

Hearing Statements

On behalf of Lendlease and Euston Landowners

Matters 3, 5, 10 and 11

13 March 2026

Introduction

1. We have previously submitted representations to the Regulation 18 and 19 versions of the Local Plan on behalf of Lendlease (the Master Development Partner for Euston), the Landowners (Department for Transport and Network Rail Infrastructure Ltd) and Delivery Partners including HS2 Ltd. We recently notified the Programme Officer that we intend to participate in the Examination on the matters in relation to:
 - Matter 3: Meeting Camden’s Housing Needs
 - Matter 4: Housing Land Supply
 - Matter 5: Delivering an Inclusive Economy
 - Matter 7: Design and Amenity, Tall Buildings and the Historic Environment
 - Matter 10: Site Allocations and Area Based Policies
 - Matter 11: Viability
2. We are aware that Hearing Statements must be submitted to the Programme Officer by 12 noon on 13 March 2026. However, in advance of potentially submitting further Hearing Statements (as maybe necessary), we consider it critical to write to comment on the Inspectors Matters, Issues & Questions (‘IMQ’) in respect of Policy S2: Euston Area, and the interaction between the Local Plan policies as they apply to the Euston Area more generally and the draft Euston Area Plan (‘EAP’) which is the subject of a separate public consultation process. The purpose of writing is to seek to aid the Inspector and the Council on the relationship between the draft Local Plan and EAP with the intention that changes can be considered and made in advance of the Local Plan Examination.
3. The recently published draft EAP defers in many respects to the general policies in the draft Local Plan. There is a risk that these general policies of the Local Plan will apply to the Euston Area, which is a concern to us because they have not been designed to reflect the unique challenges and status of Euston as a key scheme

that is of local, regional and national significance. Thus, as currently drafted, the way in which the Local Plan is currently being used to create a policy context for Euston means the Euston Area should be a Matter to be considered at Examination in its own right. That is the approach currently adopted in the 2015 EAP which deals with specific policies for the Euston Area.

4. The emerging EAP is not as advanced as the emerging Local Plan, with the EAP having just reached Regulation 19 stage. As the Euston Topic Paper explains, that is due to previous delays and uncertainty around HS2. Therefore, the EAP is not on the same timeline to adoption as the Local Plan and the policies and supporting text in the Local Plan need to reflect that position. The Local Plan will be adopted first and its policies need to reflect that relationship and work as a standalone development plan document.
5. In summary, because the Local Plan does not accurately reflect the relationship between the Local Plan and EAP, Lendlease and the Euston Landowners are concerned that as currently drafted there is the potential for ambiguity about what and how policies in the Local Plan apply to the Euston Area and also therefore an ambiguity as to the evidence base that supports those policies.
6. If agreement can be reached in relation to this interaction, to make the Local Plan sound, there would be no need to consider Euston as a standalone Matter because that can properly be left to the EAP Examination in due course. This can be achieved either by:
 - a) The Local Plan containing detailed and justified evidenced policies for the Euston Area (which this Local Plan is not designed to do); or
 - b) There being a sufficient framework of policies in the Local Plan allowing the detailed policies to come forward in the EAP when the EAP is further advanced.
7. Our strong preference would be (b) above which is what we believe the emerging Local Plan is seeking to achieve but requires amendment to set a sound policy framework. We set out further details of the changes below in response to the IMQ on Policy S2.
8. We believe strongly that it would be beneficial to the Examination for Lendlease and the Euston Landowners to work with LB Camden on the proposed modifications identified with a view to agreeing these prior to the Examination. We have already engaged and opened dialogue with LB Camden to resolve the matters identified in

this Statement and will continue to positively engage. We consider there is the potential for a Statement of Common Ground to be agreed with LB Camden on a proposed set of modifications prior to the Examination. As a fallback, the representations have been drafted to allow consideration at the Examination if this is required.

9. We set out below under the IMQ heading on Policy S2 our observations and how modifications may address our concerns. Our proposed modifications inevitably overlap other policies of the Local Plan, including Policies S1, D2, H2 and IE4 (Matters 3, 4, 5 and 7 respectively) and supporting text. We are proposing changes to these policies as outlined in Appendices 1, 2 and 3. We would welcome the opportunity to discuss this further with the Council to agree a set of modifications prior to the Examination. If an agreed position can be reached, then Lendlease and the Euston Landowners may not need to attend the Hearing Sessions but reserve the right to do so at this time.
10. This single submission should be treated as our individual submission to each of the Matters above as the cross-cutting issues we identify for Euston are relevant to all and accordingly, as we say above, we hope that we can avoid attendance but reserve the right to attend the Hearing Sessions on all the above Matters.

With reference to Policy S2: 5. What is the purpose of the policy and is the scope appropriate?

11. We note that the relationship between the Local Plan and the EAP is explained in the Euston Area Plan Topic Paper (October 2025) submitted as part of the Examination. The Topic Paper highlights some key points regarding the relationship between the emerging EAP and the emerging Local Plan (our emphasis is underlined):
 - Whilst the Local Plan and the Euston Area Plan have been prepared separately, each Plan is supported by its own evidence base.
 - The Local Plan includes a policy for the Euston Area (Policy S2), to provide an overarching policy context to support the Euston Area Plan.
 - Whilst the policies in the Local Plan will apply to development coming forward in the Euston Area, the Euston Area Plan provides a more detailed policy framework to guide development at Euston in relation to, inter alia, land uses, housing, economy and employment, design, tall buildings, and transport recognising delivery of a new station, developing above railway lines and the associated inter relationships bring with it extraordinary costs, complexities and uncertainties

which sit outside of the cumulative testing of viability and deliverability of policies of the borough wide Local Plan.

- The detail [for the Euston Area] will be provided through the policies in the updated Euston Area Plan.
- The Viability Assessment for the Local Plan tests the ability of developments across the borough (including within the Euston Area) to accommodate the policies in the draft Local Plan alongside prevailing rates of CIL but excludes from that testing railway sites within the Euston Area recognising that those are the sites characterised by extraordinary costs.
- Due to the extraordinary costs associated with the delivery of a new station at Euston and developing over a railway line, the viability assessment work for the EAP concentrates on the ‘Euston Station and Tracks’ area and the ‘Camden Cutting’ area (these are areas where development sites are affected by extraordinary costs associated with developing over railway infrastructure). The Local Plan viability work focuses on the assessment of the viability of the non-railway sites.

12. The Local Plan has various references to the relationship between the Local Plan and the EAP. Supporting paragraph 3.20 to Policy S2 states that:

“Development proposals at Euston will be expected to have regard to the Local Plan, the Euston Area Action Plan and the London Plan, in addition to other relevant documents, which together form the basis for decision making in the Euston area.”

13. Policy S1 refers to the EAP under Part 5 and states *“seek the provision of, and contributions to, the delivery of infrastructure to support new development and reflect local priorities and needs, in accordance with the infrastructure needs and priorities set out in the Euston Area Plan;”*

14. Other references in the Local Plan to the EAP and its relationship to the Local Plan include:

- Paragraph 1.9, page 5 *“The Camden Site Allocations Plan was adopted by the Council in 2013 and will be replaced by the new Local Plan and the updated Euston Area Plan once they are adopted. A policy replacement schedule is set out in Appendix 1.”*
- Paragraph 1.11, page 7 *“Euston Area Plan – this is a strategic plan to help shape future change in the area around Euston Station. It seeks to ensure that we can secure the best possible future for the residents and businesses of Euston and visitors to the area. It was prepared jointly by Camden Council, the Greater London Authority and Transport for London and was adopted by the Council in*

2015. The Council are updating the Euston Area Plan (EAP) to ensure it has an up-to-date policy framework to guide decisions at Euston. The new EAP sets strategic objectives and guidelines for development in the area, in addition to allocating sites for development to deliver new homes and jobs.”

- Paragraph 1.37, page 12 “No sites in the Euston area are allocated in this Plan as they will be identified through the update to the Euston Area Plan.”
- Paragraph 3.16, page 48 “To ensure the Council has an up-to-date policy framework to guide decisions at Euston, an updated Euston Area Plan has been produced. The new EAP sets strategic objectives and guidelines for development at Euston, in addition to allocating sites for development to deliver new homes and jobs.”
- Paragraph 3.17, page 48 “Policy S2 sets out the Council’s overarching approach to delivering development at Euston and should be read in conjunction with the EAP.”
- Paragraph 12.32, page 457 “The Euston Area Plan sets out the policy approach to tall buildings in the designated Euston area and identifies locations where tall buildings may be an appropriate form of development. Applications for tall buildings within the boundary of the Euston Area Plan should therefore also have regard to the Euston Area Plan.”
- Paragraph 12.37, page 457 “Further relevant guidance to the Council’s approach to tall buildings is set out in: • the Euston Area Plan and the Fitzrovia Area Action Plan; • conservation area appraisals and management strategies; and • the Camden Character Study.”

15. Policy S1 also refers to the Euston Area Plan as per below:

“B. Sites are allocated in the south of the borough through the Local Plan and the Euston Area Plan to deliver new homes over the Plan period to 2041. The Council will expect sites to be delivered in accordance with the site allocation policies set out below and in the Euston Area Plan.

D. Development at Euston 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.

I. New employment floorspace (including laboratory, or lab enabled, floorspace) will be delivered in the south area of the borough through site allocations in the Local Plan and Euston Area Plan, existing planning permissions and the development of other sites.”

16. In summary, our observations on the Local Plan and its explanation of the relationship to the emerging EAP is as follows:
- The Local Plan appears to have been drafted on the basis that the emerging EAP would be adopted at the same time, which will not now be the case.
 - There is consistent reference to the EAP throughout the Local Plan but it is unclear whether this is reference to the adopted or emerging EAP.
 - In relation to setting the heights of tall buildings (Policy D2) the Local Plan is scoping out the Euston Area and leaving this to the EAP and not identifying Euston as an area appropriate for tall buildings which we consider is an incorrect approach.
 - The evidence base for the Local Plan in relation to the Euston Area defers to the emerging EAP evidence base on matters in relation to viability (both relating to affordable housing and affordable workspace) and setting heights in the Euston Area.
 - Detailed policies and the site allocation for the Euston Area are to come through the emerging EAP.
 - Railway Sites (which include sites the LL Masterplan) are excluded from the viability evidence base of the Local Plan and dealt with in the evidence base to the emerging EAP.
17. Given the above, we consider that the Local Plan requires amendment to make it sound. There is ambiguity within the Local Plan as presently drafted and whilst the Topic Paper on Euston is helpful, the explanation of the relationship needs to be embedded in the Local Plan itself. Policies and supporting text in the Local Plan need clarity. We would recommend the following:
- I. Where there are references to the EAP in all policies (including Policies S1 and S2) and supporting text, it should be made clear that this is an emerging/future document which will be adopted post adoption of the Local Plan but will, following adoption, form part of the development plan.
 - II. In the associated Table 12 to Policy D2, the Euston Area should be listed as an area suitable for tall buildings and Figure 22 should be amended to add a map reference for the Euston Area. The supporting paragraph 12.32 should be amended to make reference to the Euston Area as an area appropriate for tall buildings as identified under Part B of Policy D2 but that the exact heights of tall buildings for the Euston Area will be set out in the Site Allocation in the future EAP. This will ensure there is conformity between the Local Plan and future EAP on the appropriateness of tall buildings in the Euston Area.

- III. We consider that supporting text in Paragraphs 1.11, 3.16, 3.17, 3.20, 12.32 and 12.37 require amendment to reflect the fact that the EAP will be coming forward in the future as part of the development plan to replace the 2015 EAP.
- IV. We consider the purpose of Policy S2 is to set a strategic policy framework within which a detailed site allocation will be brought forward in the future under the emerging EAP. To that end, we are generally supportive of Policy S2 but consider that further modifications are required to address the matters raised in 1. above but also to align with the EAP in relation to recognising the national importance of the Euston Area. Our proposed changes are set out in Appendix 1.
- V. The viability evidence base for the Local Plan does not deal with railway land sites and leaves the detailed policies to the emerging EAP; due to the extraordinary challenges faced in delivering these sites commercially and the consequential impact on the level of affordable housing and affordable workspace that can be delivered. Local Plan supporting text and policies in relation to affordable housing (H4) and affordable workspace (IE4) need to be amended to reference that position and provide flexibility on the levels of affordable housing and affordable workspace that will come forward under all sites in the EAP and not just the railway land and cutting sites. Our proposed wording is included in Appendix 2.
- VI. Part 2 of Policy S2 states that Euston will deliver between 1,500 and 2,500 additional homes and Part 3 states that in the Euston Area it will “*prioritise the creation and retention of suitable employment floorspace for research, learning and knowledge-based uses*”. Whilst both housing and employment can be delivered in the Euston Area, the Lendlease Masterplan will have a strong focus on the delivery of offices for the Knowledge Quarter to meet the objectives of the Local Plan and EAP given this is an area of national and strategic importance. Consequently, development proposed within the Lendlease Masterplan area will not meet the requirements of Policy H2 of the Local Plan to target 50% of additional floorspace to be self-contained residential, and doing so would not align with, and would undermine the strategic objectives of the Local Plan to deliver a Knowledge Quarter at Euston and would not be consistent with Policy SD5 which prioritises offices in the CAZ and with the objectives for the Euston Opportunity Area. Policy H2 of the Local Plan therefore needs to recognise the objectives of Policy S2 and the emerging EAP and the Euston Area should be specifically excluded from Policy H2 to reflect the unique circumstances and the strategic objectives to deliver a Knowledge Quarter of London and national importance. Our proposed wording is included in Appendix 3.

18. To assist the Inspector and LB Camden in understanding how the changes we are proposing reflect the changes requested at Regulation 19 stage, we have produced a table that provides a comparison for each policy in Appendix 4. Due to the evolution of the Local Plan, its relationship with the EAP and the progress on the Euston Masterplan by Lendlease and the Euston Landowners there are differences in the proposed changes to that are now being sought but we consider this is helpful to ensuring that the Local Plan is sound. As can be seen from our accompanying comment, the objective of the submissions has not changed, we have just been a little clearer that this relates to Euston so that it leaves the route clear for the EAP to come forward later to apply specific policy but at the same time it also sets a clear Local Plan policy position as to how Euston should be treated if for whatever reason the emerging EAP does not progress in a timely fashion.

19. We believe strongly that it would be beneficial to the Examination for Lendlease and the Euston Landowners to work with LB Camden on the proposed modifications identified above with a view to agreeing these prior to the Examination. We consider there is the potential for a Statement of Common Ground to be agreed with LB Camden on a proposed set of modifications prior to the Examination. We intend to reach out to LB Camden to discuss further shortly. As a fallback, the representations have been drafted to allow consideration at the Examination if this is required.

Appendix 1

(New text in **bold type** and deleted text shown ~~crossed through~~)

Policy S2: Euston Area

A. ~~To realise the vision and objectives set out~~ In the Euston Area Plan, the Council will:

1. seek to prioritise local need, ensuring that development contributes to reducing inequalities, improving health and increasing life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed;

Insert after 1.

“2. support the optimisation of development in the Euston Area, recognising that there are viability challenges associated with the delivery of nationally significant transport infrastructure and associated development projects;

3. expect development ~~at~~ **within the Euston Area** to deliver between **approximately** 1,500 and 2,500 additional homes in total, along with the provision of appropriate replacement homes;

4. expect development to deliver new and replacement employment floorspace across the Euston Area, **to facilitate global competitiveness** and support and prioritise the creation and retention of suitable employment floorspace for research, learning and knowledge-based uses;

5. expect development to deliver new and replacement retail and leisure floorspace, to contribute to the creation of vibrant streets and reinforce the role of existing centres;

6. seek the provision of, and contributions to, the delivery of infrastructure to support new development and reflect local priorities and needs;

7. expect development to create a network of new and improved open spaces to replace lost open spaces and meet the needs of new development;

8. expect the re-development of Euston Station and associated development to be of excellent design, providing a world class, integrated station and transport interchange and a welcoming environment to residents and station users;

9. seek to improve connectivity both within the Euston Area, and to the wider area, including north towards Camden Town and south to Bloomsbury and the River Thames,

reducing the barrier effect of the Euston Road and encouraging sustainable and active travel;

10. expect the development to be taken forward in a coordinated and phased way, recognising the importance of successful and thoughtful meanwhile uses, to energise spaces, deliver social and economic benefits, and open up opportunities to new ventures; and

11. expect development to integrate high environmental standards, planting, biodiversity and green infrastructure, supporting a circular economy and contributing to improvements in air quality.

Appendix 2

(New text in **bold type**)

Policy H4

Add new point after 11 at Part B of Policy H4.

“12. In recognition of the specific delivery and viability challenges of development in the Euston Area, an appropriate level of affordable housing will be expected for development in the Euston Area, rather than apply the strategic target of 50%.”

Policy IE4

“The Council will require schemes to contribute towards a mixed and diverse economy that allows a variety of business types and sizes to access premises suitable for meeting their needs, particularly during the start-up phase. The Council will:

*2. seek a working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent for a minimum period of 15 years, **and in recognition of the specific delivery and viability challenges of development in the Euston Area, an appropriate level of affordable workspace will be expected for development in the Euston Area;**”*

Appendix 3

(New text in **bold type**)

Policy H2

Insert a new point 3 at Part B of Policy H2 and renumber successive numbered points (existing point 3 becomes point 4):

B. In the defined areas of high public transport accessibility (set out in paragraph 7.39), we will expect a contribution to permanent self-contained housing from all developments that provide additional non-residential floorspace and involve additional floorspace of 200 sqm (GIA) or more. The Council will seek to negotiate the contribution to permanent self-contained housing on the following basis:

1. a self-contained housing target of 50% is applied to all additional floorspace proposed (GIA);
2. the target is not applied to development in the defined Hatton Garden area provided that an equivalent contribution to jewellery workspace is provided in place of permanent self-contained housing;

Insert after 2. and re-number

“3. the target is not applied to development in the Euston Area recognising the unique national and strategic importance of the Euston Area as a driver for growth within the Knowledge Quarter to facilitate the global competitiveness of London;”

Appendix 4

(New text in **bold type** and deleted text shown ~~crossed through~~)

Comparison between Regulation 19 Representations and Hearing Comment Statement

Policy Reference	Regulation 19 Change	Hearing Statement Change	Comment
S2	<p><i>“To realise the vision and objectives set out in the Euston Area Plan, the Council will:</i></p> <p><i>1. Support the optimisation of development at Euston, recognising that there are tangible viability challenges associated with the delivery of nationally significant transport infrastructure and associated development projects”.</i></p> <p><i>“2. expect the development at Euston to be optimised, with the capacity for housing tested through discussions with the Council during the planning application</i></p>	<p>A. To realise the vision and objectives set out In the Euston Area Plan, the Council will:</p> <p>1. seek to prioritise local need, ensuring that development contributes to reducing inequalities, improving health and increasing life chances in local residential communities, creating opportunities for all and ensuring that investment delivers benefits where they are most needed; Insert after 1.</p> <p><i>“2. Support the optimisation of development at Euston, recognising that there are tangible viability challenges associated with the delivery of nationally significant transport infrastructure and</i></p>	<p>We have made a slight adjustment in the new para 2 (previously suggested as a new para 1) simply to clarify that “associated development projects” includes the commercially-led OSD and ASD and is not just associated infrastructure development.</p> <p>We have reverted to a lighter touch amendment on the housing figures. The housing numbers to come forward will be optimised and tested through the application, as set out at Regulation 19 stage, in balance with the employment floorspace,</p>

	<i>process and balanced with the delivery of employment floorspace; deliver between 1,500 and 2,500 additional homes in total, along with the provision of appropriate replacement homes;</i>	associated development projects, including “around station” and “over station” development projects;” 3. expect development at within the Euston Area to deliver between approximately 1,500 and 2,500 additional homes in total, along with the provision of appropriate replacement homes;	but we understand the need for there to be some form of indicative number.
D2	<i>“Locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan, are identified on Figure 22 and listed in Table 12. The exact appropriate building heights will be determined at planning application stage. Major station and public transport nodes are the locations best placed to achieve the greatest height and density. Guidance on building heights for specific sites is set out in relevant site allocation policies.”</i>	In the associated Table 12 to Policy D2, the Euston Area should be listed as an area suitable for tall buildings and Figure 22 should be amended to add a map reference for the Euston Area. The supporting paragraph 12.32 should be amended to make reference to the Euston Area as an area appropriate for tall buildings as identified under Part B of Policy D2 but that the exact heights of tall buildings for the Euston Area will be set out in the Site Allocation in the future EAP.	It remains the case that precise building heights will be determined at application stage when the appropriate level of scheme design has been achieved. However, we think it is important to be clearer about our overall objective, which is that tall buildings should be clearly identified a suitable in the Euston Area because it is the best way to achieve the densities necessary for a successful scheme and ensures conformity with London Plan Policy D9.
H4	12. In the case of public sector land, consideration will be given to a range of affordable housing products, including those which	Add new point after 11 at Part B of Policy H4. “12. In recognition of the specific delivery and viability challenges of	Again, the overall objective of the submission has not changed, which is to say that there must be a recognition of the unique circumstances at Euston, which

	<p>are bespoke to the development that is proposed;</p> <p><i>“E. In considering whether affordable housing provision should be made on-site, and the scale and nature of the provision that would be appropriate, the Council will also take into account:</i></p> <p>8. the economics and financial viability of development on public sector land where this involves extraordinary enabling costs;”</p>	<p>development in the Euston Area, an appropriate level of affordable housing will be expected for development in the Euston Area, rather than apply the strategic target of 50%.”</p>	<p>is that the scheme will need to take account of the very significant costs associated with the delivery of the railway station and infrastructure. Our proposed wording makes that clearer.</p>
IE4	<p><i>“The Council will require schemes to contribute towards a mixed and diverse economy that allows a variety of business types and sizes to access premises suitable for meeting their needs, particularly during the start-up phase. The Council will:</i></p> <p><i>2. seek a working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent for a minimum period of 15 years, subject to viability;</i></p>	<p><i>“The Council will require schemes to contribute towards a mixed and diverse economy that allows a variety of business types and sizes to access premises suitable for meeting their needs, particularly during the start-up phase. The Council will:</i></p> <p><i>2. seek a working benchmark of 20% of the net additional floorspace to be provided at 50% of the market rent for a minimum period of 15 years, and in recognition of the specific delivery and viability challenges of development in the Euston Area, an appropriate level of affordable</i></p>	<p>As with the above position, this makes the policy position clearer but with the same objective and effect in mind, which is to say that the viability circumstances at Euston will need special consideration.</p>

		<i>workspace will be expected for development in the Euston Area ;”</i>	
H2	<i>“A. Where non-residential development is proposed in any part of the borough, on individual sites rather than within development zones/plots within a large-scale masterplan, the Council will support the aims of Policy H1 by promoting the inclusion of permanent self-contained homes as part of a mix of uses.”</i>	<p>Insert a new point 3 at Part B of Policy H2 and renumber successive numbered points (existing point 3 becomes point 4):</p> <p>B. In the defined areas of high public transport accessibility (set out in paragraph 7.39), we will expect a contribution to permanent self-contained housing from all developments that provide additional non-residential floorspace and involve additional floorspace of 200 sqm (GIA) or more. The Council will seek to negotiate the contribution to permanent self-contained housing on the following basis:</p> <ol style="list-style-type: none"> 1. a self-contained housing target of 50% is applied to all additional floorspace proposed (GIA); 2. the target is not applied to development in the defined Hatton Garden area provided that an equivalent contribution to jewellery workspace is 	As with the above changes, we have sought to be clearer that this is about Euston.

		<p>provided in place of permanent self-contained housing;</p> <p><i>Insert after 2. and re-number</i></p> <p><i>“3. the target is not applied to development in the Euston Area recognising the unique national and strategic importance of the Euston Area as a driver for growth within the Knowledge Quarter;”</i></p>	
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