R16

Outlook

Fwd: Euston Area Plan Update -Proposed Submission Draft 2026 Representation Form

From Moon Chen <[redacted]
Date Fri 27/02/2026 18:28
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

1 attachment (7 MB)
Euston Area Plan Update -Proposed Submission Draft 2026 Representation Form.pdf;

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear all,

The attached is the form I have filled out. Please update us accordingly.

Thank you!

B/R

Ms Chen

[redacted]

R16

Euston Area Plan Update – Proposed Submission Draft 2026
Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Euston Regeneration Team at Camden Council by **midnight on 3 March 2026 by:**

E-mail: eustonareaplan@camden.gov.uk
Post to: Euston Regeneration Team, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts:
Part A – Personal Details (You need only submit **one** copy of Part A)
Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

---

	1. Personal Details*	**2.** Agent's Details (if applicable)
Title	MS	
First Name	XIAOYUE	
Last Name	CHEN	
Job Title (where relevant)	.	
Organisation (where relevant)		
Address Line 1*	[redacted]	
Address Line 2		
Post Town*		
Post Code*		
Telephone No.		
E-mail Address		

**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*

R16

Euston Area Plan Update – Proposed Submission Draft 2026 - Representation Form

Part B – Please use a separate page for each representation

Please see guidance note at the end of the form for assistance with completing sections 4 & 5

Name or Organisation:

3. Please give the number or name of the Paragraph or Policy your comment relates to or specify if your comment relates to the Policies Map.

Please use the links below to view the documents:

- Euston Area Plan Update Proposed Submission Draft (pdf)
- Policies map (pdf)

Paragraph	4.2	Policy	EA4 / EA5	Policies Map	EA4 / EA5

4. Do you believe the Euston Area Plan Update Proposed Submission Draft is:

1) Legally compliant	Yes		No	✓
2) Sound	Yes		No	✓
3) Complies with the Duty to co-	Yes		No	✓

If you have entered *No* to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Euston Area Plan Update is **unsound** because it is **NOT****:

1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	✓
2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate	✓
3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	✓
4) Consistent with national policy	✓

R16

Euston Area Plan Update – Proposed Submission Draft 2025 - Representation Form

6. Please give details of why you consider the Euston Area Plan Update Submission Draft **is** or **is not** legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Euston Area Plan Update Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

We do not agree with the Euston Area Plan Update 2026, including site allocations for Euston Square Hotel & 250 Euston Road.

Firstly. [redacted], we have never been noticed about the plan. It seems to us the plan didnot consider the local community or the historic neighbourhood. We believe once listed in a "site allocation" a subsequent planning application will not be refused.

2nd. Euston Square Hotel is a heritage, 250 Euston Rd is a high-quality building from 1970s which should be retained.

3rd: Demolition & rebuilding will bring a lot of pollutions & disruption to the whole community which we have suffered enough..

4th Tolmers Squar has been blocked from a lot of sunshine from different directions. Redevelopment with tall buildings will stop the sunshine from coming to the square, which will obviously affecting the health of the residents, the plants and the greenspace.

5th. the HS2 projects has been ongoing. Which we dont when is going to end, while we are still suffering the from the disruption from the project HS2, a more disruption coming into being will defenitely affecting us, the residents physically & mentally. especially the well being of the children & the older people.

6th. my children grew up in the area for more than 10 years. They will be affected mentally (Continue on a separate sheet if necessary) and physically greatly if the demolishment is going ahead.

R16

7. Please set out what modification(s) you consider necessary to make the Euston Area Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Euston Area Plan Update Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

We ~~do not believe~~ would to make sure the height of the buildings is restricted. The current buildings should be refit rather than demolished. And the height of the buildings should be preserved.

Also, the historical buildings and the cultural integrity of Tolmers Square and North Gower Street should be protected as much as possible.

(Continue on a separate sheet if necessary)

R16

Please note: *Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.*

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

☐ **No** ☑ **Yes**

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

We want our voice to be heard.

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.*

R16

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Euston Area Plan Update has been submitted
(b) when the Inspector's Report is published
(c) when the Euston Area Plan Update is adopted

Privacy Notice
We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Euston Area Plan Update documents, to the Secretary of State and must be made publicly available on the Council's website.

11. Signature:	[redacted]	**Date:**	27.02.2026

R17

Euston Area Plan Update – Proposed Submission Draft 2026
Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Euston Regeneration Team at Camden Council by **midnight on 3 March 2026 by:**

E-mail: eustonareaplan@camden.gov.uk
Post to: Euston Regeneration Team, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts:
Part A – Personal Details (You need only submit **one** copy of Part A)
Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*		**2.** Agent's Details (if applicable)
**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*		
Title	MR	
First Name	CHRIS	
Last Name	CLAZIE	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1*	[redacted]	
Address Line 2		
Post Town*		
Post Code*		
Telephone No.		
E-mail Address		

Euston Area Plan Update – Proposed Submission Draft 2026 - Representation Form

Part B – Please use a separate page for each representation

Please see guidance note at the end of the form for assistance with completing sections 4 & 5

Name or Organisation:

3. Please give the number or name of the Paragraph or Policy your comment relates to or specify if your comment relates to the Policies Map.

Please use the links below to view the documents:

- Euston Area Plan Update Proposed Submission Draft (pdf)
- Policies map (pdf)

Paragraph		Policy	EA4 / EA5	Policies Map	EA4 / EA5

4. Do you believe the Euston Area Plan Update Proposed Submission Draft is:

	Yes		No	
1) Legally compliant	Yes		No	✓
2) Sound	Yes		No	✓
3) Complies with the Duty to co-	Yes		No	✓

If you have entered *No* to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Euston Area Plan Update is **unsound** because it is **NOT****:

1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements) ✓
2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate ✓
3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities) ✓
4) Consistent with national policy ✓

R17

6. Please give details of why you consider the Euston Area Plan Update Submission Draft **is** or **is not** legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Euston Area Plan Update Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

I'VE LIVED IN SHELTERED HOUSING FOR ABOUT FIVE YEARS. I WAS NOT TOLD ABOUT PLANS TO KNOCK DOWN 250 EUSTON RD AND EUSTON SQUARE HOTEL BY POST OR ANY OTHER MEANS. IT IS VERY UPSETTING TO FIND OUT ABOUT SOMETHING SO SERIOUS WITHOUT THE COUNCIL BOTHERING TO LET US KNOW?

I STRONGLY OBJECT TO KNOCKING DOWN THESE BUILDINGS. PULLING THEM DOWN ~~AND~~ AND BUILDING TOWERS WILL MEAN YEARS OF NOISE, DUST AND DISRUPTION. FOR PEOPLE LIVING IN SHELTERED HOUSING, ESPECIALLY OLDER RESIDENTS, THIS WILL BE INCREDIBLY STRESSFUL AND UPSETTING. WHAT IS MEANT TO BE A CALM, SAFE SPACE TO LIVE, WILL TURN INTO A BUILDING SITE. FAMILIES AROUND TOLMERS SQUARE WILL BE AFFECTED AS WELL.

I'M REALLY WORRIED ABOUT WHAT THIS WILL DO TO OUR HEALTH. YEARS OF BUILDING WORK WILL AFFECT AIR QUALITY, AND PEOPLE'S WELL BEING, PARTICULARLY THE ELDERLY. THIS IS NOT SOMETHING WE SHOULD HAVE TO PUT UP WITH

250 EUSTON RD IS AN IMPORTANT PART OF THE HOSPITAL WHICH FUNCTIONS WELL. TOLMERS SQUARE IS ON OF THE FEW PEACEFUL AREAS LEFT AROUND HERE, IT DESERVES TO STAY THAT WAY.

PLEASE LISTEN TO THE PEOPLE WHO LIVE HERE. THIS IS ABOUT OUR HOMES, OUR HEALTH, AND OUR PEACE OF MIND.

(Continue on

R17

Please note: *Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.*

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

☑ **No** ☐ **Yes**

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invite to participate in hearings will lie with the independent planning inspector appointed by th Secretary of State.*

R17

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Euston Area Plan Update has been submitted
(b) when the Inspector's Report is published
(c) when the Euston Area Plan Update is adopted

Privacy Notice
We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Euston Area Plan Update documents, to the Secretary of State and must be made publicly available on the Council's website.

11. Signature:	[redacted]	**Date:**	2/3/26

R18

Euston Area Plan update 2026
Regulation 19 consultation

OBJECTION REGARDS SITE ALLOCATIONS EA4 AND EA5
03.03.26

We are writing to make a strong **objection to proposed site allocations EA4 and EA5**, which make implicit the demolition and rebuilding of two buildings, 250 Euston Road and Euston Square Hotel, for the following reasons:

1) It is not in accordance with Camden's Local Plan prioritisation of retrofit over demolition and rebuilding
2) Failure to consult properly
3) Environmental damage
4) Implications for the local community
5) Heritage impact
6) Impact on healthcare services

1) Camden Local Plan

Camden's proposed new Local Plan (currently under inspection by the Secretary of State) is intended to strengthen the prioritisation of retaining existing buildings to mitigate climate change. In the new policy **CC2 Prioritising the Retention of Existing Buildings**, it states:

> *8.12 Policy CC2 seeks to prioritise the retention of existing buildings over demolition, recognising the benefits of re-using materials in terms of:*
> *• limiting the carbon emissions associated with the extraction of raw materials;*
> *• reducing the impact associated with demolition and construction on the local community; and*
> *• speeding up the delivery of new homes and jobs, through reduced construction times.*
>
> ***Policy CC2***
> *Prioritising the retention of existing buildings*
>
> *A. The Council will expect developers to prioritise the retention and improvement of existing buildings over demolition.*

R18

In the Euston Road Area Plan Update however, these objectives have been ignored in favour of replacing existing office space with new. This is explicitly stated in the new Camden Local Plan in Policy S2 which covers the Euston Area.

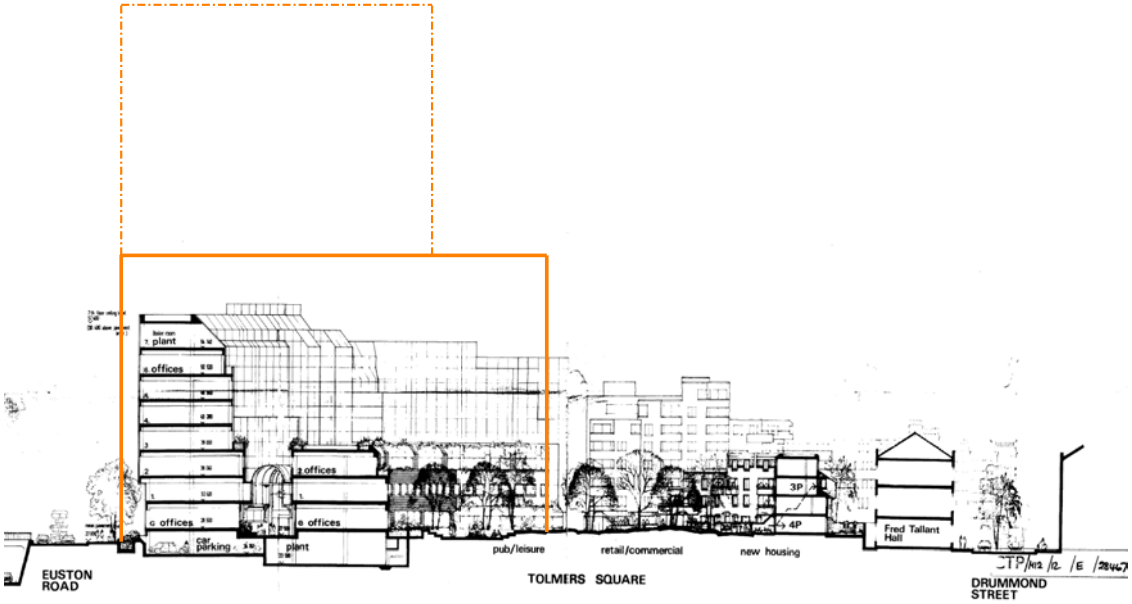
> ***Policy S2***
> *Euston Area*
>
> *To realise the vision and objectives set out in the Euston Area Plan, the Council will:*
>
> *3. expect development to deliver new and replacement employment floorspace across the Euston Area, and support and prioritise the creation and retention of suitable employment floorspace for research, learning and knowledge-based uses;*

It is clear from EAP Update Site Allocation 'EA4 Euston Circus Building' that the proposal is for the demolition and rebuilding of the existing building, as that is the only way in which the objectives stated in the site allocation can be achieved. An extract reads as follows:

Address	250 Euston Road, NW1 2PG	Area	6500m² / 0.65 hectares
Allocated Use	Mixed use (residential and commercial): Permanent self-contained homes; employment; retail	Indicative Housing Capacity	115 new homes
Description of Existing Site	Current health based / education office use		
Development and Design Principles	• The site should be redeveloped to provide new homes as well as to enhance workspace provision. LVMF constraints may allow for a tall building which is relatively slim in this location. Given the constrained floorplate of a tall building, residential use would be supported. • The development should provide active frontage and improve public realm on Euston Road and Hampstead Road, retain and		

The existing building has a very specific structure comprising three layers: an outer layer of office space, 8 storeys (32m) high, a glazed triple height atrium, and an inner layer of office space (incorporating the pub) that is 3 storeys (12m) high. It is suggested that a possible height of 40m may be suitable with a 75m residential tower. This is shown in the following image, which is an original drawing showing a 'section' cut through the existing building, with the 40m height outline shown in the solid orange line. The dashed line is the 75m residential tower behind.

R18



Above: section through existing office building, with 40m height indicative height guidance for redevelopment

Any pretence that the allocated use can be achieved by retrofitting the existing is misleading and not in accordance with the statements in the Development and Design Principles (see above), for the following reasons:

- ‘A tall building’ on the corner of Euston Road and North Gower Street will require demolition of the east end of the existing building. This will irretrievably damage the existing building and its operation.

- It is not possible to ‘enhance workspace provision’ (euphemism for enlarging) without changing the existing building configuration. It would require demolition of the atrium and three storey block as a minimum.

- Neither is it possible to provide retail and provide an active frontage without fundamentally changing the structure of the building, including the underground car park.

Policy S2 of the Camden Local Plan states clearly that ‘new and replacement’ floor space is the intention and this is reinforced by Site allocation EA4. This is therefore against the overarching principle of Policy CC2, which should take priority.

250 Euston Road (EA4), completed in 1981, is a high-quality late-20th-century building with architectural and historic merit. It is providing a valuable use (see Section 6) and should not be demolished.

Euston Square Hotel (EA5) is a recognised heritage asset contributing positively to the historic character of the area. Here demolition is clearly implied.

Both buildings are structurally sound, fit for purpose, and well suited to retrofit and refurbishment.

The Plan provides no transparent comparison between retrofit and demolition and no evidence demonstrating that demolition-led redevelopment represents the most sustainable or appropriate approach. This failure conflicts with adopted policies prioritising reuse and retrofit, particularly in the context of the climate emergency (see Section 3).

2) Failure to consult properly

LB Camden's consultation on the EAP Update is flawed. The Council has failed to engage with the local community in a transparent manner. Local people have not been properly informed. A summary of the consultation on EA4 and EA5 is as follows:

Regulation 18 consultation
There was a public consultation on the EAP Update running from **4th January 2023** for 6 weeks. Site allocations for 250 Euston Road and Euston Square Hotel were not included in the consultation of January 2023

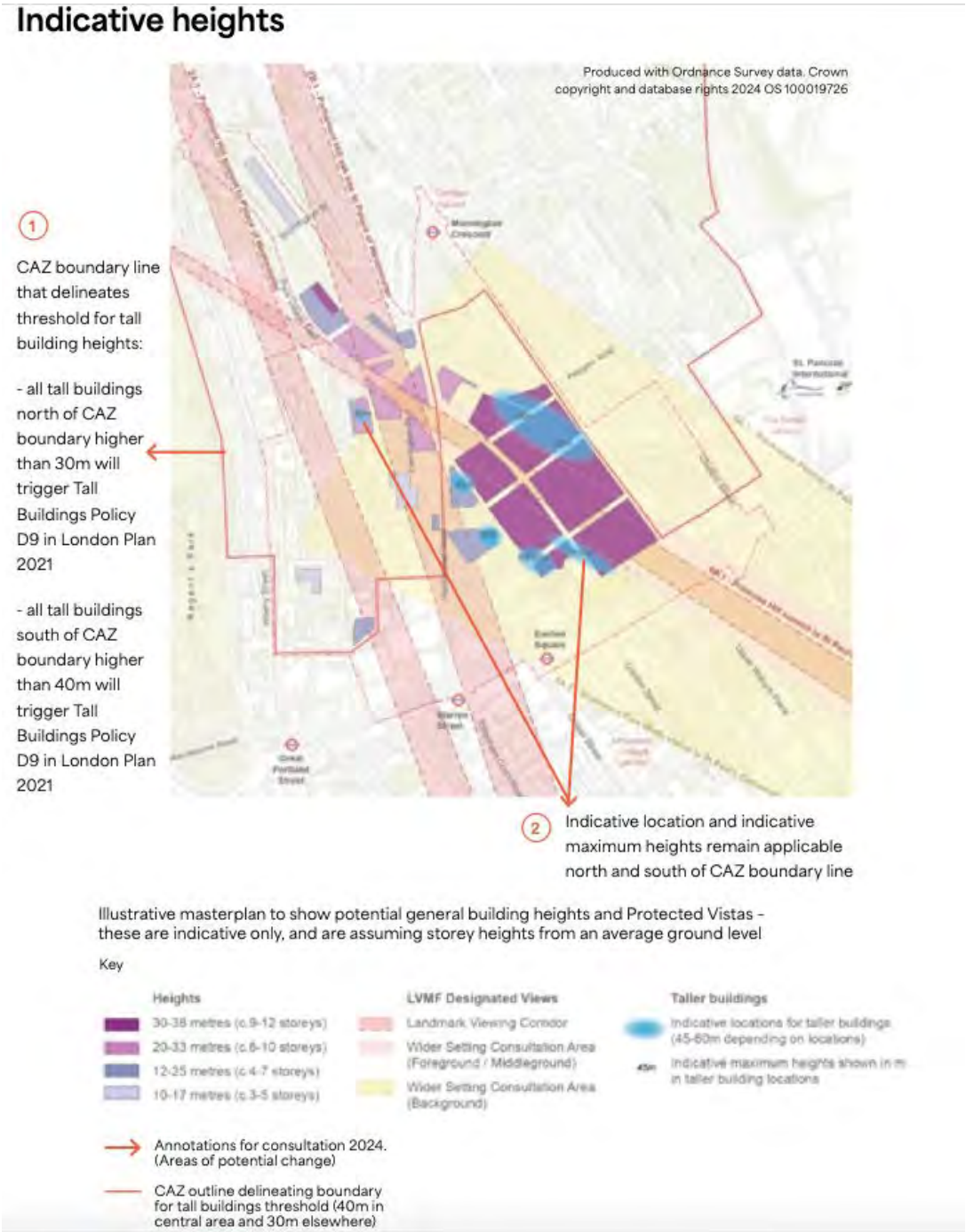
There was a further consultation in the summer of 2024, see report of **July 2024:** https://www.eustonareaplan.info/wp-content/uploads/2024/07/EAP-Consultation-Booklet-July-24-1.pdf

250 Euston Road
The site allocation for 250 Euston Road was included in the July 2024 consultation, but it did not include a 75m high residential tower or height up to 40m. It did not show the site boundary cutting across the public open space.

The site allocation in July 2024 was numbered (5) and was titled "Euston Circus Building' which is not the name of the building, and not one that local people would recognise.

Above: Site allocation Jul 2024

Site allocation (5) did not show up on the overall plan of site allocations which showed the height restrictions (see extract from the July 2024 consultation report below):



Above: extract from the July 2024 consultation, with no indication of height change at 250 Euston Road

R18

Above: Site allocation Jan 2026

It is confusing that in the 2026 Regulation 19 document the site allocation number changed from (5) to (EA4).

A site allocation was not included for the Euston Square Hotel in the July 2024 consultation. It was added after the public consultation ended. There was therefore no possibility for local residents to find about the proposal to demolish and rebuild the building before the EAP Update proposal was sent to the Inspector.

The Euston Area Plan Update fails to meet statutory and best-practice requirements for meaningful public consultation.

3) Environmental damage

Climate Emergency Camden opposes the unnecessary demolition and rebuilding of buildings that are fit for purpose on environmental grounds, for the following reasons:

Climate Change:
We urgently need to reduce Greenhouse Gas emissions. To have a reasonable chance of limiting global temperature increase to 2°C and avoiding catastrophic consequences for billions of people, radical reductions in global greenhouse gas (CO2e) emissions are necessary within this decade, according to the IPCC and other climate bodies.

We cannot go on demolishing and rebuilding existing buildings but should focus on improving the existing buildings we already have.

The proposed redevelopment of these two buildings will result in around 50,000- 60,000 tonnes CO2e being released into the atmosphere. This is estimated as follows:

250 EUSTON ROAD

Possible new build Gross Internal Area: 50,000m2
CO2e emissions from the demolition and construction of this new floorspace at rate of say 900kg/m2CO2e: **45,000 tonnes CO2e**

R18

EUSTON SQUARE HOTEL

Possible new build Gross Internal Area: 6,000m2
CO2e emissions from the demolition and construction of this new floorspace at rate of say 900kg/m2CO2e**: 5,400 tonnes CO2e**

The two site allocations would therefore cause at least **50,000 tonnes CO2e** to be released into the atmosphere. This is a significant harm that can be avoided by retaining the existing buildings.

Nature crisis:
The proposals will also cause unnecessary environmental damage around the world from extraction and manufacture of construction materials, making more likely the collapse of the global ecosystems on which we depend. The proposal does not recognise the necessity to live within planetary boundaries, a fundamental human need.

Local pollution:
In addition to the global environmental harms listed above, the demolition and rebuilding of these two sites would create noise, dust and air-pollution that would affect the lives of local residents and continue to disrupt local businesses.

4) Implications for the local community

Tolmers Square is green oasis, which provides a sheltered space for residents and the general public (it is a registered public open space).

Above: Google Maps view, looking west

R18

Above: Site plan (north upwards), showing site allocations EA4 250 Euston Road and EA5 Euston Square Hotel in pink.

The demolition and rebuilding of 250 Euston Road will cause harm to the environment of Tolmers Square due to the height, over-bearing nature of the development, over-shadowing and reduction in daylight and loss of privacy. In selecting this building for redevelopment, the planners have not given due regards to the health and well-being of residents.

The site allocations will cause further mental stress on residents who have already suffered years of demolition, uncertainty and delay due to the construction of HS2. These site allocations should be withdrawn to protect residents from further stress.

Nearby St. James Gardens, the only other public open space in the area, has recently been swept away by the construction of HS2. Tolmers Square must be protected from the impact of further redevelopment. The existing office steps down from 8 storeys facing Euston Road, to 3 storeys around the square, and provides a humane scale around the square. This would be lost in redevelopment.

Above: photo looking northwest across Tolmers Square with the 250 Euston Square office building on the left

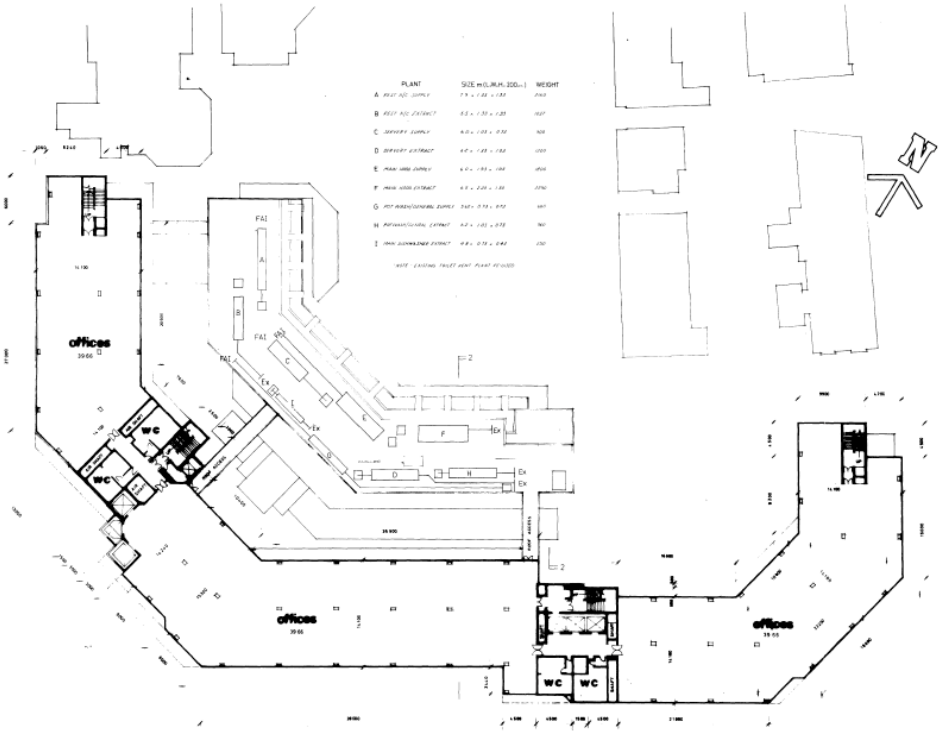
5) Heritage Impact

250 EUSTON ROAD
250 Euston Road was developed by Stuart Lipton, as his first venture with Greycoat. It was designed by architects Renton Howard Wood Levin in 1979 and was completed in 1981. Originally built for Prudential Insurance, it is now occupied by UCLH NHS Foundation Trust. It used high quality external walling, which steps around the corner of Euston Road in a bold and architecturally innovative manner. It provides a shield to the social housing to the north, protecting it from noise, pollution and wind. It was the first mirror clad office building in London. It was well built and has stood the test of time well.

Above: photo looking towards 250 Euston Road, at the junction of Hampstead Road and Euston Road

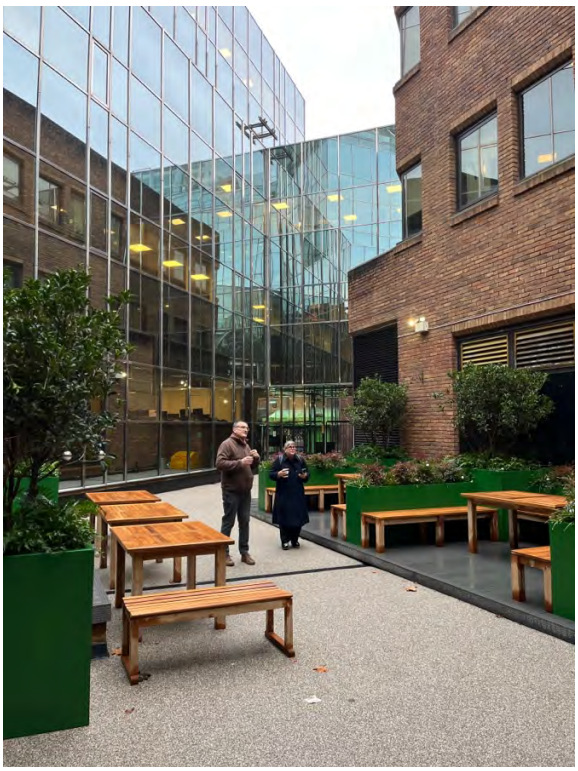
R18

The building has an interesting plan, incorporating a glazed atrium, an early example of an atrium-office building.



Above: plan of the upper floors of 250 Euston Road

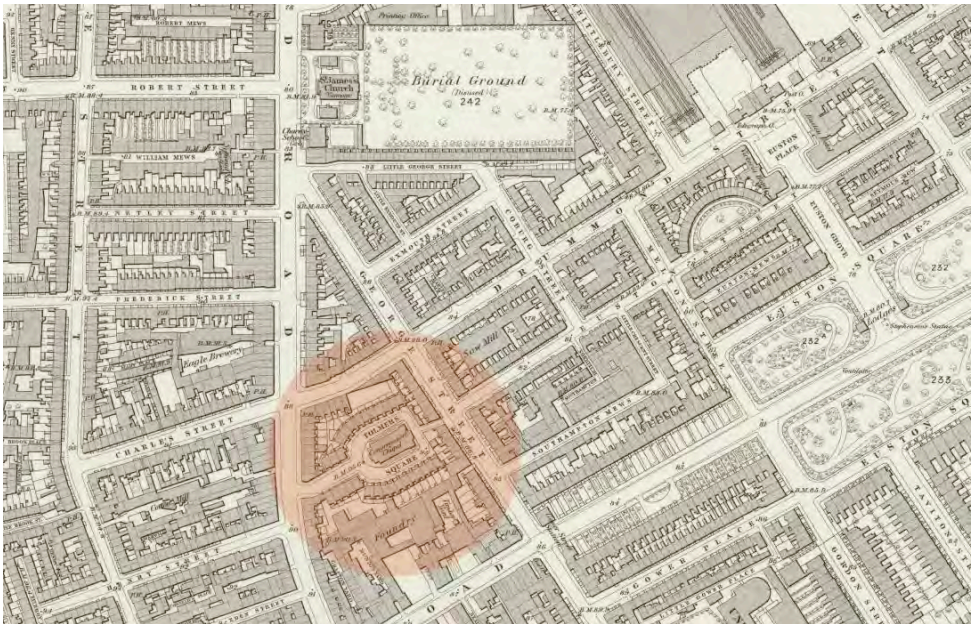
Internal materials include Travertine, marble and terrazzo. The atrium is paved with brick to read as part of the external space. Original fixtures and fittings survive throughout the building.



Above: layered space, internal atrium and external area

R18

250 Euston Road was part of the overall development of Tolmers Square, including the social housing to the north. The plan form echoed the original street pattern.



Above: 1882 OS map showing the original Tolmers Square

The development in the late 1970s followed decades of protest against commercial development in the area, to protect the local community and businesses. Please see following link with information about this, APPENDIX A: https://indd.adobe.com/view/9edf75a5-7f37-46d1-9daa-3a3e1ee32f35

EUSTON SQUARE HOTEL

The building is well used with a high quality internal fit-out in the main entrance area. It the only original Victorian building remaining on this part of Euston Road and has important heritage value. The site allocation indicates that the redevelopment would assist in providing an accessible entrance to the east-bound track of the underground at Euston Square station. However, the demise of the station sits outside the footprint of the hotel, and a lift could be provided without demolishing the hotel.

Above: Euston Square Hotel, looking down North Gower Street

6) Impact on healthcare services

The building is of strategic importance to UCL hospital on the opposite side of Euston Road, and the wider HNS estate. It is an affordable building and is used for of education and training. Much of the office space is used by medical secretaries, clinical leads and administrators that run all outpatient clinics as well as inpatient surgical teams. Clinical psychologists and therapists see outpatients here. Up to 1000 people use the building. Patients include local people, and those from around the country, who come here for specialist services.

The parking yard is very important for deliveries for the NHS; the underground carpark is the only parking space available for staff in the area, including midwives.

UCLH NHS Foundation Trust has leased the building for the past 20 years and holds a lease until 2039 (ie. for the next 13 years). It wants to continue to use the building and to invest in its refurbishment. It provides affordable office space that suits their requirements.

The proposed redevelopment would displace the existing healthcare use and harm the operation of the NHS in the local area, including the UCH Hospital. It will also reduce the support provided to younger healthcare workers.

Above: Parking and deliveries for 250 Euston Road

SUMMARY

For the above reasons we think that site allocations EA4 and EA5 should be removed entirely from the EAP Update 2026. If the owners of the buildings come forward with planning applications for the development of their buildings, they can be dealt with through the Development Control process.

It makes it more likely that planning policy will be upheld if the buildings are not included in the site allocations. Demolition and rebuilding schemes that are included in site allocations do not appear to get the same level of scrutiny as planning applications without them and tend to be approved more easily on the basis that they benefit from a previous site allocation.

FURTHER NOTE

One of the explanations that Camden Council gives for having added these two buildings as site allocations right at the end, or after, the Regulation 18 consultation period is that it is in response to the housing crisis. This does not appear to be a valid reason for the following reasons:

- In the case of 250 Euston Road, new homes would not be delivered until after the lease with UCHL Foundation Trust has expired, ie. approximately 15 years time. The tower would be expensive to build and not suitable for social homes. It is likely that it would be high-cost market homes, which will not reduce Camden's housing waiting list.

- In the case of Euston Square Hotel, the site footprint is too small to successfully combine a new hotel and a relatively small number of residential units.

END

R18

Outlook

Euston Area Plan Update 2026_consultation response

From CE Camden [redacted]
Date Tue 03/03/2026 13:06
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>
Cc Planning <Planning@camden.gov.uk>

1 attachment (4 MB)
CEC Objection_Euston Area Plan Update_03.03.26.pdf;

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Dear Sir/ Madam,

Please see attached our submission in respect of the EAP Update 2026 (Regulation 19) consultation.

We would be grateful if you could confirm receipt.

Yours sincerely,

Alice Brown
Climate Emergency Camden

Planning Consultants

R19

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

Registered No. 05092507

0207 004 1700

www.dp9.co.uk

TJH/DPNF
22nd February 2026

Camden Council
Euston Regeneration
5 Pancras Square
London
N1C 4AG

Dear Sir/Madam,

EUSTON AREA PLAN – PROPOSED SUBMISSION DRAFT (JANUARY 2026)

On behalf of our client, Derwent London Plc ('Derwent London'), we are pleased to provide the following comments on the proposed submission draft of the Euston Area Plan ('EAP').

Euston Circus Building (EA4)

As owner of the Euston Circus Building (250 Euston Road, NW1), Derwent London support the inclusion of the site as an allocation in the EAP for future mixed-use development. The allocation of the site recognises the potential it has to help contribute to the future employment and housing needs of the borough, including the potential for tall building development at the site.

The draft allocation identifies that any tall building on the site is expected to have a relatively slim floorplate which would lend itself well to residential development. Although Derwent London is yet to undertake their own assessment to determine what size floorplate building(s) could be achieved on the site, it is agreed that smaller floorplate buildings are typically more suited to residential development. However, this equally applies to other living-led uses, such as purpose-built student accommodation and large-scale purpose built shared living. For this reason, it is requested that the draft allocation is updated to identify the potential for these other forms of housing to also come forward at the site should there be sufficient demand for such accommodation at the relevant time.

The existing building at the site is occupied by UCLH NHS Foundation Trust and is currently used for a range of office; research and development and healthcare purposes. As the existing site comprises healthcare use, it is also requested that the draft allocation be updated to identify the potential for continued healthcare uses to form part of the mix of uses that could be appropriate as part of any future redevelopment. It is appreciated that such uses could potentially come forward as part of the reference to 'commercial' within the draft allocation, but for the purposes of clarity, it is requested that clearer wording be included.

To reflect the above and ensure the site allocation is positively prepared, appended to this representation is proposed amended wording that we request be reflected in the final EA4 allocation within the EAP.

We look forward to receiving acknowledgement of these representations and would be happy to discuss the content of our proposed amendments with officers should it be helpful. If you require any further information or clarification, then please contact Tim Holtham of this office.

Yours faithfully

[redacted]

DP9 Ltd.

EUSTON CIRCUS BUILDING (EA4)

SUGGESTED AMENDMENTS TO ALLOCATION WORDING

BOLD – New proposed wording to be added.
~~STRIKETHROUGH~~ – Existing wording to be deleted.

Allocated Use

Mixed use (residential and commercial): Permanent self-contained homes ***and/or other living uses including Purpose-Built Student Accommodation and/or Large Scale-Purpose Built Shared Living;*** *employment;* ***healthcare; and/or*** *retail.*

Development and Design Principles

- The site should be redeveloped to provide new homes**,** ~~as well as to~~ enhance workspace provision **and/or continue to provide healthcare uses**. LVMF constraints may allow for a tall building which is relatively slim in this location. Given the constrained floorplate of a tall building, residential use**, purpose-built student accommodation and/or large-scale purpose built shared living** would be supported.

R20

From: Eve Dineen[redacted]
Sent: Monday, February 9, 2026 14:11
[redacted]
Subject:

> You don't often get email f[redacted] Learn why this is important

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc.

Im writing to you as a [redacted] directly affected by the proposed demolition and redevelopment of 250 Euston Road and the associated plans impacting Tolmers Square and North Gower Street.

This proposal cannot be viewed in isolation. Our community has already endured years of disruption and environmental harm as a result of HS2 and surrounding major developments in the Euston area. Residents have experienced the loss of mature trees, reduction of green space, prolonged construction noise, air pollution, and significant impacts on wellbeing. Further large-scale demolition and high-rise development would add to this cumulative harm and place additional strain on an already overburdened community.

R20

Tolmers Square in particular has a well-documented and important place in Camden's social and planning history. In the 1970s and 1980s, the area became a symbol of successful community resistance to large-scale redevelopment that threatened to erase historic housing and community spaces. Residents, artists, and local campaigners fought to protect Tolmers Square, establishing it as a model of community-led regeneration. That history should be respected and protected, not repeated or undermined by further overdevelopment.

The proposed development raises serious concerns regarding loss of daylight and sunlight, overshadowing, overlooking and loss of privacy, increased wind impacts, and prolonged construction disturbance. These are material planning considerations that directly affect residents' health, quality of life, and the long-term liveability of our homes. Any development that results in significant harm to residential amenity should be resisted.

We are also deeply concerned that tenants and residents have not been given sufficient notice or meaningful opportunity to engage in this process. Genuine consultation must include the people most affected. Limited notice undermines trust and prevents residents from properly understanding, responding to, and contributing to proposals that will fundamentally affect their homes and daily lives.

Furthermore, the demolition of a large existing building directly contradicts Camden Council's declared climate emergency commitments. Demolition and new construction generate substantial embodied carbon emissions, construction waste, and pollution. In the context of the climate crisis, retrofit, reuse, and lower-impact alternatives should be prioritised over demolition wherever possible.

The Euston area is already subject to intense development pressure, including HS2 works and multiple large commercial and residential schemes. The cumulative impact of these projects must be properly considered. Regeneration should enhance communities, not overwhelm them or erode the very qualities that make them liveable.

We therefore urge Camden Council and all relevant stakeholders to reconsider any proposals that would result in further loss of daylight, green space, privacy, and residential amenity, and to engage in meaningful, transparent consultation with tenants and residents. Regeneration must work with communities — not be imposed upon them.

Our homes, our health, and our community matter. We ask that the historic, environmental, and human impacts of this proposal be given full and serious weight in the decision-making process.

Yours faithfully,

Eve Dineen
[redacted]

R20

Euston Area Plan Update – Proposed Submission Draft 2026
Representation Form

The best way for you to make representations is by using this form. Representations should be returned to the Euston Regeneration Team at Camden Council by **midnight on 3 March 2026 by:**

E-mail: eustonareaplan@camden.gov.uk
Post to: Euston Regeneration Team, Camden Town Hall, Judd Street, London, WC1H 8EQ.

This form has two parts:
Part A – Personal Details (You need only submit **one** copy of Part A)
Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*		**2.** Agent's Details (if applicable)
**If an agent is appointed, please complete only the Title, Name, Organisation and asterisked boxes in column 1 but complete the full contact details of the agent in column 2.*		
Title	MISS	
First Name	EVE	
Last Name	DINEEN	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1*	[redacted]	
Address Line 2		
Post Town*	[redacted]	
Post Code*		
Telephone No.		
E-mail Address		

R20

Euston Area Plan Update – Proposed Submission Draft 2026 - Representation

Part B – Please use a separate page for each representation

Please see guidance note at the end of the form for assistance with completing sections 4 & 5

Name or Organisation:

3. Please give the number or name of the Paragraph or Policy your comment relates to or specify if your comment relates to the Policies Map.

Please use the links below to view the documents:

- Euston Area Plan Update Proposed Submission Draft (pdf)
- Policies map (pdf)

Paragraph 4.2 Policy EA4 - EA5 Policies Map EA4-EA5

4. Do you believe the Euston Area Plan Update Proposed Submission Draft is:

1) Legally compliant	Yes		No	✓
2) Sound	Yes		No	✓
3) Complies with the Duty to co-	Yes		No	✓

If you have entered *No* to 4.(2), continue with Q5, otherwise please go straight to Q6

5. Do you consider the Euston Area Plan Update is **unsound** because it is **NOT****:

1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	✓
2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate	✓
3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	✓
4) Consistent with national policy	✓

R20

6. Please give details of why you consider the Euston Area Plan Update Submission Draft **is** or **is not** legally compliant, unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to **support** the legal compliance or soundness of the Euston Area Plan Update Proposed Submission Draft or its compliance with the duty to cooperate, please use this box to set out your comments.

Our beautiful Square has just been redone and we do not need another disturbance, this will cause disruption and will mean us living on a building site.
This proposal will cause pollution, block our sunlight.
The traffic on Euston Rd causes pollution but we are currently protected by the building which is what they want to bring down which will cause loads more disruption to our beautiful Square.
The noise will be unbearable.

(Continue on a separate sheet if necessary)

R20

7. Please set out what modification(s) you consider necessary to make the Euston Area Plan Proposed Submission Draft legally compliant or sound. Please have regard to any answer you have given at 5 and 6 above.

You will need to say why this modification will make the Euston Area Plan Update Proposed Submission Draft legally compliant or sound. It will be helpful if you are able to suggest revised wording. Please be as precise as possible.

Proposed Modifications Required to make the plan Sound and legally Compliant.

Stronger protection for residential Amenity

The plan should include explicit wording that development must not result in unacceptable loss of daylight, sunlight, privacy or cause excessive overshadowing to existing Residential properties

All proposals must assess Cumulative environmental and residential impacts in Combination with existing developments in the Euston Area

Demolition of existing buildings will only be supported where it Can be clearly demonstrated and show clear environmental benefit

Building heights must respond Sensitively to Surrounding Context and loss of amenity

(Continue on a separate sheet if necessary)

R20

Please note: *Your representation should cover succinctly all the information, evidence and supporting information necessary to support and justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations.*

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification to the Plan, do you consider it necessary to participate at the oral part of the examination (the examination hearings)?

☑ **No** ☐ **Yes**

9. If you wish to participate at the oral part of the examination, the examination hearings, please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. The final decision on who is invited to participate in hearings will lie with the independent planning inspector appointed by the Secretary of State.*

R20

10. Do you wish to be added to our consultation database to be notified of any of the following? Please mark all that apply.

(a) when the Euston Area Plan Update has been submitted
(b) when the Inspector's Report is published
(c) when the Euston Area Plan Update is adopted

Privacy Notice
We will only process personal data where we have consent to do so, and you can withdraw your consent at any time. By submitting your personal data in the response form you are consenting for us to process your data and/or consenting to be added to the database. If added to the database, they can be removed upon request.

Please note that comments submitted to the Council cannot be treated as confidential. All submissions will be required to be made public along with the name of the person making the submission and organisation (if applicable). All other personal information will be kept confidential. Copies of all comments received will be submitted, alongside the Euston Area Plan Update documents, to the Secretary of State and must be made publicly available on the Council's website.

11. Signature:	[redacted]	**Date:**	25/2/26