Infrastructure Payment could be collected in lieu of collecting CIL. This is only where it allows for strategic infrastructure to be delivered at Euston which is identified in the formally adopted planning framework. Any proposals to accept any payment along these lines will be assessed in accordance with the procedure set out in CIL Regulation 73A. the Council will consider the utilisation of payment in kind and infrastructure agreements in accordance with the CIL Regulations.	Clarity

Appendix B – proposed modifications to the Camden Local Plan submission draft

Policy	Paragraph	Proposed Modification	Reason for Modification
Policy S1 South Camden	1.11	Propose to insert the following text at the end of paragraph 1.11: Once adopted the new EAP will form part of the Council's Development Plan (replacing the existing EAP 2015) and will be used for decision making purposes.	For clarity. To reflect the comments made by Lendlease and the Euston Landowners in their response to the Inspector's Matters, Issues and Questions (ED26).
Policy S1 South Camden	Part C	Propose the following modification to Policy S1 Part C: The focus of development in the south of Camden will be at in the Euston area , where major development is planned, and the areas around King's Cross and Holborn, with limited development expected in the Tottenham Court Road Opportunity Area (as defined in the 2021 London Plan), as development there is largely complete.	For clarity and consistency. To reflect the comments made by Lendlease and the Euston Landowners in their response to the Inspector's Matters, Issues and Questions (ED26).

Policy S1 South Camden	Part D	Propose the following modification to Policy S1 Part D – Development at in the Euston area will be guided by the policy framework set out in the Euston Area Plan and the Local Plan, and is expected to deliver between 1,500 and 2,500 new homes. These are likely to come forward towards the end of the Local Plan period.	For clarity and consistency. To reflect the comments made by Lendlease and the Euston Landowners in their response to the Inspector's Matters, Issues and Questions (ED26).
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