R27

Outlook

Consultation on Euston Area Plan – Regulation 19

From GLA-Planning Support [redacted]
Date Wed 04/03/2026 14:12
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com> [redacted]
Cc Planning Support <[redacted]

1 attachment (230 KB)
Euston Area Plan (Regulation 19) - GLA Response 03.03.2026.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.

Good afternoon Mary-Ann,

Please see attached the GLA Consultation on Euston Area Plan – Regulation 19.

Kind regards,

Teeray Grant
Planning Data and Performance Officer
GREATER**LONDON**AUTHORITY
[redacted]

From: Karen Montgomerie [redacted]
Sent: Tuesday, March 3, 2026 7:00 PM
To: GLA-Planning Support <[redacted]
Subject: Local Plan Response for Website

Hello,

Please could you upload the attached to the website and circulate to relevant people.

Thanks! Karen

Karen Montgomerie
Team Leader (Local Plans), London Plan and Strategic Planning
Greater**London**Authority
[redacted]

www.london.gov.uk/what-we-do/planning
[redacted]

R27

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R27

GREATERLONDONAUTHORITY

Mary-Ann Lewis
[redacted]

By email: [redacted]

Department: Planning
Our reference: [redacted]
Date: 3 March 2026

Dear Mary-Ann,

Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012

RE: Consultation on Euston Area Plan – Regulation 19

Thank you for consulting the Mayor of London on the draft Euston Area Plan (EAP) Regulation 19 document. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and are attached at Annex 1.

The Mayor provided comments on the Euston Area Plan Regulation 18 consultation on 10 March 2023 (Ref: LDF06/LDD22/LP04/MP01). This letter follows on from that earlier advice and should be read alongside the Mayor's previous response.

General

The draft EAP sets out a compelling vision for the future of Euston and the Mayor welcomes the positive and ambitious approach being taken by the London Borough Camden in the EAP. The scale and ambition of the Euston station redevelopment make it a nationally significant project, offering substantial growth opportunities for both London and the wider UK. There is a major commercial opportunity to deliver high quality development on the station site itself—focused on key growth sectors—with additional potential in the surrounding area. The site is uniquely positioned at the centre of the Knowledge Quarter, one of Europe's leading innovation districts.

The GLA and the London Borough of Camden have a shared vision for the future of Euston and are working in partnership on the establishment of a new development corporation to coordinate and oversee the regeneration of the area. GLA officers have met with LB Camden officers regularly during development of the draft EAP and we are pleased to note that these discussions have positively informed the Regulation 19 plan. As currently drafted it is the Mayor's opinion that the Regulation 19 Euston Area Plan is in general conformity with the London Plan.

It is noted that Camden's draft new Local Plan was submitted to the Secretary of State for examination in October 2025, and this includes a policy for the Euston Area to provide the overarching policy context to support the EAP.

Vision and objectives

The Vision for the Euston area in 2051 is to be both a local hub of activity and gateway to London through high quality comprehensive and transformational development above and around a high quality transport interchange. The redevelopment of Euston Station is stated as being central to the vision and objectives of the EAP, with comprehensive redevelopment of the station highlighted as best helping to achieve this vision and the plan objectives. The vision also promotes enhancement of Euston's role as a medical research, knowledge, innovation and creative industries base centred around the cluster of world class education and research institutions in the area. Overall, the vision aligns with the vision for Euston set out in LP2021 Policy SD1 and is supported by the Mayor.

The draft EAP retains the nine objectives included in the Regulation 18 version of the plan, with minor updates. The Mayor welcomes the specific reference to affordable housing that has been added to Objective 1 (Prioritising local people's needs).

Development Strategy

The development strategy sets out the overarching planning framework for the Euston area including the spatial concept, land use strategy, design strategy, transport strategy, environment strategy, and open space strategy.

Within the **land use strategy** section, Strategic Principle EAP1 Part A Overall Mix has been updated to reflect that as designs for the station develop, development above and adjacent to the station should explore opportunities for additional floorspace where this meet wider policies in the EAP, Camden's Local Plan, and the London Plan. These updates remove the reference to exceeding targets (noted as a concern at Regulation 18) and provide helpful clarity about priority land uses should new areas for development be identified through design refinement of the station.

Part B Homes of EAP1 sets out that developments in the Euston area are expected to deliver around 2,000 additional homes, and that optimising the potential of sites to deliver a greater number of homes will be supported. The further refinement of expected housing figures since the Regulation 18 consultation and the reference to optimising the potential of sites to deliver additional homes is welcomed. Appropriate references are also now made to London Plan policy in relation to affordable housing, including in the supporting text in relation to preferred affordable housing tenure, noting that the Mayor has previously indicated support for the proposed approach to affordable housing set out in Camden's draft new Local Plan.

Part C Economy and Employment of EAP 1 sets out that between 215,00sqm and 370,000sqm of employment floorspace (providing between 10,000 and 17,300 additional jobs) are expected to be delivered in the Euston area. The further refinement of the expected employment floorspace/jobs figures since the Regulation 18 consultation is welcomed. The associated new supporting text provides helpful clarification as to why the identified employment floorspace capacity/jobs range is higher than the indicative capacity included in the LP2021 for Euston.

The supporting text to Part D Retail, Leisure and Culture has been updated to include specific reference to consideration of cultural facilities and supporting the objectives of Camden's

Evening and Night Time Strategy. This explicit recognition of the potential role for Euston at night is welcomed.

Within the **design strategy** section, tall buildings are considered under Parts D and E of Strategic Principle EAP2 Design, with locations appropriate for tall buildings indicated in Figure 3.4. Some updates have been made to the wording of Parts D and E to clarify how tall buildings should be designed and make appropriate reference to the draft new Local Plan's definition of tall buildings. These updates provide clarification and Policy EAP2 satisfies the requirements of LP2021 Tall Buildings Policy D9.

Strategic Principle EAP2 has been updated to make specific reference to the need for proposals to take account LVMF policy is relation to the designation Protected Vistas that cross the areas, and the additional supporting text in relation the Protected Vistas identified in the London View Management Framework (LVMF) that constrain the EAP site is noted. This reflects our comments at Regulation 18 that all protected views should be referenced in the EAP, regardless of whether there are sites identified as appropriate for tall buildings within the viewing corridor.

Additional wording has also been added to clarify that Figure 3.4 and the associated supporting paragraphs provide guidance on locations that may be suitable for tall buildings based on initial testing only. The paragraph goes on the state that precise locations and heights will be the subject of a full and proper testing process including an assessment of impact in line with London Plan policy. It is also stated that careful siting, massing, and detailed design informed by site specific analysis may demonstrate that different heights in some locations could achieve compliance with London Plan and LVMF policy. These clarifications are welcomed.

Local authority policy documents should be developed in general conformity with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). It is important that local policy documents support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network. Whilst TfL is broadly supportive of the **transport polices** set out in the EAP, suggested amendments are detailed in the comments in Annex 1.

Places

The aspirations for a comprehensive approach to development at Euston station set out Development Principle **EAP1 Euston Station and tracks** are supported. The updates to the supporting text are noted and together are considered to provide clear guidance about the land use priorities and design/functionality expectations for both the stations and development above or adjacent to the stations. The deletion of the reference to Camden's planning policies applying flexibility in setting out planning requirements in the Viability and Funding section of the supporting text is welcomed.

Delivery, Planning Benefits and Monitoring

The reference in Section 5.1 **Delivery and Viability** to viability assessment being undertaken in accordance with PPG and GLA and LB Camden policy and guidance is welcomed, as is the specific regard had to London Plan policy regarding review mechanisms (noting the typo that 'review' is missing from before 'mechanisms' in the last sentence of the relevant paragraph). However, as per our Regulation 18 response it is the GLA's preference that the wording is more explicit about the likely requirement for multiple mid stage reviews.

While the updated wording in Section 5.6 **Flexibility** responds to many of the points raised at Regulation 18, the Mayor remains concerned about the reference to a flexible approach to 'taller buildings' and this should be removed. The wording relating to flexibility applies an inappropriate emphasis on building heights being considered through assessment of viability at application stage, whereas the London Plan states that viability testing is to assess the maximum level of affordable housing.

The additional wording relating to what could be material considerations associated with railway infrastructure is sufficient to clearly acknowledge the constraints imposed by the station works and promote this as a factor in deciding planning applications in the area. There is no need to specifically refer to building heights, and doing so creates a lack of clarity and appears as if non-conformity with the LP2021 policy on LVMF is being built into the EAP.

Next Steps

I hope these comments positively inform the preparation of the Euston Area Plan. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Karen Montgomerie at [redacted]

Yours sincerely,

[redacted]

Karen Montgomerie

Team Leader Strategic Planning (Local Plans)

Cc: James Small-Edwards, Chair of London Assembly Planning and Regeneration Committee
Anne Clarke, London Assembly Constituency Member
National Planning Casework Unit, MHCLG

Annex 1: Specific suggested edits and comments from TfL on the draft Euston Area Plan update

Document Reference	Track Change comment
General	The proposed bus station is still not included in most of the plans. We would therefore request it is added/ amended where relevant (e.g. where other proposed transport infrastructure is being shown) to show its current proposed location. The document should make clear reference to the need for the station complex to provide an enhanced bus station which will support future demand and help encourage modal shift to sustainable transport modes and the importance of maintaining this transport interchange. Similarly, the phrase 'bus facilities' has been used instead of 'bus station' throughout the document, and we think this should be amended to make it clear we are talking about a bus station (when talking about the proposed linear facility), as is currently provided on the site. Additional bus facilities e.g. new bus stops may be provided in addition to this.
General	With a few exceptions, the drawings are showing e-w and n-s walking connections. The delivery of these connections isn't currently feasible and so it should be made clearer that these are indicative long-term aspirations. The same goes for proposed HS2 station entrances, as some of those shown are aspirational. Reference could be made to safeguarding/ enabling options which would help improve permeability through the site, so that new N-S and E-W pedestrian links can potentially be delivered in the future, even if they are not feasible from day one The proposed Gordon Street LU entrance (as shown in fig 3.5) is also missing in a number of the plans.
General	Each figure used within the EAP should use consistent language. Key suggested changes: • New London Underground Entrances – To be caveated with potential or indicative • Healthy Streets Project Scope - This does not reflect the EHS programme scope, there needs to be rewording (Potential Healthy Streets improvements) or redrafting of the image to include the EHS limits, which can be provided. • The graphics need to be updated to reflect the fact cycle lanes were discounted for Euston Road. • Wording on all graphics needs to be consistent
General	Use of % or per cent needs to be consistent – recommend LBC review and amend.

R27

Document Reference	Track Change comment
General	When referencing ULEZ, it would be good to show the improvement this has made alongside highlighting the ambition to go further.
Throughout	Euston Healthy Streets is referred to as a project. It should be recognised in this document as a programme of works, which has individual projects within it
Throughout	Any reference to a "one-way" linear bus facility should be removed. This hasn't been decided and it is TfL's preference that two-way option is selected. Suggest only referencing a "linear" bus station until an option is formally accepted.
Throughout	All timescales that are shown for the delivery of transport projects on the TLRN need to be caveated with indicative – they will be subject to funding decisions and HS2 timescales
Throughout	The tone of wording around the existing bus station should be reviewed. Buses are an important mode of public transport, especially for those on lower incomes and with mobility requirements and need to be planned for accordingly. Euston Road is a strategic east-west traffic connection but is earmarked for numerous conflicting demands on finite space.
P.26 - Figure 2.2 Key issues identified in 2015 EAP	Suggest removing the word intrusive from "Poor public realm at front of station and intrusive bus infrastructure" in the key
P.30	We would recommend the following statement be removed or re-worded, 'The quality and use of Euston Square Gardens is compromised by the current bus station arrangement'. The current station design is a very efficient use of space, which enables convenient bus to bus and bus to other modes interchange, alongside an essential operational function, within the constraints of the surrounding terrain and highway layout.
P.31 - Transport and public realm 5th bullet point	Suggest removing "The existing bus station arrangement provides important interchange facilities but is poorly designed in terms of the wider public realm and movement, creating an unattractive pedestrian and cycle environment." The bus station provides an important function (as detailed above), and this needs to be retained as part of the redevelopment of the site. There is no road user hierarchy in the MTS, so these modes should all be considered equally.
Safety and security p65	There is currently a focus on strategies which help support ending violence against women and girls, with the government publishing a policy paper on this topic at the end of last year. This is also an area of focus for the Mayor. and we would therefore recommend that specific wording is included around the need to consider/ implement measures specifically targeted around improving the public realm/ walking environment for women and girls.

R27

Document Reference	Track Change comment
	When submitting planning applications which are referred to the mayor, developers will be required to undertake night-time active travel zone assessments as per TfL guidance (night-time-atz-advice-revbapr2025.pdf), and there may be role for women's safety audits, so local residents and other regular users of the space can help identify the current issues they face and what improvements might help resolve them. This requirement could be referenced somewhere in the document.
Strategic Principle EAP 2- p73	The above comments on women's safety would apply, and could be embedded in part B of the policy
P.79 - Strategic Principle EAP 3: Transport	"Providing for the effective and sustainable movement of people, *with the vast majority of onward journeys to and from Euston made by walking, cycling and public transport"*. It would be good to include a breakdown of this as you have for the journeys originating in Euston. Targets are mentioned but not the current situation.
Fig 3.3 p75	Above comments on the maps apply. As stated elsewhere, implementing walking routes over the station currently isn't currently considered feasible and this should be reflected in the associated wording, acknowledging it remains a long-term aspiration
P.79 EAP3 A	Suggest references to providing e-w links across the station are suitably caveated, given that we know the delivery of these aren't currently feasible. When referencing bus journey times, it might be useful to specifically reference support for suitable bus priority measures being implemented within the EAP boundary. This should be factored into the future design decisions around the bus station to ensure proposals don't have an overall adverse impact on bus journey times.
p.81 EAP3 C	Suggest either here or elsewhere in the policy, a reference is made to the need for future planning applications to be supported by the most relevant, up to date transport modelling, as agreed with TfL/ LB Camden. This will be needed to help inform what, if any transport/ infrastructure improvements may be required to support the delivery of the scheme.
P.80 - last paragraph	Request that wording here is changed - sets an expectation that we are exploring cycle segregation on Euston Road which has been ruled out. The proposals on Hampstead Road are in feasibility and subject to further modelling.
P. 82 - Figure 3.5 Transport Strategy illustrative masterplan	In the key replace 'Indicative locations for bus stops or stands' with 'Indicative location for bus station' and add Buses roundel. The image suggests there isn't a replacement bus station and promotes dispersal of bus services onto Euston Road, which is inconsistent with the public transport improvement objectives alluded to elsewhere in the document and discussions underway regarding a linear facility. As referenced elsewhere, for the avoidance of doubt, we'd suggest all plans should show the proposed bus station in a consistent way

R27

Document Reference	Track Change comment
P81 EAP3 B	Would recommend the following requirement is separated out so the bus requirements are separate to those for pedestrians and cyclists • *Improvements to bus facilities that meet TfL's operational and passenger requirements*. This should also reference the need to maintain bus journey times as part of the future plans for the bus station • *Improving the environment for pedestrians and cyclists and enhancing the public realm and Euston Square Gardens*
P82 Fig 3.5	This map highlights that the e-w walking routes over the station are a long-term aspiration and shows the bus station and proposed tube station entrances in indicative locations. We would recommend that the transport measures are shown in the same way on all relevant maps.
P.83	It should be noted that the Mayor's Transport Strategy does not have a road user hierarchy, with the focus instead being on supporting measures that encourage travel by walking, cycling and public transport. The commitment to enabling the delivery of the objectives of TfL's 'Bus Action Plan' are welcomed, and this should be considered as the designs for the bus station evolve.
P.83	We would suggest the following wording is updated "*Euston has a poor road safety record with high rates of collisions resulting in people being killed or seriously injured*." We have implemented some highway improvements and there haven't been any fatalities in recent years. Focus should be on delivering improvements in priority locations, as identified in the Transport Study.
P.85	SP – Granby Terrance
P.85	*'Improvements to footways around the new underground entrance on Gordon Street (if it is delivered), to accommodate increases in pedestrian numbers'*. Improvements will likely be required in this location anyway as this is a pedestrian desire line. The form these improvements take will depend on if/ when the new underground link between Euston and Euston Square LU stations are delivered and as such the wording may benefit from some general wording identifying this as a key pedestrian desire line in need of improvement.
P.86, Paragraph 1	"These crossings should also accommodate cycle crossing movements if these are not catered to within redesigned junctions." Suggest adding the caveat *'where possible these crossings will…'*
P.87 1st Bullet	"Upgrading Euston Road, Hampstead Road and Eversholt Street (through the Euston Healthy Streets scheme), to better support cycling, alongside walking and buses, improving road safety and reducing the dominance of general traffic". Suggest removing the word alongside, as this suggests cycling is the priority whereas on Euston Road cycle provisions have been discounted as other priorities have been identified for this corridor.

R27

Document Reference	Track Change comment
P89/ 90 and p99	It should be ensured that any shared mobility measures e.g. dockless bikes, are provided in locations that won't conflict with pedestrian desire lines given that the very high volume of people expected to be moving through the area in the future. Studies should be undertaken if needed to identify the best location for these.
P.90 - The key transport aspirations for the redeveloped stations	In the 3rd bullet point replace "To provide a new one-way linear bus facility…" with "To provide a new bus station facility…". It's too early to refer to a one-way linear bus facility while the design hasn't been agreed. Bus stations are more than just stops and stands, they also provide other passenger facilities and information and this will need to be factored into the new bus station designs being developed, We'd also suggest removing "As such, Euston Square Gardens and its character should be retained along with access for all users"
P.92 Bus Facilities	The paragraph headed 'Bus Facilities' needs to acknowledge/reference the bus station. I suggest the following wording; …..'upgrade the existing bus station at Euston. It provides an opportunity to establish an improved bus station that meets TfL's passenger and operational requirements…..'
P93 fig 3.11	Existing bus stops are currently missing from the map of public transport connections. The new LU station entrances should be marked as indicative. It might also be beneficial to include the Crossrail 2 safeguarding on this, or another map so it is clear what land is in question when we reference safeguarding.
P.94 - Bus facilities	Heading 'Key requirements of the bus facilities include' - suggest rewording to 'Key requirements of the replacement bus station include:' 1st bullet point - 'Providing sufficient stop and stand space to accommodate an agreed level of bus operational requirements, including driver welfare facilities.' - suggest rewording to 'Providing sufficient space to meet TfL's passenger and operational requirements, including driver welfare facilities.' 1st bullet point- suggest removing "Any bus standing facilities will need to be demonstrated as being operationally essential, (given the existing space constraints on the delivery of this major multi-modal transport hub), and locations within the station site should be prioritised' as all bus standing requirements are identified on the basis of supporting the efficient operation of the bus network, Suggest replacing "It is acknowledged that some bus stops may need to be located on Euston Road" with "It is acknowledged that some bus stops may need to be located on highway" 3rd bullet point, suggest removing "…and cyclists,…" from the first sentence. Cycle movements should be segregated from the bus facilities within the bus station for safety reasons. 6th bullet point, replace "… and should minimise impact on the wider transport network…" with "… and should enhance/optimise the wider transport network…"

R27

Document Reference	Track Change comment
P.95 - Bus facilities	Last paragraph, replace "It is expected that the new bus station would have a linear format and that it would be located off highway at the front of the station along the northern edge of Euston Square Gardens." with "It is expected that the new bus station would be located off highway at the front of the station along the northern edge of Euston Square Gardens." and remove "Camden's aspiration is for this facility to be one-way but the exact layout will be determined in future design stages." We'd also suggest that both here and throughout the document we reference a 'replacement bus station' rather than a 'new facility' given the existence of an existing bus station on site and the fact that we need to replace with a new, fit for purpose facility, rather than deliver something that doesn't currently exist.
P.119 - Paragraph 7	"The existing bus station arrangement at the front of the station is dated, impermeable and whilst it works well operationally and as an interchange it provides a poor setting for the station and gardens in design terms." Wording should be revised as without the interim taxi-rank, the bus station has through routes and is offering a valuable service to both commuters and local residents
P.121Fig 4.2	Transport infrastructure should be shown consistently on the plans. This is missing the proposed LU entrance on Gordon Street and the indicative bus station etc. E-W walking routes should be shown as a long-term aspiration as referenced elsewhere.
P.125 Functionality para 5	'Interchange with buses and taxis……., not necessarily confined to a single location'. It's not clear what that means, so could potentially be re-worded to make the emphasis clearer.
P.132 - Bus facilities	Overall it should be clear in this section that the scale of the bus station needs to provide sufficient space to meet TfL's passenger and operational requirements as mentioned elsewhere in the document. Some specific suggestions include: * 2nd bullet point, remove 'one-way' from 'Providing a one-way linear arrangement' (as per previous comments) …..'and reduced barriers (to the current bus facility') also needs to be removed. * 3rd bullet point, suggest removing 'to be of similar scale to the surrounding street network, and' * Remove 4th bullet point, 7th bullet point captures the need to provide ped crossings that meet desire lines * 5th bullet point buses should be the priority in this 'Gateway' station location.. The terms stops and stands are being used interchangeably, so it should be made clear what is being referenced given they serve different functions and have different requirements,
P.132 - Bus facilities	8th bullet point, remove 'and removing bus movements from within the open space'. There is existing bus infrastructure in the space and this will likely need to continue.

R27

Document Reference	Track Change comment
P.132	As per comments above, it is too early to commit to a linear bus station layout. The plans for the bus station are still at the feasibility stage and subject to change. Safety will be a primary concern when designing the future bus facility, however there are limited places the bus station can go and so ensuring an effective design will be paramount. Buses are a key mover of people in the area, and it will be important that suitable design solution can be found, whilst acknowledging there is also an aspiration to improve the public realm. We would however recommend the word 'balance' is removed given the importance of delivering an essential and functioning bus station in this constrained location.
P.142 'infrastructure requirements'	Is it worth explicitly referencing the transport infrastructure requirements in this section and what transport improvements contributions might be required towards. Infrastructure requirements under this location include the need for a replacement bus station and new LU station entrance.
P.145 4.2 Euston Road	Para 2- needs to mention the inner-ring road and function as a strategic freight corridor. Para 5- this is a repeat of Paragraph 7 on P.119 - suggest removing or re-wording
P.146 – EAP 2	Para B- there should be an acknowledgement that if there are to be new bus stops introduced on Euston Road this will potentially limit what can be done with the space and may influence what other improvements can be delivered in the nearby vicinity, as the focus will be on ensuring there is adequate waiting space for bus passengers etc. Also, stops on Euston Road suggests dispersal of services and could not reasonably be considered to be part of the bus station.
P.147 fig 4.3	As above, new LU station entrance locations should be marked as indicative.
P.148 - Active frontages	Elaborate on what negative frontages would comprise of.
P.150 - Improved bus facilities	2nd paragraph under 'Improved bus facilities', suggest removing 'ensuring that they do not impede impact on the safety of pedestrians and cyclists' as this will be integral to the design process anyway. ….'bus facilities to be delivered to complement pedestrian and cyclist improvements'……needs rewording as currently suggests buses are 3rd priority?!
P.149 - Paragraph 1	"Enhance and enlarged pavement space" - this needs to be caveated with where possible Bullet 4- Importance of sub surface link needs to be expanded on. It allows more to be done at a surface level if pedestrian movements can be shifted.

R27

Document Reference	Track Change comment
	Cycle infrastructure on Euston Road is not being considered and has been discounted. This needs to be reworded to focus only on the alternative routes that already exist in the area Improved cycle routes, Bullet 3- need to be caveated with where possible, will be explored.
P.150 - Sustainable future of Euston Road. Transport Corridor Role – Paragraph 2	Suggest removing "as part of the Euston Healthy Streets Project" as improvements may not just be delivered through EHS. Suggested alternative, Camden will work with TfL to … There is still no recognition for the strategic role of the Inner Ring Road - it is important that this is stressed.
P.182 EAP4	As referenced above, Euston Healthy Streets is a programme of works, not a project.
P.183 Fig 4.5	Review labelling of map as it is not consistent throughout e.g. indicative new LU station entrance not shown on key
P.186 - Enhance Hampstead Road Public Realm	"Hampstead Road is a key cycle route and cycle lanes should be introduced to link with the wider network of cycle lanes across central London." All proposals are still in feasibility and will be subject to modelling outputs
P.187 - Greening of Hampstead Road	Change "will be implemented" to "will be considered"
P.244 - Appendix 2	Any timescales should be caveated with indicative until a clearer understanding of HS2 is delivered.
P.248 Project List	Enhanced and new bus facilities – suggest re-wording to Enhanced replacement bus station.
P.250 - Row 4 Row 7	Missing word - "Gordon Street" Suggest rewording to 'Enhanced replacement bus station'
P.252 - Row 3	Suggest "Healthy Streets Crossing Improvements" to replace the project name.

R28

Text to the response from Hero Granger-Taylor to Euston Area Plan Update

I am sending this as a separate file because, despite trying a range of methods, I have found it completely impossible to write anything in addition to my personal details onto your form.

There also seem to be problems with the format of the EAP document itself. I noted that the heading at top left of the pages did not concur with the relevant section of the document. Also, in the form, the question whether the document 'Complies with the duty to co-' is left hanging like this without the necessary 'operate'.

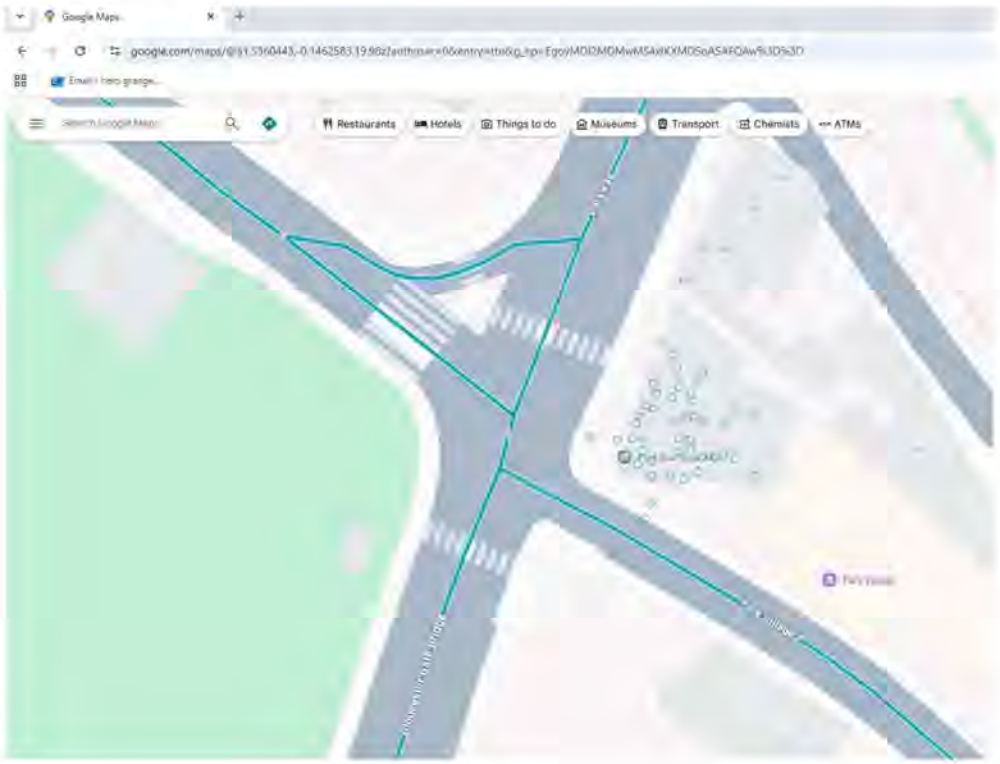
My comment is about section 4.3 'Camden Cutting' and the naming of places and areas.

I am [redacted] Here our homes are directly threatened by HS2 – the tunnelling in the 'Euston Approaches', i.e. below the cutting and below [redacted] itself, is due to do a lot of damage to the grade II* listed houses here. [redacted]

The name 'Camden Cutting' goes back to the early stages of HS2 consultation when people living nearby insisted that it not be called the Euston Cutting, as first desired by HS2 Ltd, as this was a misrepresentation: in our view it sought to deny that there was such a thing as a local community. In fact, those of us living north of Mornington Street bridge are at least 1 km away from Euston station itself.

It is very disappointing that this document too calls everything comparatively close to the railway 'Euston'. The EAP itself should be called 'Euston and the Camden Cutting' or 'Euston and Hampstead Road to Parkway' and not just plain Euston.

Please also note that whoever has drawn up the map on p. 165 has mistakenly written 'Gloucester Gate' at the top of the area defined – in fact, Parkway extends as far as Park Village East. (The road between Park Village East and Albany Street is Gloucester Gate Bridge with Gloucester Gate proper beginning beyond Albany Street>)



There is also an error on the map where the southern part of Park Village East is bordered by green dots, these dots apparently indicating 'existing roads within Euston Healthy Streets proje[ct]'. In fact, none of Park Village East is a so-called Healthy Street. On the contrary, it is an official HS2 lorry route. (Meanwhile the Arlington Road Healthy Streets Area prevents us driving to anywhere to the east of us.)

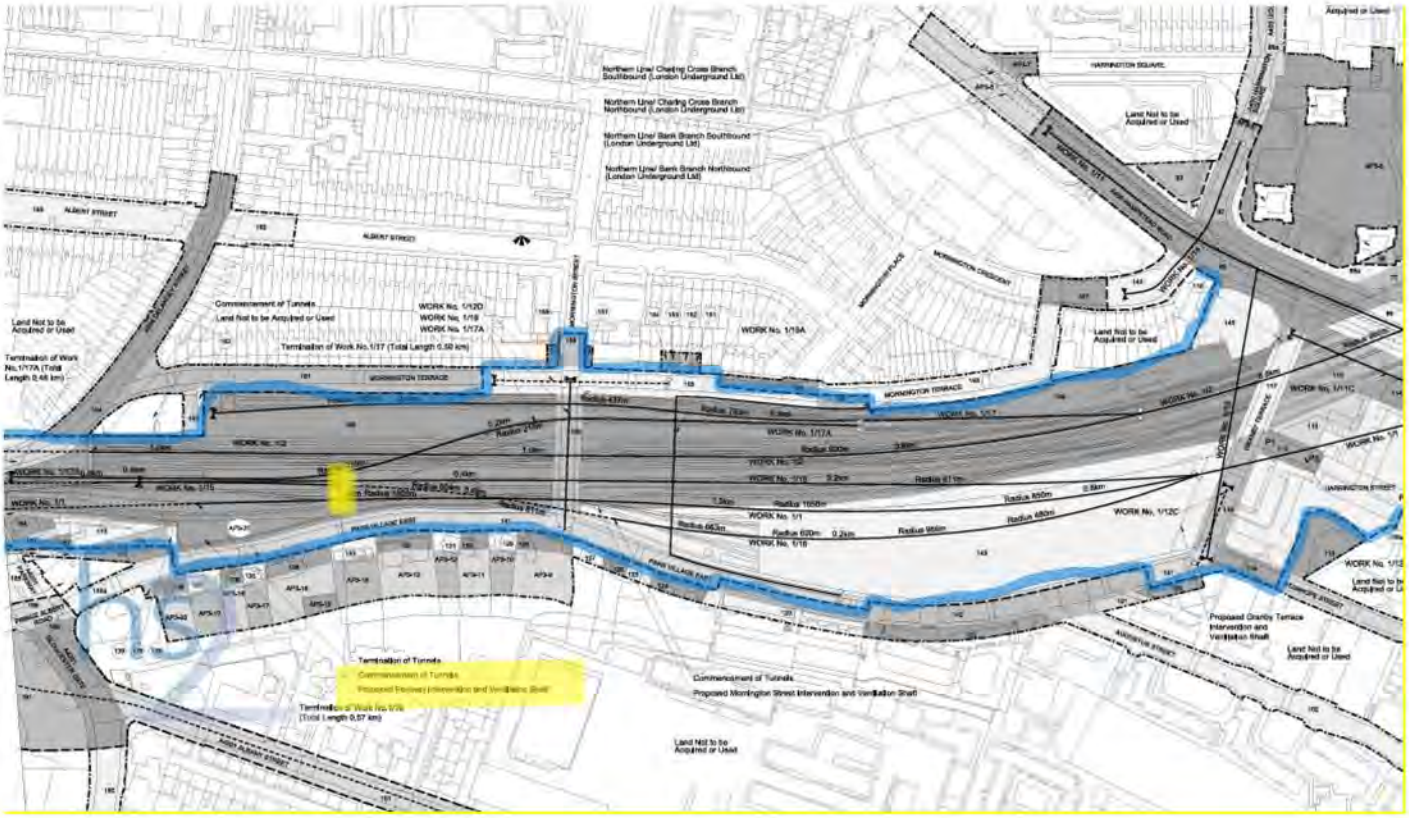
Unfortunately, Camden's use of the 'Euston' as a blanket term fits in with an established pattern of misrepresentation. In the Government's Press Release on HS2 of 27 January 2026, https://www.gov.uk/government/news/major-milestone-for-hs2-as-tunnelling-to-euston-starts , it is stated that *'the first of 2 HS2 tunnel boring machines begins its journey from Old Oak Common to Euston station'* and *'a huge tunnel boring machine started its passage from Old Oak Common in the capital's west, to Euston station'*.

Yet we who live locally know very well the Tunnel Boring Machines are not going further than the Cavern which it is intended to build below the junction of Parkway with Delancey Street and Gloucester Avenue. (The tunnelling below the Camden Cutting and Park Village East, due to happen, but so far unfunded and not yet commenced, will be by excavation, not by TBMs).

And so it goes on. HS2 Ltd themselves are now also using the term 'Euston station campus' https://www.hs2.org.uk/building-hs2/stations/london-euston/ Goodness knows how far this so-called campus is meant to extend, if, as already illustrated, according to HS2 Ltd and DfT, 'Euston station' extends as far as Parkway.

In more detail, we read that two headhouses in Park Village East are called respectively the Euston Cavern headhouse and the Euston Portal headhouse: https://www.hs2.org.uk/building-hs2/tunnels/twin-bore-tunnels/euston-tunnel/

Yet, in the maps accompanying the 2017 Act, the further north of these two headhouses (admittedly at that point attached to a different design) is called the Parkway Headhouse: *Proposed Parkway Intervention and Ventilation Shaft.*



R28

It is also noteworthy that the existing West Coast line, where it goes under Parkway, uses what are still called the 'Park Street tunnels' https://en.wikipedia.org/wiki/West_Coast_Main_Line . Park Street of course is the old name for Parkway (it was changed to Parkway so that it would not be confused with another street with the same name).

Camden needs to stick to the names used for local places before HS2's and the DfT's PR departments became out of control.

Re other points, I am not commenting on the impact of the proposed housing on the southern part of Park Village East as I am leaving this to my neighbours who live close by.

The proposal to extend access for walkers from the southern end of Park Village East right up to Hampstead Road is a good one. Walkers need also to be fully accommodated on Granby Terrace bridge.

Hero Granger-Taylor, [redacted] 3 March 2026

R28 Outlook

Response to EAP consultation - form with separate text

From hero granger-taylor [redacted]
Date Wed 04/03/2026 15:30
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

2 attachments (983 KB)
Text to the response from Hero Granger-Taylor to Euston Area Plan Update.docx; EAP-Update-Consultation-Response-Form-3 partially completed.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.

Please attached find the form partially completed, also my comments as a Word document.

I was not able to write the comments on the form itself.

Hero Granger-Taylor

[redacted]

R28

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	Hero	
Last Name	Granger-Taylor	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1*	[redacted]	
Address Line 2		
Post Town*		
Post Code*		
Telephone No.		
E-mail Address		

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:	Hero Granger-Taylor

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	4.3	Policy		Policies Map	

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

1) Legally compliant	Yes		No	x
2) Sound	Yes		No	x
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	X
3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	X
4) Consistent with national policy	

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.

(Continue on a separate sheet if necessary)

R28

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.

(Continue on a separate sheet if necessary)

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.*

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

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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:		**Date:**	

Notes to accompany the Representation Form

1. Introduction

The Proposed Submission Draft Euston Area Plan Update is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when it submitted for examination a Planning Inspector. Under the Planning and Compulsory Purchase Act 2004 (as amended) (PCPA) the purpose of the examination is to consider whether the Plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

During the examination, the Inspector will first check that the Plan meets the legal requirements under s20(5)(a) and the duty to co-operate under s20(5)(c) of the PCPA before moving on to test for soundness.

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

- The Plan in question should be included in the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the council, setting out the Local Development Documents (LDDs) it proposes to produce. It will set out the key stages in the production of any Plans which the council proposes to bring forward for independent examination. If the Plan is not in the current LDS it should not have been published for representations.
- The process of community involvement for the Plan in question should be in general accordance with the council's Statement of Community Involvement (SCI). The SCI sets out the council's strategy for involving the community in the preparation and revision of planning policy documents and the consideration of planning applications.
- The Plan should comply with the Town and County Planning (Local Planning) (England) Regulations 2012 (the Regulations). On publication, the council must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.
- The council is required to provide a Sustainability Appraisal (PDF) when it publishes a Plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors

You should consider the following before making a representation on compliance with the duty to co-operate:

- Councils are expected to provide evidence of how they have complied with any requirements arising from the duty.
- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the Plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the Plan.

3. Soundness

Local Plans or Area Action Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Paragraph 36 of the National Planning Policy Framework (NPPF) sets out the tests of soundness. The Inspector has to be satisfied that the Plan is positively prepared, justified, effective and consistent with national policy.

- ***Positively prepared***

This means that the Plan should be prepared based on a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.

- ***Justified***

The Plan should be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.

- ***Effective***

The Plan should be deliverable over the plan period and based on effective joint working on cross-boundary strategic matters.

- ***Consistent with national policy***

The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

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

- Is the issue with which you are concerned already covered specifically by national planning policy? If so, it does not need to be included?
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

4. General advice

If you wish to make a representation seeking a modification to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to legal compliance, duty to cooperate and the four tests of soundness set out above.

You should try to support your representation by evidence showing why the Plan should be modified. It will be helpful if you also say precisely how you think the Plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made

at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues they identify for examination.

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

R29

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	LORRAINE	
Last Name	HAYWARD	
Job Title (where relevant)	[redacted]	
Organisation (where relevant)		
Address Line 1*		
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.*

R29

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	✓

R29

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.

They didn't consult properly.

One printout on the corner of drummond st.

In 2024. That no one saw .....
Even that, when the Euston plan was published.
the tower and the refit were not on it.
That was only added 23-12-25.!
the light in the square, the pollution. the
loss of green spacie. Also. the Euston tower
is about to be redeveloped. We are surrounded
by distruction.
the Anxiety and Mental stress to everyone
in the square
the tower and Office space NO use to help
camden homeless. Just for private sale..
the NHS actually use the building there!
and has many years of use yet.
The needs of the commuity have not been met

(Continue on a separate sheet if necessary)

R29

Euston Area Plan Update – Proposed Submission Draft 2026 - Representation

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.

NO Tower.

Refit Rather than demolish.

All existing buildings height to be preserved.

to protect Tolmer Sq. and North Gower St.

Also the NHS USE THE BUILDING AT

present ..... [redacted] is [redacted]

"[redacted]"

(Continue on a separate sheet if necessary)

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 as working class residence of Central London want our voices 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.*

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

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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:**	25-02-26

R30

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	PHIL	
Last Name	HEARY	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1*	[redacted]	
Address Line 2		
Post Town*		
Post Code*		
Telephone No.		
E-mail Address		

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:

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	✓

R30

Objections

It is not possible to conclude that the Euston Area Plan Update concerning sites EA4 and EA5 is legally compliant, due to failure to consult with the local community, and procedural compliance.

1. CONSULTATION: The plan has not been drawn up with the involvement of local people and businesses. The proposals therefore fail to address the issues that affect the local community, including health inequality.

2. NEGATIVE HEALTH IMPACT: The proposals for sites EA4 and EA5 will cause long-term impact on the residents of Tolmers Square, North Gower Street, and the immediate local community due to loss of skylight, sunlight, greenspace, privacy, amenity. This is counter to the objectives of the EAP to improve health and well-being.

3. GREENHOUSE GAS EMISSIONS: The clear implication of site allocations EA4 and EA5 is that the existing fit-for-purpose buildings are demolished and replaced with new buildings. The un-necessary demolition of fit-for-purpose buildings is against Local and National planning policies which require that existing buildings are retained where possible to mitigate climate change.

4. NEGATIVE IMPACT ON LOCAL HEALTH SERVICE: The proposals will have a negative impact health, due to the displacement of the existing healthcare services from site EA4. UCLH Foundation Trust have leased this building for 20 years and it is of strategic importance to their operations in the area, including the parking facility accessed from North Gower Street. They wish to remain in the building.

5. HERITAGE: By introducing large, tall buildings at the south of the Drummond Street area, there is an unacceptable risk to the historic buildings and social and cultural character of the whole area. Mature trees and historic greenspace would suffer as they fall within the site for EA4.

I do not believe that the EA4 / EA5 proposals have been positively prepared, and that they have been added to this update to make up for shortfalls elsewhere in the EAP.

I feel there is insufficient evidence to demonstrate that the EA4 / EA5 proposals are effective, or justified (re-fit versus demolition).

Modifications to the update

In order to make sites EA4 and EA5 legally compliant and sound, all existing buildings on these sites should be re-fitted rather than demolished, in line with Camden's Climate Action plan,

250 Euston rd was built in 1981, and so is only 45 years old. This building has historic value which should be protected. It has been occupied by the UCLH foundation for the last 20 years, and is a strategically important site for this organisation, who hold the lease until 2039.

The mature trees and gardens which fall within site EA4 should be preserved and protected.

Camden and associated property developers should properly notify and consult with the local community with regards any future proposals and planning for these sites.

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:

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

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

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

Historic England

Our ref: [redacted]

Euston Area Plan Team
London Borough of Camden
5 Pancras Square
London N1C 4AG

By email: eustonareaplan@camden.gov.uk

6 March 2026

Dear Euston Area Plan Team

London Borough of Camden – Euston Area Plan Regulation 19 consultation

Further to our letter of 3 March in response to the Regulation 19 version of the Plan, I write to offer further detail on Historic England's position on the issues identified. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process. Our comments are made in the context of the principles relating to the historic environment and local plans within the National Planning Policy Framework (NPPF) and the accompanying Planning Practice Guide (PPG) and if the Plan therefore sets out a positive strategy for its conservation and enjoyment (para 203).

We would again emphasise the sensitivity of the local context in heritage terms given both the presence of a number of strategic views that cross the area, together with a significant number of highly graded designated heritage assets both within and beyond the Plan area. Together with the development pressure that exists, the potential for effects on significance are clear as a result. Given this, we would stress the importance of a clear relationship between the Euston Area Plan and the emerging masterplan for the Network Rail station.

As set out in our previous letter, we note the iterative nature of the document, and the retention of much of the text of the adopted Plan. This is to be welcomed. However, we consider that the inclusion of a number of new draft site allocations, together with the evidence that underpins them, creates several issues for the Plan in terms of its justification and potential effectiveness.

In certain cases, the modelling within the background report demonstrates potential effects that we consider would harm the significance of designated heritage assets, including some of the highest grade. While heritage constraints have largely been identified in relation to the site

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

allocations, in a number of cases we do not consider the draft site allocation policies offer a robust mechanism to ensure development proposals conserve significance. Taken together, we consider this would mean the Plan would allow for a degree of unspecified harm to the historic environment, contrary to the NPPF's requirement for a positive strategy.

We note the supporting text to Strategic Principle EAP2 Design at the top of page 73 of the consultation draft: '*The general heights shown would allow development that does not encroach into Protected Vistas (Landmark Viewing Corridor and Wider Setting Consultation Areas) identified in the London View Management Framework SPG.'* However, the modelling in relation to various views included within the background report appears to show massing of a number of site allocations both within the wider setting consultation areas and in the viewing corridor. This creates ambiguity and requires clarification.

As with our previous letter, we would emphasise the importance of assessing the effects of tall building proposals on the historic environment at a stage of the planning process that means they can be avoided and/or mitigated. This is particularly important given the sensitivity of the Euston Area and the potential visibility of the buildings envisaged. We are concerned that the effects of some of the draft site allocations have not been fully understood at this stage and would suggest that further work is necessary to appropriately inform the Plan and the site allocation policies. Further details of such an approach can be found at The Historic Environment and Site Allocations in Local Plans.

Further detailed comments in relation to potential effects on specific heritage assets are set out below. In overall terms, we have concerns as to the evidence and assessment that underpins the approach to the site allocations as well as the specific effects of a number of them. This poses questions as to the soundness of the consultation draft in relation to its justification and effectiveness.

View 20 – Regent's Park towards St Katharine's Church (GII*): As indicated in our previous letter, we consider the modelling within the background report clearly demonstrates harm to the setting of the Church from site allocations EA9 and EA10. The open nature of this area of Regent's Park creates the ability appreciate the twin spires of the Church through an uninterrupted view with an open sky background. Given its height and the twin spires, the Church is highly prominent in this view, appearing above the tree line and being taller than other buildings visible. The proposed site allocations would appear beside and behind the Church, distracting from this prominence and competing with the spires for attention.

We note the inclusion of text within the site allocation polices that proposals are subject to testing of impacts on LVMF and relevant local views. Given the significance of St Katharine's

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Church, and the contribution of its setting to this significance, we consider that specific text to ensure proposals conserve its significance should be included here. We would be pleased to discuss precise wording to achieve this.

Views 23 and 24 – towards Chester Terrace: We note the retention of text from the adopted local plan in relation to potential effects of tall buildings on Chester Terrace and views from the grade I registered Regent's Park. This is replicated elsewhere in the plan in relation to certain site allocations. However, we consider that this is ambiguous given the modelling. While this demonstrates that proposed building heights would not be visible from the junction of Chester Road and the Broadwalk towards the Plan area (view 23), it also shows buildings above the roof line of the terrace from the junction of the Inner Circle and Chester Road. We are given to understand that one of these buildings is lower than 60m.

As such, the retained text that indicates '*A taller building to the north-east of the station (as shown in location B in figure 3.4) would need to be less than 60 metres tall from approximate ground level (which equates to between 82 metres AOD and 84 metres AOD) to not affect the setting of, and views within and of, nationally important heritage assets including Regent's Park and Chester Terrace'* is problematic. The modelling appears to demonstrate both that buildings below 60m would create effects, and that the upper range massing for relevant site allocations would also appear above the roofline.

Chester Terrace is listed at grade I. Designed by Decimus Burton and completed in 1825, the terrace terminates the designed axial view along Chester Road from the Inner Circle (the focal point of Regent's Park). It also forms part of John Burton's vision for the remodelling of a substantial part of central London. The proposed heights of the tall buildings in question would in our opinion affect the setting and significance of the Terrace, and would further disrupt a view that was designed to show a row of buildings of coherent architectural unity.

The existing tall building at Brill Place clearly harms this view. We consider that proposed buildings at location B and site allocation EA10 would create cumulative harm to the setting and significance of the Terrace if developed at the modelled lower capacity range. If buildings were to come forward at the upper range, they would obscure the Brill Place tower and present taller and more intrusive effects on the view. This would represent a greater level of harm.

As a result, we consider that the related text on conserving the significance of the affected assets where tall buildings proposals come forward in these locations needs to be revised to ensure it will achieve its objective. As with St Katharine's Church, we would be pleased to discuss a way forward.

Historic England, [redacted]

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I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

In the meantime, please do not hesitate to contact me should you require any further information.

Yours faithfully

Tim Brennan MRTPI
Historic Environment Planning Adviser
[redacted]

Historic England, [redacted]

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Historic England

R31

Our ref: [redacted]

Euston Area Plan Team
London Borough of Camden
5 Pancras Square
London N1C 4AG

By email: eustonareaplan@camden.gov.uk

3 March 2026

Dear Euston Area Plan Team

London Borough of Camden – Euston Area Plan Regulation 19 consultation

Thank you for the opportunity to comment on the draft Euston Area Plan. We would be grateful if you would note that this letter is an initial response to the consultation draft intended to set out Historic England's broad position in relation to a number of issues. Further detail in relation to these and our analysis will be provided very soon.

We note the relatively light touch approach to the text and policy approach of the consultation draft version of the Plan. Clearly, the major change from the adopted version is the identification of a number of further site allocations across the Plan area, including the potential for tall buildings in particularly sensitive locations. Our comments therefore relate to the approach taken to date to arrive at these locations and potentially appropriate heights, together with some of the impacts demonstrated as a result of the modelling available in the background report.

Firstly, while we would note and acknowledge that affected designated heritage assets have been identified and referenced across the Plan and its site allocations, we are concerned that their individual significance has not played a sufficient role to this point in determining height ranges specified in the Plan. Given the sensitivity of the Euston area in historic environment terms, together with the visibility of the potential tall buildings both in local and longer-range views, we would expect an analysis of significance to be applied in understanding where and to what degree it would be affected, and to arrive at appropriate heights and design parameters that seek to avoid harm.

LVMF View 4A1 Primrose Hill to St Paul's: We note the protrusion of the proposed building line above the LVMF threshold demonstrated in the modelling in relation to both the lower and

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upper ranges tested, including within the protected vista. Together with the taller buildings at either side (that would potentially create a closer 'canyonising' effect), we consider that this would be harmful and should be given further consideration.

LVMF 5A2 Greenwich to St Paul's: While we note the harm created by 1 Euston Square has been removed by its demolition, we consider the opportunity for new development this creates should seek to reinforce the enhancements that have already been secured. The modelling demonstrates that development would wrap around behind the drum of the Cathedral, while the buildings to the right add further to the cumulative harm within the view. We consider that a different approach to development that redistributes the massing of new buildings in such a way that harm to significance is avoided is necessary here.

View 20 – Regent's Park towards St Katharine's Church (GII*): Both the lower and upper ranges of capacity testing demonstrate effects on the Church. Tall buildings, particularly those proposed on site allocations EA9 and EA10, would appear in the view and potentially create harm to the significance of the Church. While we note that the modelling is based on capacity testing, the relevant site allocation policies require clear requirements to avoid such harm.

Views 23 and 24 – towards Chester Terrace: We are concerned that tall buildings in location B and site allocation EA2 would create harm to the grade I listed Chester Terrace and to the views from grade I Regent's Park. It has been established that the existing Brill Place tower harms these views, and we consider that any further effects on Nash's designed views should be avoided. We consider that the publicly available modelling clearly demonstrates these effects, and further amendments are necessary to the text of relevant site allocation policies to make clear the sensitivities around potential effects.

I trust these comments are helpful. Please note that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.

In the meantime, please do not hesitate to contact me should you require any further information.

Yours faithfully

Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
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Tim Brennan MRTPI
Historic Environment Planning Adviser
E-mail: [redacted]

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Outlook

Fw: Historic England consultation response

From Therese Gallagher [redacted]
Date Wed 04/03/2026 09:39
To Rachel English [redacted] EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

1 attachment (388 KB)
Camden EAP response Reg 19 March 2026.pdf;

Therese Gallagher
Euston Manager
[redacted]

From: Brennan, Tim [redacted]
Sent: Tuesday, March 03, 2026 14:25
To: [redacted]
Cc: Therese Gallagher [redacted]
Subject: Historic England consultation response

[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 Euston Area Plan team

Please find attached a response from Historic England to the current consultation.

This is an initial response setting out HE's position. Further detail underpinning our comments in the attached will be sent through as soon as possible. In the meantime, please contact me if you would like any further information.

Regards

Tim Brennan

Tim Brennan MRTPI
Historic Environment Planning Adviser
London & South East Region
Historic England
[redacted]

Historic England

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[redacted]

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	Patrick	
Last Name	Allen	
Job Title (where relevant)	Partner	
Organisation (where relevant)	Hodge Jones & Allen LLP	
Address Line 1*	180 North Gower Street	
Address Line 2		
Post Town*	London	
Post Code*	NW1 2NB	
Telephone No.	[redacted]	
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:	Hodge Jones & Allen LLP

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		Policies Map	Euston Area Plan

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

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

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)	X
2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate	X
3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	X
4) Consistent with national policy	X

Euston Area Plan Update – Proposed Submission Draft 2026 - 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.

See attached submissions

(Continue on a separate sheet if necessary)

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

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.

See attached submissions

(Continue on a separate sheet if necessary)

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

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	X	**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:

in view of the omissions of the new proposals, the failure to consult & the history of the site, it is essential that we can make oral submissions to the inspector

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.*

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

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

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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.

[redacted]

11. Signature:	Hodge Jones & Allen LLP	**Date:**	27/2/26

R32

Euston Area Plan Consultation

Response and Submissions by Hodge Jones & Allen LLP

We are a firm of solicitors and our offices are at 180 Gower Street North, which is opposite Tolmers Square and in close proximity to the Euston Square Hotel. It has recently come to our attention that the Euston Area Plan Update, which has been the subject of consultation in January 2023 and July 2024 now contains proposals for two towers , one up to 23 storeys (75m) at 250 Euston Road and one up to 12 storeys at the Euston Square Hotel.

These developments were only brought to the attention of ourselves and to local residents at the beginning of February 2026. As you may be aware, a public meeting took place on 11 February 2026 at which some 40 local residents attended. Three members of Camden Council's planning team attended the meeting and were unable to answer questions from concerned attendees as to when these proposals were added to the plan update.

This submission if filed without prejudice to our contention that the consultation process is flawed and inadequate and that all proposals for the site should be referred to a new consultation under Regulation 18.

The decision to proceed despite this may be subject to judicial review.

Introducing the Tolmers Village Forum and a history of the planning battle to save Tolmers square from demolition 1973-79

It is essential that any new planning proposals for Tolmers Square take into account the historic community struggle to save Tolmers Square from demolition and development in the 1970s.

The Tolmers Village Forum (www.tolmers.net) was created by Patrick Allen (founding partner of HJA LLP) and Nick Wates to preserve and celebrate the history from 1973 to 1979 of the area we call Tolmers Village, a unique part of Central London close to Euston Station compromising Tolmers Square and the surrounding streets bordered by the Hampstead Road, Euston Road and Euston station.

In the 1970s the area was the subject of controversial planning proposals which finally resulted in a combination of comprehensive redevelopment and rehabilitation.

The Tolmers Village Forum website www.Tolmers.net tells the story of this time and contains over 3,000 photographs, accounts from some of those who were there at the time, and a great deal of other information including press cuttings, reports, books, film

and website links. In particular, the website documents the struggle with property developer Joe Levy and his company Stock Conversion & Investment Trust Ltd who wished to demolish Tolmers Square and build an office block similar to the Euston Tower on the other side of the Hampstead Road.

In the 1960s Stock Conversion were successful in buying up property to the north of Euston Road opposite Warren Street Station, then comprising a network of 19th century terraced houses and street markets. Coinciding with the building of the Euston underpass, the company obtained permission to flatten the area and the result was the construction of the massive Euston Tower and adjacent office buildings. The tower has been a blot on the landscape ever since, out of scale with the rest of the area and has created an unpleasant and windy environment for pedestrians. (It is now to be demolished and rebuilt on an even bigger scale).

Having achieved success with Euston Tower, Stock Conversion turned its attention to Tolmers Village. It hoped to achieve a similar development with demolition of the square of 19th century houses and surrounding streets and construction of a large office tower. It set about clandestinely acquiring houses and properties from local residents and businesses

which were then allowed to decay from lack of maintenance. Sometimes property was deliberately made uninhabitable by removing plumbing, wiring and roof slates to deter squatters.

Stock Conversion made its intentions known in 1973 and started negotiations with Camden Council to acquire the rest of the Tolmers property by compulsory purchase. In return for this and planning permission it promised to provide some council housing.

The scheme came to public attention and rapidly became a cause celebre. A campaign commenced to ‘Stop the Levy deal’. *Private Eye* journalist Christopher Booker and developer Bennie Gray highlighted the substantial profits that Levy stood to make from the scheme. They proposed a not for profit scheme of their own or suggested that profits could be retained by Camden if they did the development themselves.

A local community association was started in 1973, the Tolmers Village Association (TVA). A grant was obtained from the Rowntrees Trust to establish a community office in Drummond Street and employ Nick Wates, one of the Bartlett students, as coordinator. The association published a newsletter, provided advice to tenants and organised jumble sales, exhibitions and carnivals.

The entire area was now blighted by decay and planning delays. Many houses were empty and boarded up with corrugated iron. With a shortage of housing for young

people and next to no rental market, it was inevitable that the empty houses would be squatted.

Squatting was happening all over London at this time as there were large areas of empty houses boarded up awaiting redevelopment. Squatting was then not a criminal offence and the law prevented landlords from evicting squatters without a court order from a civil court. As a result, squatters were usually left alone until the time when the houses were ready for renovation or demolition, often several years.

Squatting took off in Tolmers Square, led by architecture undergraduates from the Bartlett School of architecture and planning who had carried out a project on Tolmers Square and in doing so realised the possibilities of so much empty property for temporary accommodation.

From 1973 onwards there was a steady influx of squatters taking over and renovating houses for temporary occupation in Tolmers Square, North Gower Street, Euston Street and Drummond Street.

The TVA office was now the focus for the fight against the Levy scheme. The TVA held an exhibition to highlight the scheme and to propose alternatives. A community plan was drawn up by some of the Bartlett students who were now squatting in Tolmers Square.

An alliance quickly formed comprising squatters, local tenants and businesses to oppose the Levy scheme.

The TVA reached out to Camden Counci for support, then led by Frank Dobson (who later became an MP and Minister).

Matters came to a head in 1975. Stock Conversion, tiring of the pace of negotiations with Camden, attempted to evict the squatters in its properties and issued summonses in the High Court. These were defended on procedural grounds with help from the legal aid scheme. Patrick Allen, a trainee solicitor squatting in Drummond Street led the legal team. A fully contested hearing on the first day resulted in one of the claims for possession being dismissed with costs and all others adjourned.

Stock Conversion then resumed negotiations with Camden with the result that Camden took over the entire development, buying out Stock Conversion‘s properties.

Architects Renton Howard Wood Levin were instructed by Camden to draw up a new scheme. This actually proposed the demolition of Tolmers Square itself (ironic after all the campaigning), the construction of the mirrored office block now known as 250 Euston Street, a remodelled square with pub, trees, lawn and social housing, demolition of terraces on the Hampstead Road and Euston Street and the construction of new social housing and the renovation of many other properties.

The destruction of the historic, horseshoe shaped square of grand 19th houses was pushed through despite opposition from local campaigners. This was a tragedy, but overall the development preserved the layout of the streets, local Bengali shops and restaurants and businesses and apart from the office block it was a low level and peaceful enclave of London which has endured to this day.

In 1979 when construction was about to start, the squatters were evicted and Tolmers Square was demolished shortly thereafter. The new development was completed by 1984.

All this is fully documented on the Tolmers Village Forum website www.tolmers.net. Much of the story is immortalised in Nick Wates' seminal 1976 work - the Battle for Tolmers Square https://tolmers.net/books/ and Philip Thompson's 1975 film, 'Tolmers Beginning or End?', https://tolmers.net/film/

Patrick Allen qualified as a solicitor in 1977 and in the same year, while still squatting in Tolmers Square, founded his law firm Hodge Jones & Allen (HJA) on Camden High Street. The firm flourished and after many years of steady growth the firm acquired offices at 180 North Gower Street where it still operates employing nearly 300 staff. Patrick retired from his role as senior partner and active legal practice in September 2025 but continues to take an interest in the area in which the firm is located and in which he lived.

Wrong urban design strategy

HJA supports the argument put forward by the Tolmers Village Association (TVA) and Tolmers Village Action Group (TVAG) in the 1970s that the Georgian and Victorian street pattern, scale and diversity of uses should be maintained or restored on the East side of Hampstead Road (the West side accepted as a lost cause) and that this is what local people and local voluntary sector organisations have always wanted.

The 1978 Tolmers People's Plan demonstrated how this could work in urban design terms. This is the plan that should have been adopted by Camden Council in the 1970s and 1980s and it was folly that it was not. The Tolmers People's Plan can be viewed here:

https://tolmers.net/wp-content/uploads/2026/02/TOLMERS_PEOPLES_PLAN_finallo.pdf

The general principles in the Tolmers People's plan are still relevant today and should be used to guide the form and location of new development at the southern end of the Tolmers Village area. The existing (new) Square should be protected and enhanced. It provides a quiet green space which people living there like. If and when the buildings forming the Square reach the end of their life it may well be that people at that time will

want to rebuild the original Square (like other places demolished due to human folly) and this possibility should be allowed for in planning policy.

At the same time Camden Council's adopted strategy for the wider Tolmers Village area, authored and designed by architects Renton Howard Wood Levin in the 1970s, should be respected and built on. The details and evolution of this scheme can be seen on the urban design page of tolmers.net here:

https://tolmers.net/urban-design/

The Euston Area Plan needs to pay more regard for the area's history and its current inhabitants.

Consultation flawed

Despite Camden Council claiming to have consulted local residents and businesses over the last 2 years, the new Euston Area Plan, which will permit the demolition of 250 Euston Road and the Euston Hotel and new buildings of up to 23 stories on their sites, only came to the attention of local residents at the beginning of February 2026.

This caused outrage and alarm to locals and it was agreed that a public meeting should be held. The public meeting took place on Wednesday 11th February 2026, attended by three Camden planners. A presentation was given to the meeting by Alice Brown, an architect, highlighting how the plan would affect Tolmers Square.

It became apparent at the meeting that the proposal to permit 23 storey buildings on the two sites was a recent addition to the plan. The planners were unable to confirm on what date the plan had been amended, despite the fact that three of the senior planners responsible for the plan from a team of five were present at the meeting.

It would appear that this crucial amendment which will inevitably result in the demolition of the mirrored building at 250 Euston Road and the Tolmers Square south side including trees, pub and green space, and the current Euston Hotel has not been highlighted or drawn to the attention of consultees or local residents.

The planners could not confirm when this new plan officially became 'public knowledge' but it is now part of the plan out for a Regulation 19 consultation. This process was due to end on 22nd February 2026 but the consultation has now been extended by one week to 2nd March 2026.

The objections to the plan we are lodging are therefore without prejudice to our contention that the consultation process is flawed and inadequate and that the whole plan should be re submitted for a new consultation under Regulation 18

The history of the plan is shown on this webpage with links to all previous consultation versions, including 2023 and 2024:
https://www.eustonareaplan.info/documents/

The three new site allocations (EA3, EA4 and EA5) were not included in the 2024 consultation on updates to the 2015 Plan, see https://www.eustonareaplan.info/wp-content/uploads/2024/07/EAP-Consultation-Booklet-July-24-1.pdf

Site Allocation EA3

July 2024: Did not include the Premier Inn building. Did not include the 40m height guidance.

Site Allocation EA4

EA4 of July 2024 did not cover the Euston Square Hotel, but the Euston Tower

Site Allocation EA5

EA5 of July 2024 did not include a 75m high residential tower or the 40m height guidance.

This consultation began in 2023 but the significant details that EA3 and EA4 would be permitted redevelopment to 75m were not included until late 2025 and were not drawn to the attention of consultees. The consultation is therefore flawed and should be restarted to give all residents and business affected the opportunity to comment.

On 19 February 2026 Patrick Allen of this firm wrote to Mr Burns of Camden Council and pointed out that the previous site allocations had not referred to these proposals.

In particular, Site Allocation EA3 in July 2024 did not include the Premier Inn building (Euston Hotel) nor 40m height guidance. Site Allocation EA4 in July 2004 did not cover the Euston Square Hotel but Euston Tower . Furthermore, Site Allocation EA5 of July 2024 did not include a 75m high residential tower or the 40m height guidance.

Mr Allen asked the following 3 pertinent questions:

1. What was the date when the plan amended to include each of these new permissions?
2. When was the amended plan sent out for consultation?
3. Did you draw attention to consultees that the plan had been amended to include these amendments. If not, why not?

We have received no answer to these questions and it is now clearly apparent that no consultation has taken place in respect of these two substantial towers.

Premature demolition

250 Euston Road is a high-quality and interesting building from the 1970s and has many years of useful life left. Euston Square Hotel is a heritage building which should not be lost. Demolition would involve massive disruption, pollution and noise for local residents and businesses who have already suffered enough.

Demolition of 250 Euston Road would result in the loss of at least part of Tolmers Square; a crucial, quiet, open space where residents can sit and children play. Securing this green space was a major achievement of local inhabitants and Camden planners in

the past. It is ironic that this is the second time locals have had to fight to preserve Tolmers Square in 50 years.

Refurbishment or retrofitting is much greener than demolition which results in unnecessary Greenhouse Gas emissions and ecological harm. See Embodied carbon factsheet produced by University College London:

Fact-sheet-embodied-carbon-social-housing.pdf

Buildings too high

The proposed towers are much too tall and will adversely affect the environment of the whole area, blocking out sunlight and creating wind turbulence. They will have an overbearing effect on Tolmers Square and peoples' homes. Their acceptance will also result in pressure to permit other high buildings in the area. Redevelopment with tall buildings is out of keeping with the low scale of the existing neighbourhood.

Whilst we accept that Camden has a housing waiting list which needs to be reduced, high rise towers facing the Euston Road are not the answer. They would be manifestly unsuitable for social housing with no open space or balconies and facing the noise and pollution of the Euston Road.

Furthermore, developers now only have to provide 20% of housing in new development for social needs in London, see: (https://www.bbc.co.uk/news/articles/cdrzgxj37d5o#:~:text=Affordable%20housing%20quota%20for%20London%20falls%20to%2020%25&text=The%20government%20and%20the%20mayor,from%2035%25%20to%2020%25).

So the contribution to the Camden waiting list from this development would be negligible and could not justify the demolition of existing buildings and the blight of existing social housing for some years during construction.

Disruption for residents and businesses

The last 5 years have been a nightmare for Tolmers residents and businesses. Proposals for terminating HS2 at Euston have blighted the area resulting in:

- Demolition of terraces in Euston Street and Melton Street with houses and small hotels;
- Demolition of a Victorian office on Starcross Street used for a while by the BR shop Collectors Corner;
- Destruction of the beautiful and historic St James Gardens (https://alondoninheritance.com/london-parks-and-gardens/st-james-gardens-a-casualty-of-hs2/);

- Demolition in 2025 of a small park and playground constructed on the Hampstead Road only one year earlier;
- Loss of the Ibis Hotel and The Bree Louise pub;
- Loss of Cardington Street/Melton Street which was a very convenient and quiet North South route for cyclists who now have to navigate a longer route via the pollution and traffic of the Euston Road;
- North Gower Street and Drummond Street being relentlessly and continuously dug up and blocked off for the re-routing of utilities.

HS2 were warned not to start demolition in the area without a plan for Euston station. There is still no plan but part of the area has been flattened, and the remaining businesses have suffered disruption and loss of revenue. Proposals in the Euston Area Plan will lead to more years of blight and disruption for residents and businesses which is unacceptable.

Harming the NHS

250 Euston Road is used by the National Health Service (NHS) in collaboration with University College Hospital across the road. It provides many community services. It is convenient and not too expensive and provides crucial car parking for midwives, district nurses and other travelling NHS staff. Staff can easily cross the road from 250 Euston Road to the hospital opposite and there is a constant flow of pedestrian traffic between the two.

Loss of 250 Euston Road would cause massive disruption to the NHS. All the services located there would have to find another home, probably more expensive and less convenient and probably without car parking.

Community History of Tolmers Square

The plan fails to consider the community history of the site and the epic struggle of the 1970s when local residents, politicians and businesses combined to overcome the plans of developers and ensure that the low rise, peaceful environment of Tolmers Square and surrounding streets was preserved and historic terraces renovated.

This is not just any old development site but a landmark to successful community action which shaped the area for years to come.

Although the historic Tolmers Square was not saved, the new square provided a quiet oasis for residents and their children, a green place to sit and play away from busy streets nearby. It should be preserved.

ENDS

Outlook

HS2 Ltd representations - EAP Update - Proposed Submission Draft 2026

From Damian Cox <[redacted]>
Date Tue 03/03/2026 15:56
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>
Cc Paul Gilfedder <[redacted]>; Mary-Ann Lewis <[redacted]>

1 attachment (260 KB)
20260303 HS2 Ltd reps - EAP Update 2026 - final.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 Euston Regeneration Team

Further to your consultation on the Euston Area Plan Update - Proposed Submission Draft 2026, please see attached representations submitted on behalf of HS2 Ltd.

Kind regards
Damian

Damian Cox | Town Planning Manager | Railway Directorate | HS2 Ltd
Tel: [redacted] Facebook | Twitter | LinkedIn | www.hs2.org.uk
High Speed Two (HS2) Limited, The Podium, 1 Eversholt Street, London NW1 2DN

R33

High Speed Two (HS2) Limited
1 Eversholt Street
London NW1 2DN

Telephone: 08081 434 434
Minicom: 08081 456 472
Email: hs2enquiries@hs2.org.uk
gov.uk/hs2

Euston Regeneration Team
Camden Town Hall
Judd Street
London
WC1H 8EQ

3 March 2026

By email: eustonareaplan@camden.gov.uk

Dear Euston Regeneration Team

Euston Area Plan Update – Proposed Submission Draft 2026

Further to the London Borough of Camden's consultation on the Euston Area Plan Update - Proposed Submission Draft 2026 ("EAP Update"), I would like to submit representations on behalf of High Speed Two (HS2) Ltd.

Representations

HS2 Ltd considers that the EAP Update is unsound as elements of Section 3.6 on open space strategy are not justified.

The concerns relate namely to the section titled ***'Re-provision of open space and biodiversity value lost as a result of HS2'*** on Pages 108/109, as the proposed text goes beyond the legal obligations of HS2 Ltd. The section should be re-drafted to accurately reflect the scope and limitations of commitments given to the LB Camden regarding the HS2 works in Euston.

HS2 Ltd, as nominated undertaker for HS2, is bound to comply with the HS2 Phase One Environmental Minimum Requirements (EMRs)[1], which includes the commitments contained in the HS2 Phase Register of Assurance and Undertakings[2]. Provisions and controls around subsequent design changes are outlined in HS2 Phase One Information Paper B1, Main Provisions of the Planning Regime[3] and HS2 Phase One Information Paper E1, Control of Environmental Effects[4].

The Secretary of State for Transport gave a range of assurances to LB Camden during the passage of the HS2 Phase One hybrid Bill. These assurances covered the provision of measures to mitigate the effects of the construction of HS2 and in connection with the permanent Euston station scheme.

While HS2 Ltd indicated in its assurance letter of February 2016 to LB Camden that it wanted to *"ensure that replacement and enhanced open space is at least equivalent to the open spaces to be*

[1] https://www.gov.uk/government/publications/environmental-minimum-requirements
[2] https://www.gov.uk/government/publications/high-speed-rail-london-west-midlands-bill-register-of-undertakings-and-assurances
[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672177/B1_-_Main_Provisions_of_the_Planning_Regime_v1.6.pdf
[4] https://assets.publishing.service.gov.uk/media/5a82e5cae5274a2e87dc386e/E1_-_Control_of_Environmental_Impacts_v1.7.pdf

High Speed Two (HS2) Limited, registered in England and Wales.
Registered office: Two Snowhill, Snow Hill Queensway, Birmingham B4 6GA. Company registration number: 06791686. VAT registration number: 181 4312 30.

lost in terms of quantity and quality, and is in a suitable location", this was a non-binding statement of intent.

The relevant permanent replacement open space assurance provided to LB Camden by HS2 Ltd, on behalf of the Secretary of State, states:

> "*The Promoter will require the Nominated Undertaker to actively engage with LB Camden to ensure the provision of high quality permanent replacement open space and play space within the design for the authorised works in LB Camden in so far as is reasonably practicable within the limits of the Bill and without impacting the timely and economic delivery of the railway."* (Assurance no. 1137)

Assurance no. 1137 does not commit the Secretary of State to provide replacement open space as laid out in page 109 of the EAP Update, which states that: "*Replacement open space must be at least equivalent to the open spaces to be lost in terms of quantity, quality and location; and should be on or around Euston Station site; at least equivalent floor area to Environmental Statement provision; and at-grade, accessible, with appropriate landscaping."*

Furthermore, the detail of Assurance no. 1137 is not fully reflected in the draft EAP update as the following limitations are not recognised:

a) within the design for the authorised works in LB Camden;

b) in so far as is reasonably practicable within the limits of the Bill;

c) without impacting the timely and economic delivery of the railway.

Since the former government paused the majority of HS2 works at Euston in March 2023 due to affordability challenges, at the request of the Department for Transport, work has been ongoing to establish a more affordable HS2 Euston station. Recent work undertaken by the Euston Partnership to develop the Euston Spatial Scope Plan (SSP) has involved LB Camden. In the latest version of the SSP, the space above the tracks to the north of the station - indicated in the HS2 Phase One Environmental Statement (Additional Provision 3)[5] - is no longer proposed as part of the HS2 Euston scheme.

While regrettable, the removal of the deck that previously would have enabled replacement open space, alongside a northern station entrance and taxi facility, will result in a more affordable station design. This change is considered by HS2 Ltd to comply with the limitations outlined in the Assurance given the savings on capital cost.

Request for modifications

Modifications sought to the EAP Update in order to make it sound are summarised below.

1. The scope and limitations of the commitment given by the Secretary of State on replacement open space in Assurance no. 1137 should be accurately reflected.
2. Given the limitations contained within Assurance no. 1137, the proposed sentence that suggests an alternative location for the open space above the tracks would need to be found should be removed given the design changes to Euston station that have been necessary to enable a more affordable station design.

[5] https://www.gov.uk/government/publications/ses2-and-ap3-es-september-2015-volume-2-community-forum-area-reports-and-map-books

HS2 Ltd's suggested amendments to the open space strategy (Section 3.6) on Pages 108/109 are outlined as follows (proposed text underlined in green; removed text in ~~purple~~):

"Re-provision of open space and biodiversity value lost as a result of HS2

The re-provision of open space, biodiversity, habitat provision, sports, play and recreation facilities, monuments/statues and other features lost as a result of HS2 at St James's Gardens (a Site of Importance for Nature Conservation), Euston Square Gardens and Hampstead Road open space is covered by the HS2 Phase One Environmental Minimum Requirements (EMRs). Through their EMRs, the Secretary of State has committed to mitigate the effects of the HS2 scheme including the re-provision of open space. Through the EMRs, the Secretary of State stated his intent that the effects of the scheme will not exceed those reported in the Environmental Statement that accompanied the Bill and gave a range of commitments including ones related to the mitigation of impacts on open space and community facilities.

~~The Council considers that the levels of open space re-provision shown in the Environmental Statement (ES) accompanying the HS2 Act (and subsequent updates) should be the minimum quantum of open space that can be provided by HS2 as mitigation. As part of the assurances provided to the Council,~~ Although HS2 Ltd states that its aims are to ensure that replacement and enhanced open space is at least equivalent to the open spaces to be lost in terms of quantity and quality, and is in a suitable location, the commitment provided by the Secretary of State requires HS2 Ltd to "actively engage with the London Borough of Camden to ensure the provision of high quality permanent replacement open space and play space within the design for the authorised works in the London Borough of Camden in so far as is reasonably practicable within the limits of the Bill and without impacting the timely and economic delivery of the railway." . ~~At the time of the schedule 17 submission for the station, it will be important to understand how HS2 propose to mitigate, in perpetuity, the open space lost to the scheme.~~ The Council's expectation is that ~~R~~replacement open space should be provided as close to the original location as possible and at grade, accessible, with appropriate landscaping.

The ES showed the bulk of the replacement open space being provided in an area to the north of the station, on newly created "land" above the railway tracks. These northern gardens, along with additional open space on the edge of railway land at Regents Park Estate and a pocket of open space close to the site of the Former National Temperance Hospital, combine to largely make up for the amount of open space lost at St James' Gardens. The ES also outlined the re-instatement of Euston Square Gardens following its use as a construction compound.

Following subsequent design development and the need to find a more affordable HS2 station design, it is understood that the open space proposed in the area to the north of the station, on newly created land above the railway tracks is no longer part of the HS2~~'s~~ proposals~~. An alternative location for re-provided open space will need to be found, notwithstanding the reduction in available space and the Government's change in approach to funding the station at Euston.~~ The site wide open space strategy should look to accommodate as much open space as is feasible in the context of the spaces lost, the commitments made by the Secretary of State, and site constraints, after which alternative locations will need to be explored. Indicative locations for open spaces are shown on Figure 3.12. Open Space network illustration and further detail is provided in Chapter 4, Places.

Mitigation for the open spaces lost is considered to be a key strategic priority in planning for future open space provision in the area, and should be calculated separately to any requirements for open space and biodiversity provision generated by new development and replacement housing which should be delivered in line with Development Plan policies. Any requirements for open space and biodiversity provision generated by new development should be considered holistically alongside any HS2 Act mitigation requirements to provide open space to contribute toward the objectives of the EAP.

~~*Replacement open space must be at least equivalent to the open spaces to be lost in terms of quantity, quality and location and:*~~

- ~~*Should be on or around Euston Station site;*~~
- ~~*At least equivalent floor area to Environmental Statement provision; and*~~
- ~~*At-grade, accessible, with appropriate landscaping.*~~

To help mitigate the temporary loss of open space associated with the construction of HS2, support will be given to the positive use of any vacant spaces for temporary open space uses, such as food growing/ allotments, play space and temporary public open space."

As modifications are sought, it is considered necessary for HS2 Ltd to participate at the oral part of the examination. The EAP Update consultation draft sets unreasonable expectations on the provision of replacement permanent open space in connection with the HS2 scheme. HS2 Ltd would like the opportunity to clarify the legal obligations and limitations.

Yours faithfully

[redacted]

Paul Gilfedder
Head of Town Planning, HS2 Ltd

R34

Outlook

RE: Euston AreaPlan update-Proposed Submission Draft 2026 Representation Form

From Iande kunrunmi [redacted]
Date Tue 03/03/2026 00:28
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

1 attachment (11 MB)
Scanned Document 03-03-2026 at 12.20.49 am.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,

Please, find the attached,

Kind regards,

Olamide Kunrunmi,

[redacted]

[redacted]

[redacted]

R34

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 22 February 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	MS.	
First Name	OLAMIDE	
Last Name	KUNRUNMI.	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1*	[redacted]	
Address Line 2		
*Post Town**		
*Post Code**		
Telephone No.		
E-mail Address		

834

Euston Area Plan Update – Proposed Submission Draft 2025 - 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
- Policies map

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	✓

R34

...on 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.

(1) My real reasons for totally objecting to the EUSTON AREA PLAN, across the EUSTON SQUARE HOTEL & 250 EUSTON RD The buildings have been selected for demolition and redevelopment without due consideration of the local Community or any of the historic neighbourhood, Once listed in the Site allocation, a Subsequent Planning application is not refused.

(2) I object to these buildings to be demolished at all.
Euston square Hotel is a heritage building which should not be lost 250 Euston Road is a high-quality building from the 1970s which of course should be retained. The use of

(3) Demolition & rebuilding with cause unacceptable pollution & total disruption to our community. Think of the Greenhouse gas emissions and ecological harm.

(4) 250 EUSTON Road, should remain for the NHS purposes. towers every important to UCH hospital

(Continue on a separate sheet if necessary)

R34

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

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.

No to Tower
Refit instead of demolish.
Existing buildings height to be preserved.
To protect the Cultural integrity of Tolmer Square and my Neighbourhood Street – North Gower St

(Continue on a separate sheet if necessary)

R34

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:

Obviously to get our voices 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.*

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

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:**	01/3/2026.

R35

Planning Consultants

DP9

[redacted]

DP9 Ltd

[redacted]

3rd March 2026

Euston Regeneration
5 Pancras Square
London
N1C 4AG

By email to eustonareaplan@camden.gov.uk

To whom it may concern,

EUSTON AREA PLAN UPDATE (REGULATION 19) CONSULTATION
REPRESENTATIONS BY LENDLEASE AND THE EUSTON LANDOWNERS

1.0 Introduction

1.1 On behalf of Lendlease (our client and the Master Development Partner for Euston) and the Euston Landowners, we are writing to submit representations on the draft Euston Area Plan Update (Reg. 19 version) published on 9th January 2026 (hereafter referred to as 'the EAP Update').

1.2 These representations follow those which we submitted on behalf of Lendlease and the Euston Landowners on 17th February 2023 (Reg. 18 consultation) and on 6th September 2024 (additional Reg. 18 consultation). It is worth highlighting that this Reg. 19 consultation is the first time we have had sight over both the full draft EAP Update and all evidence base documents, to be able to understand the holistic approach.

1.3 Lendlease and the Euston Landowners have been engaged in long-running discussions with the Local Planning Authority (hereafter 'the LPA') in relation to the comprehensive redevelopment of Euston to deliver new homes, employment space, retail, leisure, cultural and community facilities (hereafter 'the Masterplan').

1.4 As key stakeholders, Lendlease and the Euston Landowners welcome the opportunity to be involved in the preparation of the EAP Update, particularly given the crucial importance of the Masterplan to achieving the vision and objectives set out in the EAP.

1.5 The National Planning Policy Framework ('NPPF') (December 2024) at para. 36 explains that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are sound if they are:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other

authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

1.6 We note that a draft consultation NPPF has been published and, given its early stage, we do not make reference to it when discussing soundness.

1.7 We appreciate the collaboration that has taken place between the LPA and Lendlease and the Euston Landowners to date. There have been several positive changes to the Plan since Reg. 18 stage. In this respect, we are pleased to see the progress in the EAP Update on the following subjects:

- **Land Use** – we welcome the changes incorporated, better enabling the need for flexibility regarding expectations for land uses across the Plan area.
- **Design** – we welcome the wording updates to align with NPPF and London Plan policy expectations, and the wording changes regarding approach to building heights/massing/scale, which makes clear the indicative nature of heights stated within the EAP Update.
- **Euston Station and Tracks Character Area** – we support the wording changes to remove maximum caps for homes, plus the supporting text regarding capacity that builds in flexibility by referencing wider considerations as part of complex station redevelopment.
- **Camden Cuttings Character Area** – we similarly support the wording changes to remove maximum caps for homes and jobs, and the wording to acknowledge the indicative heights which aligns with the design chapter.
- **Delivery, Planning Benefits and Monitoring** – we support the amendments that have been made so far in this chapter, but feel more is needed to align the chapter more accurately to the findings of the viability evidence base, as set out later in these representations.

1.8 In light of the above, we support many aspects of the EAP Update and consider it is greatly improved compared to previous draft versions.

1.9 However, despite the positive progress made with the LPA, the remainder of these representations explain our ongoing concerns on the following matters. These are crucially significant to the overall deliverability and effectiveness of the EAP Update.

- 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.

1.10 As it stands, notwithstanding the general positive progress made in many respects, the above points mean we do not consider that the EAP Update can be considered sound, as the Plan is not positively prepared, justified, and/or effective.

1.11 In summary, we think there is a flawed relationship between the EAP Update and Local Plan, and that the EAP Update has not been sufficiently or appropriately informed by the evidence base specific to the EAP, meaning, for example, that unjustified affordable housing and workspace requirements are imposed.

1.12 We do not consider the EAP Update to be **positively prepared** because it does not seek to meet the area's objectively assessed needs when it has not taken proper account of the development circumstances for the area and development it is to cover. For similar reasons, it cannot be **justified** due to the absence of proportionate evidence. Finally, the EAP Update is not **effective** because proper regard has not been had to whether the Euston development is deliverable if general (Local Plan) policies are applied without regard to viability.

1.13 A separate issue is that the EAP Update includes unjustified asks in relation to HS2 replacement open space.

1.14 These matters are explained below.

2.0 Relationship between the EAP Update and the emerging Local Plan

2.1 There are various parts of the EAP Update and the emerging Local Plan that seek to describe the relationship between the two documents. One visual example of where there is inconsistency in the way the interaction is explained is at Figure 1.1 of the EAP Update: 'Euston Area Plan policy framework' shows the EAP as a Development Plan document with comparable status to the Local Plan (and this is also how it is shown in the current Local Plan (2017). This can be compared to Figure 01: 'Camden Planning Document Hierarchy' of the emerging Local Plan also shows the EAP Update as a Development Plan document, although it presents the status in a visually different way intimating it is subservient. This confusion and inconsistency is carried through into the documents where it is clear from the draft Local Plan that, when it comes to the detailed policy consideration for the Euston Area, that will sit in the EAP Update.

2.2 There is currently no dedicated document as part of the EAP Update evidence base which describes the relationship between the EAP Update and the emerging Local Plan. However, we do note the Euston Area Plan Topic Paper (October 2025) published as part of the emerging Local Plan Examination in Public[1].

2.3 This Topic Paper highlights some key points regarding the relationship between the EAP Update and the emerging Local Plan (our emphasis is underlined):

[1] tp02_euston-area-plan-topic-paper

- 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.[2]

2.4 The key takeaway from the above is that the EAP Update and the emerging Local Plan are underpinned by a different viability evidence base. The emerging Local Plan does not consider the viability of the area covered by the EAP. The Masterplan area has been subject to a specific viability evidence base document entitled Euston Area Plan Viability Assessment, January 2026, authored by 31ten Consulting[3] (hereafter 'the EAP Update Viability Assessment'). The EAP Update Viability Assessment focuses on the sites that form part of the Masterplan area as shown in Figure 2.1 within that document, which is contiguous with the EAP Update 'places' called 'Euston Station and Tracks' and 'Camden Cutting'. The Council commissioned this discreet viability work for the Euston area in the knowledge that the Local Plan viability work was not able to appropriately test the extraordinary costs associated with the sites associated with the station and in turn it is not unexpected that once this assessment has been concluded that it supports a different policy approach to the Local Plan.

2.5 The viability results set out at para. 8.4. of the EAP Update Viability Assessment identify that none of the Masterplan sites would be viable at 50% affordable housing and 20% affordable workspace (i.e. these sites are not viable at the level expressed in the emerging Local Plan

[2] We are concerned that the Topic Paper implies that it is only the Camden Cutting and Euston Tracks areas that are affected by extraordinary costs. The EAP must enable for future masterplan development proposals to be considered holistically irrespective of whether there is transport interface/extraordinary costs in any individual area or not.

[3] 019-Draft-Euston-Area-Plan-Viability-Report-9th-January-2026.pdf

policies H4 and IE4). The viability assessment confirms that reductions in the policy expectations are required for both affordable housing and affordable workspace compared to the borough wide policies and furthermore that this would also need to benefit from higher densities, additional value growth through placemaking, additional funding and/or grant. In view of the challenging viability reported for those sites with enabling costs linked to the station, tracks areas and cuttings, these sites can, at best, provide just a limited contribution towards affordable housing and/or affordable workspace – certainly not the levels in the emerging Local Plan.

2.6 It is a concern that, despite the conclusions of the viability assessment specifically intended to support the EAP and recognising the extraordinary circumstances associated with the sites which form much of this area, this has not translated into area specific policies. Furthermore, it would be inappropriate to rely on increasing floorspace as a 'fix' to drive more value given the wider constraints and the viability assessment already directs that floorspace needs to be optimised to support deliverability of these challenging sites before borough wide policy asks for affordable housing and affordable workspace are applied. As it stands, the EAP Update does not reflect the fact that the EAP Update Viability Assessment demonstrates that the Local Plan policies are unviable within the Masterplan area.

2.7 Conversely the EAP Update references the emerging Local Plan, and seeks to apply Local Plan policies to the Masterplan area, as evident in:

- Strategic Principle EAP1, Part B 'Homes', where it says that "*the Council will negotiate to seek the maximum reasonable amount of good quality, genuinely affordable housing in accordance with Local Plan and London Plan policy";* and
- Strategic Principle EAP1, Part C 'Economy and Employment' where it says that "*new employment floorspace should include a suitable mix of workspace types, including office, lab space, business accelerators, start-up, incubator, and move-on spaces, as well as an appropriate amount of affordable workspace in line with Camden's affordable workspace strategy and Local Plan policies"* (our emphasis, underlined).

2.8 The EAP Update policy wording for Development Principle EAP1 'Euston Station and Tracks' and the Site Allocation for the 'Euston Station and Tracks' (EA1) do not contain bespoke policies on affordable housing or affordable workspace reflecting the findings of the EAP Update Viability Assessment. Similarly, the EAP Update policy wording for Development Principle EAP3 'Camden Cutting' and the Site Allocations within this (Cutting at Park Village East (EA6), Granby Terrace Bridge/Hampstead Road (EA7) and Cutting at Mornington Terrace (EA8)) do not contain bespoke policies on affordable housing or affordable workspace in line with the findings of the EAP Update Viability Assessment. The evidence demonstrates that the none of these sites are able to viably deliver the borough wide policy asks and the policy should be amended appropriately.

2.9 We do acknowledge that the supporting text to Development Principles EAP1 and EAP3 contains some wording regarding viability. We also acknowledge the same in Chapter 5 of the EAP Update entitled 'Delivery, Phasing, Planning Benefits and Monitoring'. To summarise, these references highlight the cost challenges associated with a deck to support development above parts of the HS2 and NR stations and tracks and the flexibility that may be appropriate in the application of policy targets. Nevertheless given the findings of the EAP viability

assessment, it is clear that whilst accurately establishing enabling costs for the Masterplan requires further design work to be carried out. Similarly for the costs associated with railway infrastructure at the time of preparing the EAP Update, there is no reasonable prospect of the of the viability improving to where the borough wide policy asks will for these sites be viable, and as such the ask should be appropriately adjusted at the policy making stage.

2.10 The broad explanations given to the viability situation noted above do not present a complete and considered position with respect to how key policies within the EAP Update have been set out. The LPA needs to take a fundamentally different approach and better reflect the EAP Update Viability Assessment in the EAP Update itself, given the EAP specific viability evidence clearly demonstrates that the emerging Local Plan policies cannot be met. The viability evidence clearly demonstrates that the viability situation is highly complex and extraordinary. The LPA needs to turn its mind to this and consider specific and bespoke policies for the Euston area, as distinct from the emerging Local Plan.

2.11 The EAP should be a self-contained Development Plan, and if it is to be genuinely self-contained then unique viability challenges for the Masterplan have to be recognised in the EAP document, with bespoke policies applied. The Euston Area Plan (2015) was defined in the Local Plan (2017) as a "single strategic plan" and we consider that this principle should be carried through to the EAP Update. That is, a member of the public should be able to read the EAP and be clear from that plan as to the policy expectations rather than be referred to other documents.

2.12 The LPA has gathered sufficient information through the EAP Update Viability Assessment to turn their mind to bespoke policies for the Masterplan area, including recognition that a different percentage threshold should apply for affordable housing and affordable workspace (compared to that stated in the Local Plan). The bespoke policy could feature in Strategic Principle EAP1, Development Principles EAP1 and EAP3, and/or Site Allocations EA1, EA6, EA7 and EA8. The references to the emerging Local Plan as determining the level of affordable housing and affordable workspace must be removed.

2.13 Perversely, should the references and linkage with the emerging Local Plan not be removed from the EAP Update, it means that further progress on the EAP is premature and needs to await the outcome of the emerging Local Plan examination process because the draft EAP is relying on and referring to a not-yet-adopted Local Plan that will likely be the subject of further modification as part of the examination process. It also means the Local Plan examination process would be contaminated by a prematurity argument where matters of viability (as it relates to affordable housing and affordable workspace policies) needs to be addressed and examined for the Euston area. We do not believe this has ever been the intention. Stakeholders and consultees at large, taking part in the emerging Local Plan process, have assumed the detailed policies for affordable housing, affordable workspace and associated viability evidence base at Euston will be prepared and examined as part of the EAP Update and not the emerging Local Plan.

2.14 We would like to work with the LPA from this point forward through to the Examination in Public on the EAP Update to agree necessary modifications to the EAP in relation to affordable housing and affordable workspace for the Masterplan area, delinking it from the emerging Local Plan. Alongside the consideration of modifications, we think it would be sensible to

prepare a Statement of Common Ground. This would pick up key areas of agreement and disagreement in relation to the content of the EAP Update itself as well as in relation to relevant evidence base documents (notably the 31ten Viability Assessment where there continue to be areas of concern relating to certain viability inputs and assumptions).

2.15 In addition, we also think there must be modifications made to the emerging Local Plan (through its Examination in Public) to more clearly explain its relationship with the EAP (this is something we will be responding to as part of the emerging Local Plan submission of Matters Statements ahead of the associated 13th March 2026 deadline).

3.0 HS2 Replacement Open Space

3.1 High Speed Two ('HS2') Ltd has submitted its own representations to this consultation on the matter of the HS2 replacement open space in the EAP. These representations are supported by Lendlease and the Euston Landowners.

3.2 As HS2 Ltd describe in their representations, Lendlease and the Euston Landowners, consider that the EAP Update is unsound as elements of Section 3.6 on open space strategy are not justified.

3.3 The concerns relate namely to the section titled *'Re-provision of open space and biodiversity value lost as a result of HS2'* on Pages 108/109, as the proposed text goes beyond the legal obligations of HS2 Ltd. The section should be re-drafted to accurately reflect the scope and limitations of commitments given to the Camden regarding the HS2 works in Euston.

3.4 HS2 Ltd is bound to comply with the HS2 Phase One Environmental Minimum Requirements (EMRs)[4], which includes the commitments contained in the HS2 Phase Register of Assurance and Undertakings[5].

3.5 The Secretary of State for Transport gave a range of assurances to LB Camden during the passage of the HS2 Phase One hybrid Bill. These assurances covered the provision of measures to mitigate the effects of the construction of HS2 and in connection with the permanent Euston station scheme. Provisions and controls around subsequent design changes are outlined in HS2 Phase One Information Paper B1, Main Provisions of the Planning Regime[6] and HS2 Phase One Information Paper E1, Control of Environmental Effects[7].

3.6 While HS2 Ltd indicated in its assurance letter of February 2016 to LB Camden that it wanted to *"ensure that replacement and enhanced open space is at least equivalent to the open spaces to be lost in terms of quantity and quality, and is in a suitable location"*, this was a non-binding statement of intent.

[4] https://www.gov.uk/government/publications/environmental-minimum-requirements
[5] https://www.gov.uk/government/publications/high-speed-rail-london-west-midlands-bill-register-of-undertakings-and-assurances
[6] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672177/B1_-_Main_Provisions_of_the_Planning_Regime_v1.6.pdf
[7] https://assets.publishing.service.gov.uk/media/5a82e5cae5274a2e87dc386e/E1_-_Control_of_Environmental_Impacts_v1.7.pdf

3.7 The relevant permanent open space assurance provided to LB Camden by HS2 Ltd, on behalf of the Secretary of State, states:

> "*The Promoter will require the Nominated Undertaker to actively engage with LB Camden to ensure the provision of high quality permanent replacement open space and play space within the design for the authorised works in LB Camden in so far as is reasonably practicable within the limits of the Bill and without impacting the timely and economic delivery of the railway."* (Assurance no. 1137)

3.8 Assurance no. 1137 does not commit the Secretary of State to provide replacement open space as laid out in page 109 of the EAP Update, which states that: "*Replacement open space must be at least equivalent to the open spaces to be lost in terms of quantity, quality and location; and should be on or around Euston Station site; at least equivalent floor area to Environmental Statement provision; and at-grade, accessible, with appropriate landscaping."*

3.9 Furthermore, the detail of Assurance no. 1137 is not fully reflected in the draft EAP update as the following limitations are not recognised:

- within the design for the authorised works in LB Camden.
- in so far as is reasonably practicable within the limits of the Bill.
- without impacting the timely and economic delivery of the railway.

3.10 Since the former government paused the majority of HS2 works at Euston in March 2023 due to affordability challenges, work has been ongoing to establish a more affordable HS2 Euston station. Through recent design development, the space above the tracks to the north of the station – indicated in the HS2 Phase One Environmental Statement (Additional Provision 3)[8] – is no longer proposed as part of the HS2 Euston scheme.

3.11 While regrettable, the removal of the deck that previously would have enabled replacement open space, alongside a northern station entrance and taxi facility, will result in a more affordable station design. This change is considered by HS2 Ltd to comply with the limitations outlined in the Assurance given the savings on capital cost.

<u>HS2 Replacement Open Space – Request for modifications</u>

3.12 Modifications sought to the EAP Update in order to make it sound are summarised below:

- The scope and limitations of the commitment given by the Secretary of State on replacement open space in Assurance no. 1137 should be accurately reflected.
- Given the limitations contained within Assurance no. 1137, the proposed text that suggests an alternative location for the open space above the tracks would need to be found should be removed given the design changes to Euston station that have been necessary to enable a more affordable station design.

3.13 The suggested amendments to the open space strategy (Section 3.6) on Pages 108/109 are outlined below.

[8] https://www.gov.uk/government/publications/ses2-and-ap3-es-september-2015-volume-2-community-forum-area-reports-and-map-books

3.14 HS2 Ltd's suggested amendments to the open space strategy (Section 3.6) on Pages 108/109 are outlined as follows (proposed text underlined in green; removed text in ~~purple~~). These amendments are supported by Lendlease and the Euston Landowners:

"Re-provision of open space and biodiversity value lost as a result of HS2

The re-provision of open space, biodiversity, habitat provision, sports, play and recreation facilities, monuments/statues and other features lost as a result of HS2 at St James's Gardens (a Site of Importance for Nature Conservation), Euston Square Gardens and Hampstead Road open space is covered by the HS2 Phase One Environmental Minimum Requirements (EMRs). Through their EMRs, the Secretary of State has committed to mitigate the effects of the HS2 scheme including the re-provision of open space. Through the EMRs, the Secretary of State stated his intent that the effects of the scheme will not exceed those reported in the Environmental Statement that accompanied the Bill and gave a range of commitments including ones related to the mitigation of impacts on open space and community facilities.

~~The Council considers that the levels of open space re-provision shown in the Environmental Statement (ES) accompanying the HS2 Act (and subsequent updates) should be the minimum quantum of open space that can be provided by HS2 as mitigation. As part of the assurances provided to the Council,~~ Although HS2 Ltd states that its aims are to ensure that replacement and enhanced open space is at least equivalent to the open spaces to be lost in terms of quantity and quality, and is in a suitable location, the commitment provided by the Secretary of State requires HS2 Ltd to "actively engage with the London Borough of Camden to ensure the provision of high quality permanent replacement open space and play space within the design for the authorised works in the London Borough of Camden in so far as is reasonably practicable within the limits of the Bill and without impacting the timely and economic delivery of the railway." . ~~At the time of the schedule 17 submission for the station, it will be important to understand how HS2 propose to mitigate, in perpetuity, the open space lost to the scheme.~~ The Council's expectation is that ~~R~~replacement open space should be provided as close to the original location as possible and at grade, accessible, with appropriate landscaping.

The ES showed the bulk of the replacement open space being provided in an area to the north of the station, on newly created "land" above the railway tracks. These northern gardens, along with additional open space on the edge of railway land at Regents Park Estate and a pocket of open space close to the site of the Former National Temperance Hospital, combine to largely make up for the amount of open space lost at St James' Gardens. The ES also outlined the re-instatement of Euston Square Gardens following its use as a construction compound.

Following subsequent design development and the need to find a more affordable HS2 station design, it is understood that the open space proposed in the area to the north of the station, on newly created land above the railway tracks is no longer part of the HS2~~'s~~ proposals~~. An alternative location for re-provided open space will need to be found, notwithstanding the reduction in available space and the Government's change~~

~~in approach to funding the station at Euston.~~ The site wide open space strategy should look to accommodate as much open space as is feasible in the context of the spaces lost, the commitments made by the Secretary of State, and site constraints, after which alternative locations will need to be explored. Indicative locations for open spaces are shown on Figure 3.12. Open Space network illustration and further detail is provided in Chapter 4, Places.

Mitigation for the open spaces lost is considered to be a key strategic priority in planning for future open space provision in the area, and should be calculated separately to any requirements for open space and biodiversity provision generated by new development and replacement housing which should be delivered in line with Development Plan policies. Any requirements for open space and biodiversity provision generated by new development should be considered holistically alongside any HS2 Act mitigation requirements to provide open space to contribute toward the objectives of the EAP.

~~Replacement open space must be at least equivalent to the open spaces to be lost in terms of quantity, quality and location and:~~

- *~~Should be on or around Euston Station site;~~*
- *~~At least equivalent floor area to Environmental Statement provision; and~~*
- *~~At grade, accessible, with appropriate landscaping.~~*

To help mitigate the temporary loss of open space associated with the construction of HS2, support will be given to the positive use of any vacant spaces for temporary open space uses, such as food growing/ allotments, play space and temporary public open space."

4.0 Conclusion

Flawed relationship between the EAP and the Local Plan

4.1 We consider that the EAP Update, in its current form, is not positively prepared, justified, and/or effective and it therefore fails to meet the test of soundness. The document requires modification.

4.2 The EAP Update as currently drafted has a flawed relationship between the EAP Update and the emerging Local Plan. The EAP Update has not been properly informed by the specific viability evidence base for the Masterplan area. This clearly demonstrates that the emerging Local Plan policies are not viable in the Masterplan area. For this reason, the LPA must turn its mind to affordable housing and affordable workspace policies that are bespoke for the Masterplan area, and specify Euston specific policies affordable housing and affordable workspace. It is inappropriate for the LPA to simply cross refer to the emerging Local Plan and the viability negotiations which may take place pursuant to policies H4 and IE4 as this approach risks delivery and sets unjustified expectations as the starting point. It would also mean that the EAP Update is being prematurely progressed.

4.3 The LPA's EAP Topic Paper, referred to above, as well as statements in the draft Local Plan give the clear impression that policy detail for the Euston Area will sit in the EAP Update.

However, as identified above, the EAP Update is currently acting in a supplementary and subservient fashion to the Local Plan, and applying general draft Local Plan policy. This is contrary to the clear intention for the EAP Update to be a Development Plan Document in its own right, and one which contains a more detailed policy framework for Euston, as described in the Euston Area Plan Topic Paper. Were the EAP Update to be reliant upon policies within the emerging Local Plan it means that Euston specific viability, affordable housing, affordable workspace, and no doubt other policy matters, must be examined through the emerging Local Plan examination process.

4.4 The above gives rise to a wider concern about the Examination in Public for the emerging Local Plan. This was never intended to be an examination into policies that will apply to the Masterplan area, and as such, Lendlease and the Euston Landowners (as well as other stakeholders) have concerns about how to address the upcoming Local Plan Examination. A discussion with Camden officers about the approach in this respect is necessary.

4.5 We request the LPA to modify the EAP Update in line with our comments made in these representations and, importantly, delink it from the emerging Local Plan. We will work collaboratively and positively with Camden officers to agree modifications and also a Statement of Common Ground.

HS2 replacement open space

4.6 HS2 Ltd has submitted its own representations to this consultation on the matter of the HS2 replacement open space in the EAP. These representations are supported by Lendlease and the Euston Landowners. As HS2 Ltd describe in their representations, Lendlease and the Euston Landowners, consider that the EAP Update is unsound as elements of Section 3.6 on open space strategy are not justified. The approach to reprovision of open space on Pages 108/109 of the EAP updated should be re-drafted to accurately reflect the scope and limitations of commitments given to the Camden regarding the HS2 works in Euston. Proposed modifications have been put forward.

Yours faithfully

[redacted]

DP9 Ltd.

R35

Outlook

Euston Area Plan Reg 19 Consultation Response

From Craig Tabb <[redacted]
Date Tue 03/03/2026 18:57
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>
Cc Mary-Ann Lewis <[redacted] Therese Gallagher [redacted]

1 attachment (881 KB)
EAP Reg 19 Consultation Response - Final 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.

Please find attached response to the Euston Area Plan Reg 19 consultation on behalf of Lendlease (the Master Development Partner for Euston) and the Euston Landowners.

We look forward to discussing the content of the response with you and would like to diarise a meeting in this respect.

Kind regards,

Craig Tabb
[redacted]

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