Rachel English

From: Andrea Williams [redacted]
Sent: 03 March 2026 21:24
To: EustonAreaPlan
Cc: Olivia Marshall
Subject: London Property Alliance response to draft Euston Area Plan
Attachments: London Propeerty Alliance response to the Euston Area Plan consultation.pdf

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Dear Euston Regeneration Team,

We hope you are well. Please find the attached submission to your consultation on the draft Euston Area Plan. We would be keen to discus elements of this response in more depth and very happy to answer any questions you may have.

Kind regards

Andrea

Andrea Williams | Policy & Communications Director

London Property Alliance
City Property Association | Westminster Property Association
Office. [redacted]

London Property Alliance | citypropertyassociation.com | westminsterpropertyassociation.com | londonpropertyalliance.com

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London Property Alliance
WPA | CPA

Euston Regeneration Team
5 Pancras Square
London
N1C 4AG

By email only: eustonareaplan@camden.gov.uk

3 March 2026

Dear Sir/Madam,

London Property Alliance representation to the Euston Area Plan Proposed Submission Draft

I am writing on behalf of the London Property Alliance ("LPA") to respond to the consultation on the proposed draft of the Euston Area Plan ("the Plan").

The LPA is a not-for-profit membership body and advocacy group representing over 300 leading real estate owners, investors, professional advisors and developers operating across central London. Our members are significant investors in commercial development, including in Camden, London's third-largest office market.

The full list of our members from across our sister membership organisations which comprise the LPA can be found here and here.

We strongly support the ambition of the Euston Area Plan to deliver a coordinated, high-quality regeneration of Euston as a major transport, commercial and employment hub of national importance. Our members are committed to taking a central role in delivering new commercial space – particularly high-quality offices, infrastructure and public realm, and consider the regeneration of Euston and the delivery of this space essential to unlocking London's full growth potential.

Offices are the engine room of London's economy. Our latest research with Knight Frank, *Space for Change: Office space dynamics in central London*, shows that **office-based sectors support around 2.8 million jobs** across Greater London **and generate £290bn in GVA** annually – nearly half of the capital's economic output. Every 100 office jobs support roughly 40 supply chain jobs and 18 high street jobs.[1]

The transformational change envisaged by the Plan cannot be achieved without a strong pipeline of high-quality office and laboratory floorspace capable of accommodating the next generation of talent, boosting productivity, fostering innovation and supporting Camden's key growth sectors, particularly within its Central Activities Zone (CAZ) and the Knowledge Quarter.

[1] ***Space for Change: Office space dynamics in central London***, London Property Alliance/Knight Frank, 2025.

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Development at Euston is central to this ambition and represents a nationally significant opportunity to enhance the UK's global competitiveness in research and innovation.

Major infrastructure investment at Euston can also act as a catalyst for wider economic growth. LPA research into the impact of the Elizabeth line demonstrates how improved transport infrastructure can stimulate substantial investment and job creation. The line has supported almost 200,000 new office jobs, 171 hotels, 2,666 food and beverage outlets and 12 museums across London[2]. The regeneration of Euston has the potential to unlock similar long-term benefits.

Despite the essential role high quality office space plays in accommodating and supporting London's growth sectors and driving innovation, **between 2018 and 2023 London's CAZ lost 14 million sq ft of office space**, while **Camden saw a 51% decline in major office planning applications determined between 2013 and 2023**. The Euston Area Plan therefore represents a critical opportunity to reverse this trend and restore the delivery of new commercial floorspace in Camden.

Indeed, given the national importance of the Euston area, the Plan should align with the Government's and the Mayor's growth agendas and embed sufficient policy flexibility to enable high-density, well-connected development. This is essential to support the Knowledge Quarter, the wider borough of Camden and the UK economy.

Whilst we support the overarching vision for the area, it is essential aspects of the draft Plan do not undermine development viability and investor confidence as further policy details progress. We would urge consideration to be given to the levels of planning obligations and would encourage a **flexible policy framework that is commercially realistic and supportive of investment**. Additional feedback is set out in the Appendix.

Our dedicated **LPA Camden Working Group**, which regularly engages directly with Camden Council on policy and planning matters, has led on our response and looks forward to continuing to engage with officers and members as your Draft Plan progresses.

Yours faithfully,

Charles Begley
Chief Executive, London Property Alliance
[redacted]

[2] The Crossrail effect: How the Elizabeth line is transforming the capital, *London Property Alliance/Knight Frank, 2023*

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Appendix: London Property Alliance representation to the Euston Area Plan Proposed Submission Draft

Deliverability and viability

The regeneration of the Euston Area presents a significant opportunity to support a diverse mix of employment, retail, leisure, cultural and educational uses, helping to reinforce Euston's role as a major centre of activity within central London. Moreover, commercial development plays a critical role in funding infrastructure, public realm, and wider regeneration outcomes.

However, with commercial-led and mixed-use development already facing challenging macro-economic conditions and increasing regulatory complexity, and given the scale and complexity of the Euston Area – particularly in light of HS2 construction, land assembly challenges and infrastructure dependencies – a pragmatic and flexible policy framework is key to ensuring successful delivery.

We ask that the **Plan explicitly acknowledges the need for site-specific viability assessment at the planning application stage**. The Plan should **confirm that policy requirements may be applied flexibly where necessary to ensure deliverable development**. As demonstrated by the Euston Area Plan Viability Assessment (January 2026), **rigid policy targets risk hindering development** at the plan-making stage.

Role of commercial development

The success of the Euston Area as a globally competitive destination depends on the delivery of high-quality, flexible commercial floorspace capable of meeting modern occupier requirements. Whilst the Plan recognises the importance of employment uses, we consider that it should go further in supporting flexible office, life sciences and innovation-led development to contribute to the UK competitiveness on a global scale.

Euston is uniquely placed to accommodate this growth. Its location within the CAZ, proximity to the Knowledge Quarter, and role as a major transport hub mean it should be one of the capital's most productive innovation and employment clusters. The Plan should **place a greater emphasis on prioritising national objectives such as economic growth**, whilst maintaining flexibility in policy application.

The Plan should **clearly position commercial development as a key driver of regeneration**, rather than a residual land use. As our *Good Growth in Central London* research shows, a balanced approach to growth with flexible planning policy in Camden could **unlock 45,100 jobs**, **6,300 new homes** and an additional **4.4m sq ft of office floorspace by 2045** – boosting the borough's economy by £11.2bn (GVA) in addition to generating £268m in borough

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Community Infrastructure Levy (CIL) and Section 106 (s106) contributions.[3] This is in addition to the £37.7bn (GVA) already generated by Camden's service economy.[4]

Phasing, infrastructure, and HS2 uncertainty

The Plan is currently heavily dependent on the timing and delivery of HS2 and associated infrastructure. Given ongoing uncertainty regarding phasing, funding and delivery mechanisms, we are concerned that rigid policy linkages could stall development. We recommend that the Plan **adopts a flexible phasing strategy that allows development to come forward independently of HS2** where appropriate. This flexibility will be essential to maintaining momentum and confidence during a prolonged construction and transition period.

Design, height, and density

We support high-quality design and contextual placemaking. However, given Euston's role as a major transport interchange and growth location in central London, the Plan **should fully embrace appropriate density and building heights as a means of delivering the quantum of high-quality office space and new homes needed to support economic growth** and regeneration objectives.

We are concerned **that height guidance is overly restrictive** or insufficiently responsive to site context. Given the Euston Area's location and function as a major transport hub, we consider it reasonable for height thresholds to be defined by the masterplan boundary rather than the CAZ boundary. We **recommend that the Plan clearly supports tall and high-density development in suitable locations**, to ensure that it can properly capitalise on the investment made in its regeneration and its improved connectivity.

[3] ***Good Growth in Central London***, London Property Alliance/Arup, 2024.
[4] ***Regional gross value added (balanced) by industry: local authorities by ITL1 region (current prices, pounds millions)***, *ONS, April 2025.*

R37

Outlook

Updated logo's

From Ben Olney [redacted]
Date Mon 12/01/2026 11:42
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

1 attachment (140 KB)
London St.Pancras Highspeed_Logos RGB-Black.jpg;

[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 Morning I don't have any major comments on the updated Euston Area Action Plan, but could you please update both the High Speed 1 and Eurostar logos which are out of date.....

High Speed 1 is now known as London St Pancras - Highspeed and our corporate logo is attached, this should replace the HS1 logo

Eurostar Corporate logo has also been changed to https://commons.wikimedia.org/wiki/File:Eurostar_logo_%282023%29.svg although you may wish to contact them for an official file.

The other comment I would have would be to identify proposed Crossrail2 station entrances at both Euston and St Pancras end of the proposed platforms

Regards

R37

LONDON ST.PANCRAS HIGHSPEED

BEN OLNEY

Planning, Properties and Masterplanning Manager

[redacted] @ [redacted]

www.stpancras-highspeed.com [redacted]

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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	Mohammed	
Last Name	Miah	
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	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	No
2) Sound	Yes		No	No
3) Complies with the Duty to co-	Yes		No	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)	NO
2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate	NO
3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities)	NO
4) Consistent with national policy	NO

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.

The Plan is unsound because it is not justified, not effective with national policy:

Not Justified (insufficient evidence/reasonable alternatives not properly addressed):
The allocation sets a tall-building parameter (up to ~75m) without proportionate, plan-stage evidence demonstrating that the resulting effects on the residential area to the north including Tolmers Square can be made acceptable. The Plan relies on later "detailed design and testing" and generic statements about mitigation, rather than establishing a verified development envelope that avoids unacceptable harm.

Not Effective (lack of binding criteria/unenforceable mitigation):
While the Plan acknowledges the need to mitigate impacts on residential amenity to the north, it does not secure clear, enforceable requirements that would make the allocation deliverable without harm e.g., binding limits/criteria for daylight/sunlight, overshadowing, overlooking/privacy, wind microclimate, noise/air quality, and construction impacts. This creates a high risk that the Plan will be implemented through future applications that place an unreasonable burden on existing residents to defend basic living conditions, contrary to effective plan-making.

Not Consistent with national policy (healthy, safe, high-quality places):
National policy requires planning to secure healthy, livable places and to prevent unacceptable adverse impacts on living conditions. The Plan's current tall-building parameter adjacent to a sensitive residential neighborhood and square risks undermining these objectives because it does not demonstrate, at Plan stage, that harm can be avoided and does not hard-wire adequate protections.

Cumulative impacts:
The Euston area is already subject to significant cumulative disruption and long construction periods from strategic projects. The Plan does not adequately address the combined effects of large-scale redevelopment in this location on established communities north of Euston Road, including Tolmers Square, nor does it secure a robust cumulative-impact mitigation package at Plan stage.

For these reasons, the Plan's approach to EA4 (including the tall-building parameter) is unsound

(Continue on a separate sheet if necessary)

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.

(Modifications needed)

Requested modifications to make the Plan sound (EA4 – 250 Euston Road):

A) Remove or significantly reduce the tall-building parameter for EA4. In particular, delete the reference to a potential building "up to approx. 75m" at Euston Road/North Gower Street, or replace it with a requirement that any height/massing must be fully design-led and demonstrably incapable of causing unacceptable harm to the residential area to the north (including Tolmers Square), supported by verified assessments.

B) Insert a binding amenity safeguard policy test within the EA4 allocation requiring (at minimum):

independent Daylight/Sunlight assessment demonstrating no unacceptable loss to surrounding homes and to Tolmers Square's environmental quality;

Privacy/overlooking safeguards and separation standards;

Wind microclimate criteria to avoid dangerous/uncomfortable wind conditions around Tolmers Square and pedestrian routes;

Noise and air quality protections for existing residents (construction and operation);

a Construction Impact Mitigation Framework (limits on working hours, lorry routing away from residential streets, monitoring, enforcement triggers, resident liaison, and cumulative-impact controls).

C) Add wording requiring a genuinely plan-led assessment of reasonable alternatives, including refurbishment/retention options and lower-rise massing options, to demonstrate the allocation is the most appropriate strategy and not an overdevelopment assumption.

These changes are necessary to ensure the allocation is justified, effective, and consistent with national policy, and to ensure Tolmers Square residents' amenity is protected in a plan-led, enforceable way.

(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:

Because the allocation introduces a tall-building parameter with potentially significant residential amenity impacts on Tolmers Square that require examination and potential main modifications.

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

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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:	Mohammed Miah	**Date:**	27/02/2026

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.

HEIGHT & TOWNSCAPE OBJECTION

EA4 – 250 Euston Road (Up to ~75m Parameter)

Urban Design & Transition Failure

Resident: Tolmers Square

1. Core Issue

The allocation for **EA4 – 250 Euston Road** introduces a potential building height of **up to approximately 75 metres** at the corner of Euston Road and North Gower Street.

This height parameter is structurally flawed because it:

- Fails to demonstrate a coherent height transition strategy
- Risks creating a cliff-edge scale relationship with Tolmers Square
- Is not supported by plan-stage townscape modelling
- Is introduced without a tested design envelope

This renders the allocation **not justified and not effective**.

2. Failure of Height Transition Strategy

Good strategic planning requires:

- A clearly defined hierarchy of building heights
- Gradual stepping of scale from major corridors to residential neighbourhoods
- Protection of established character areas
- A defensible urban design logic

The EAP does not demonstrate:

- A corridor-wide height strategy along Euston Road
- A defined graduation from tall frontage to lower-rise residential hinterland
- How 75m relates proportionately to surrounding built form north of Euston Road

Tolmers Square is a predominantly mid-rise residential enclave immediately behind the Euston Road frontage.

Introducing a 75m element at the edge risks:

- A severe scale contrast
- Visual dominance
- Perceived enclosure
- A breakdown in urban grain continuity

There is no plan-stage evidence that this transition is appropriately resolved.

3. Townscape Harm

A. Scale & Massing Disruption

A 75m structure in this location would materially alter:

- The skyline profile
- The perception of openness north of Euston Road
- The visual setting of Tolmers Square

Without verified townscape modelling, the Plan cannot conclude that harm will be avoided.

B. Loss of Human Scale

Urban design best practice emphasises:

- Human-scaled frontages
- Active street edges
- Appropriate contextual response

A tall building at this junction risks prioritising skyline impact over neighbourhood integration.

This is a strategic design flaw at allocation stage.

C. Cliff-Edge Condition

The Plan does not define:

- Maximum podium heights
- Step-back requirements
- Setback distances from residential boundaries
- Transitional massing controls

Without these, the allocation creates the risk of a vertical wall condition facing a lower-rise residential neighbourhood.

That is poor strategic planning.

4. Absence of Evidence-Led Envelope

If 75m is to be considered appropriate, the Plan should have included:

- Verified daylight/sunlight envelope modelling

- Wind microclimate testing
- Verified cumulative townscape analysis
- View corridor testing
- A defined build-to envelope

Instead, the Plan states a height parameter first and defers testing.

This reverses proper plan-making logic.

5. Strategic Overreach

Allocations should be design-led, not height-led.

By inserting “up to approximately 75m” into policy, the Plan:

- Pre-conditions decision-making
- Signals height expectation
- Weakens residents’ ability to challenge scale at application stage

This is not neutral policy drafting.

6. Required Main Modification (Height-Specific)

To make EA4 sound, the following modification is required:

Delete the explicit 75m reference.

Replace with:

“Development at EA4 must be fully design-led and demonstrate an appropriate and gradual transition in height and massing from Euston Road frontage to the residential neighbourhood to the north, including Tolmers Square. Development must demonstrably avoid unacceptable townscape, skyline, and residential amenity harm.”

Alternatively:

Cap height at a level demonstrably proportionate to surrounding built form following corridor-wide analysis.

7. Why This Matters

Once a tall-building parameter is embedded in an adopted Plan, it becomes extremely difficult to resist at application stage.

Therefore, the Examination stage is the critical moment to correct structural overreach.

This is not an anti-development argument.

It is a pro-good-planning argument.

8. Conclusion

The 75m height parameter at EA4:

- Lacks a coherent height transition strategy
- Risks cliff-edge massing impact on Tolmers Square
- Is unsupported by proportionate evidence
- Is not design-led
- Is not justified

Unless modified, EA4 should not be found sound.

R38

Rachel English

From: Ahad <[redacted]>
Sent: 22 January 2026 08:30
To: EustonAreaPlan; Ahad
Subject: Regulation 19 Representation – Euston Area Plan Update (Tolmers Square Resident)

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

Dear Sir / Madam,

I am writing as a [redacted] to make a formal representation in response to the Euston Area Plan Update – Proposed Submission Draft (January 2026), pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

My representation relates specifically to the allocation of Site EA4 – 250 Euston Road, and the implications of that allocation for Tolmers Square and its residents.

Grounds of Objection – Soundness

I object to the Euston Area Plan Update insofar as it relates to Site EA4, on the basis that the Plan is not sound, for the reasons set out below.

1. Not Justified (NPPF §35(b)

Tolmers Square is a well-established residential square containing a valued communal open space that makes a significant contribution to residential amenity, environmental quality, daylight, outlook and tranquillity for surrounding homes.

The allocation of Site EA4 for intensified mixed-use redevelopment, including the potential for increased height and density, is not justified because the Plan does not provide sufficient site-specific evidence to demonstrate that such development can be delivered without causing unacceptable harm to:

- Daylight and sunlight received by homes surrounding Tolmers Square

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- The open character and environmental function of the square
- Residents' outlook, privacy and sense of enclosure
- Noise levels and general residential amenity

The Plan relies on future planning applications to resolve these fundamental impacts, rather than addressing them at plan-making stage. Given the proximity of Site EA4 to sensitive residential receptors and amenity space, this approach is inappropriate and unjustified.

2. Not Consistent with National Policy (NPPF §35(d)

The allocation of Site EA4 is not consistent with the National Planning Policy Framework, which requires Local Plans to:

- Secure a high standard of amenity for existing residents
- Protect valued open spaces that contribute to community well-being
- Create places with a high quality of life

Tolmers Square clearly functions as a valued local amenity open space, regardless of its formal designation. The Plan fails to demonstrate that increased scale, height or intensity of development at Site EA4 would preserve the square's environmental role or avoid indirect harm caused by overshadowing, enclosure and intensified activity.

3. Conflict with Camden Local Plan Policies

The Euston Area Plan Update also fails to demonstrate consistency with the adopted Camden Local Plan, in particular:

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Policy LP26 (Open Space)

Tolmers Square provides important amenity value for local residents. The Plan does not demonstrate that development at Site EA4 would avoid harm to this amenity open space through overshadowing, enclosure, noise or activity spill-over.

Policy LP28 (Design Quality)

The allocation contains no site-specific safeguards to ensure that potential increases in height or massing would respond appropriately to the sensitive residential context of Tolmers Square or avoid overbearing and dominant impacts.

Policy LP30 (Amenity)

The Plan defers assessment of foreseeable impacts on daylight, sunlight, outlook and noise to future planning applications, despite the close proximity of Site EA4 to existing homes. This is inconsistent with the requirement to protect residential amenity.

4. Not Effective (NPPF §35(c)

The Plan is not effective because it does not adequately address deliverability and context, including:

- The constrained residential environment surrounding Tolmers Square
- The cumulative impacts of redevelopment along Euston Road on nearby residential streets
- The existence of a long-term lease at 250 Euston Road extending to approximately 2039, making delivery within the plan period speculative

As a result, the allocation risks creating prolonged uncertainty for residents without providing clear, enforceable safeguards.

R38

Requested Modifications

To make the Plan sound, I request that the Council:

1. Amend the allocation for Site EA4 to remove or materially constrain assumptions regarding increased height and density where these could adversely affect Tolmers Square; and/or
2. Introduce explicit, site-specific policy safeguards requiring:
    - Protection of daylight and sunlight to Tolmers Square
    - Protection of the square's open character and residential amenity
    - Clear limits on height, massing and proximity to residential properties

Conclusion

For the reasons set out above, I consider that the Euston Area Plan Update, in relation to Site EA4 – 250 Euston Road, is not justified, not effective, and not consistent with national planning policy or the Camden Local Plan, and should not be found sound unless modified.

I request that this representation be forwarded to the independent Planning Inspector for consideration as part of the examination process.

Yours faithfully,

Mr M Miah

Resident [redacted]

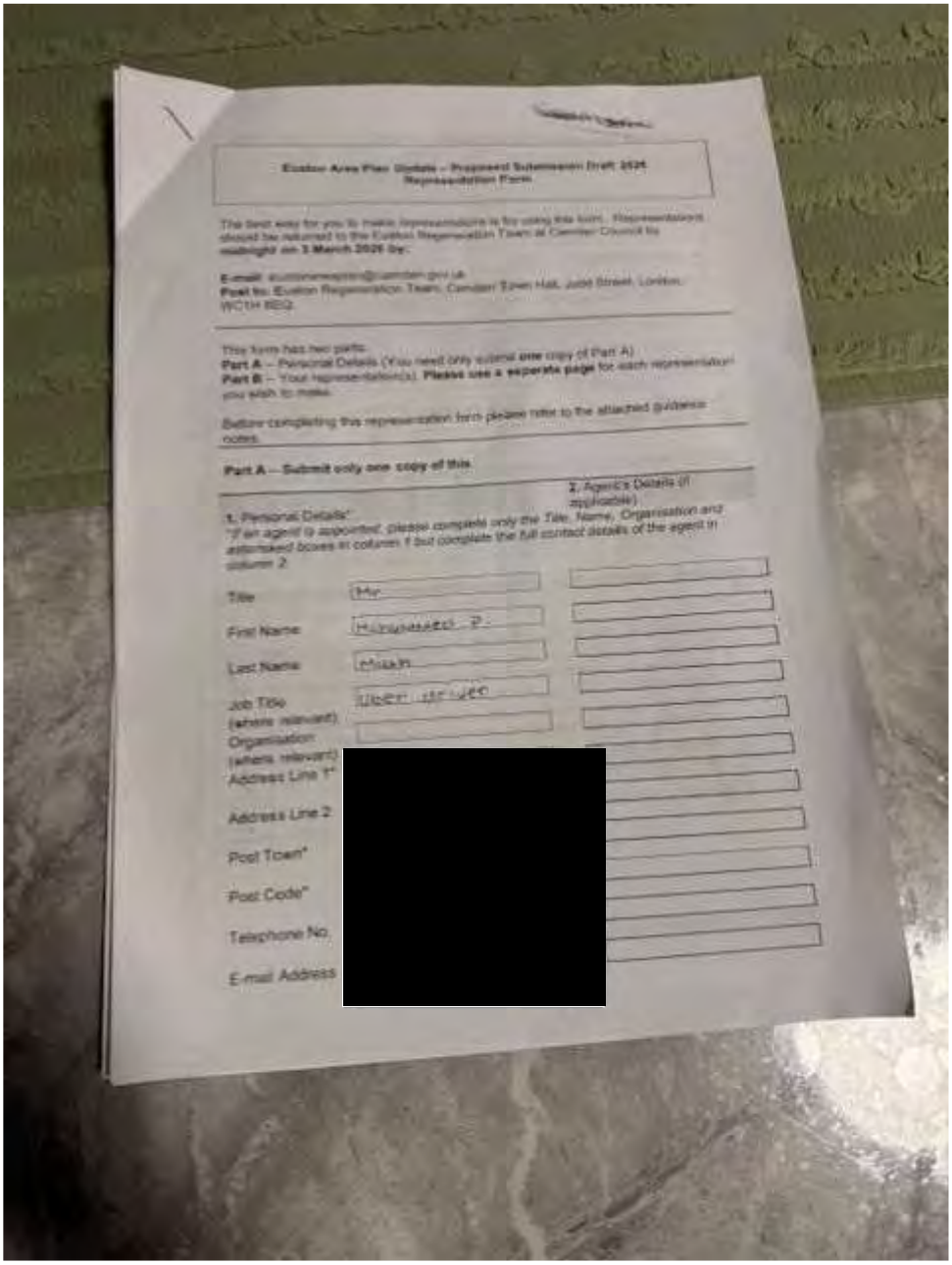
[redacted]

R39

Outlook

Euston area plan update

From Pourash Miah [redacted]
Date Sun 01/03/2026 21:41
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>



Euston Area Plan Update – Proposed Submission Draft 2024
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 2 March 2026 by:**

E-mail: eustonareaplan@camden.gov.uk
Post to: Euston Regeneration Team, Camden Town Hall, Judd Street, London, WC1H 9EQ.

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* *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.		2. Agent's Details (if applicable)
Title	Mr	
First Name	Muhammed P.	
Last Name	Miah	
Job Title (where relevant)	Uber driver	
Organisation (where relevant)		
Address Line 1*	[redacted]	
Address Line 2		
Post Town*		
Post Code*		
Telephone No.		
E-mail Address		

[redacted]

R39

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

Part B – Please use a separate page for each representation

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

Name or Organisation:

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

Please use the links below to view the documents:

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

Paragraph		Policy	EA4 IEAS	Policies Map	EA4 IEAS

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

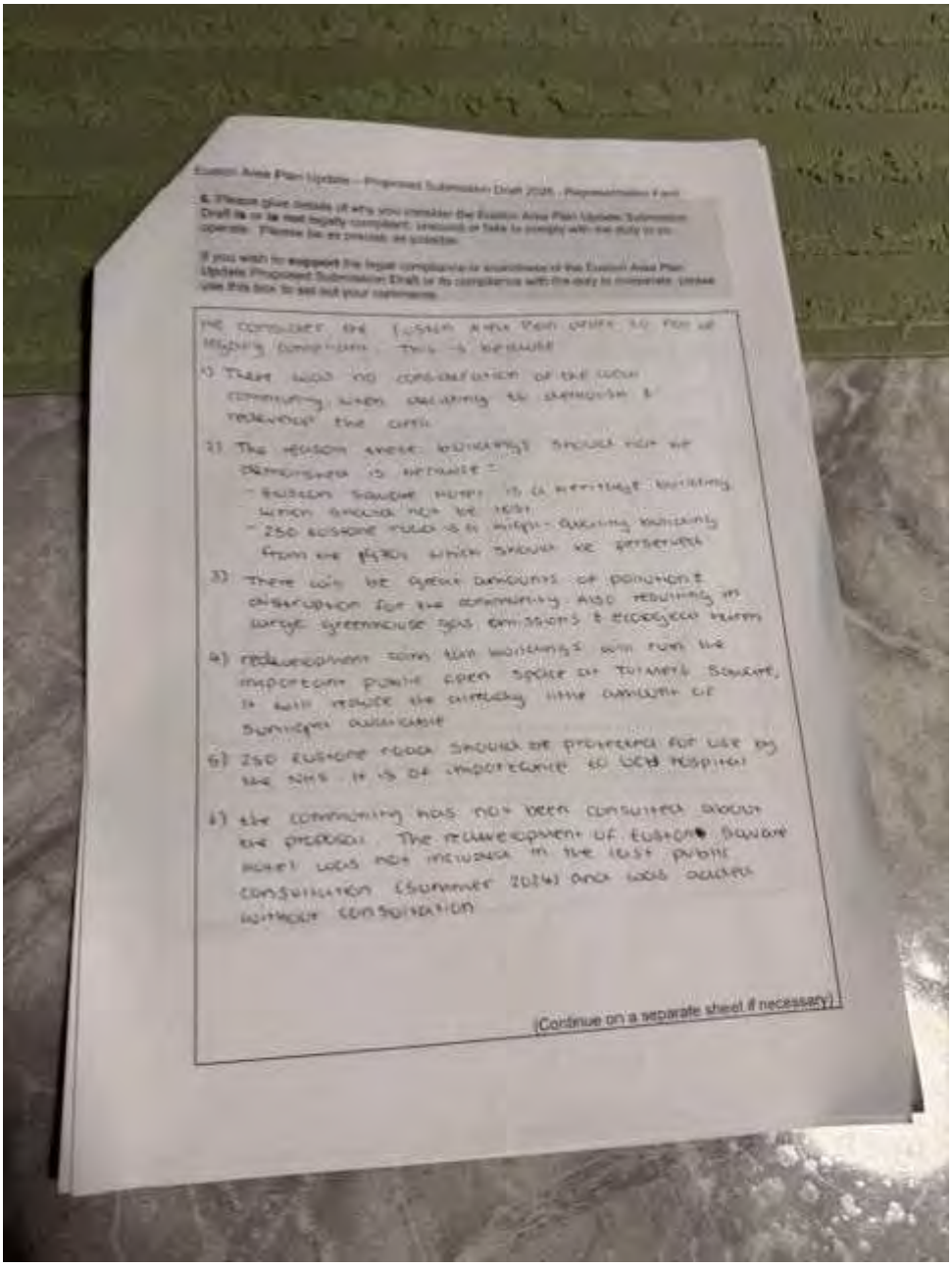
1) Legally compliant	Yes		No	✓
2) Sound	Yes		No	✓
3) Complies with the Duty to co-	Yes		No	✓

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 ✓

R39



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 co-operate, please use this box to set out your comments.

We consider the Euston Area Plan Update to not be legally compliant. This is because

1) There was no consideration of the local community when deciding to demolish & redevelop the area

2) The reason these buildings should not be demolished is because:
- Euston Square Hotel is a heritage building which should not be lost
- 250 Euston road is a high-quality building from the 1970s which should be preserved

3) There will be great amounts of pollution & disruption for the community also resulting in large greenhouse gas emissions & ecological harm

4) redevelopment from tall buildings will ruin the important public open space at Tolmers Square, it will reduce the already little amount of sunlight available

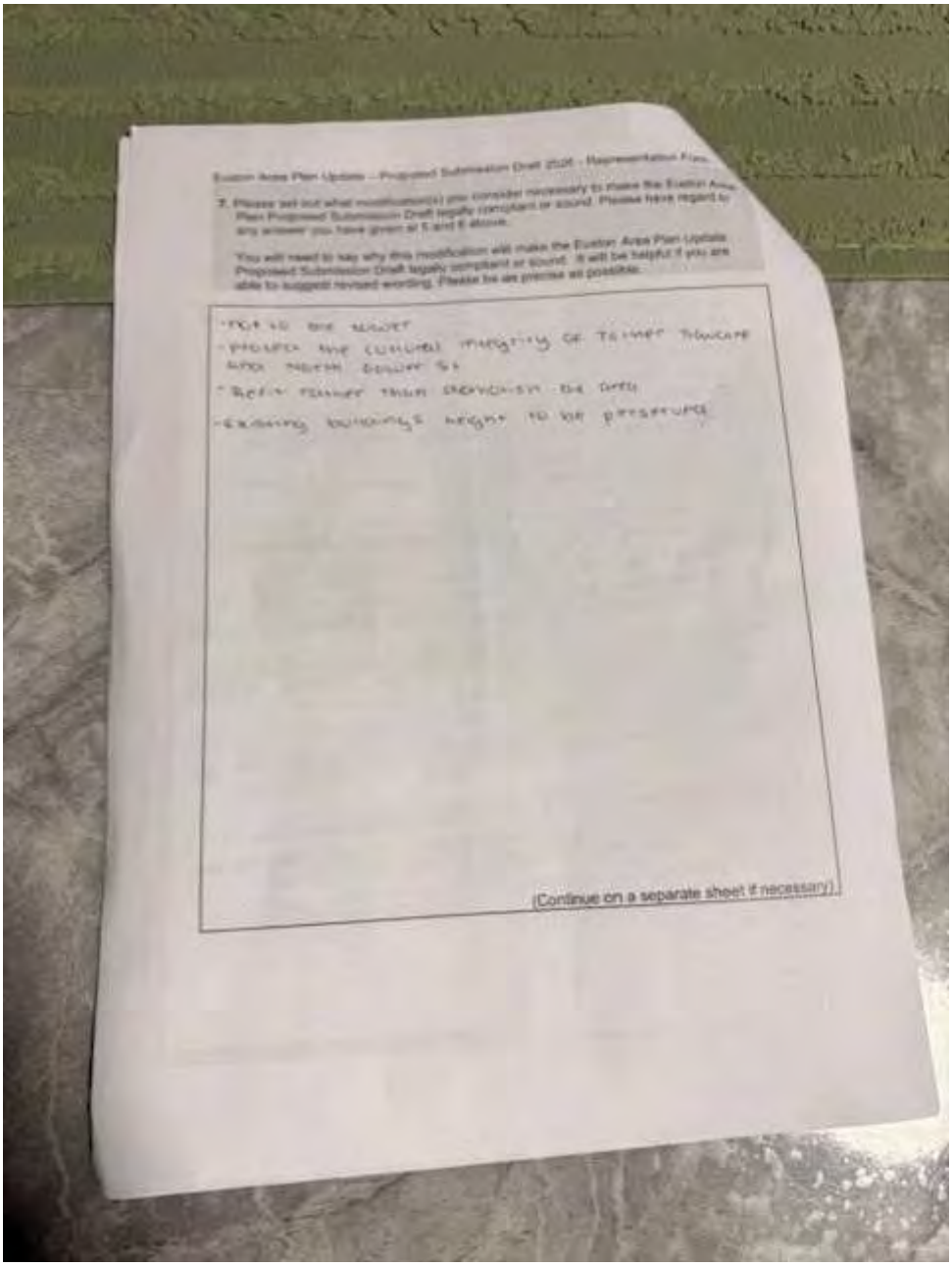
5) 250 Euston road should be protected for use by the NHS. It is of importance to UCH hospital

6) the community has not been consulted about the proposal. The redevelopment of Euston Square Hotel was not included in the last public consultation (summer 2024) and was added without consultation

(Continue on a separate sheet if necessary)

[redacted]

R39



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.

- not to be lower
- protect the cultural integrity of Tolmer Towers and North Gower St
- Refit Tolmer than demolish the area
- existing buildings height to be preserved

(Continue on a separate sheet if necessary)

[redacted]

R39

Eastern 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 ☑ 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.

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.*

[redacted]

R39

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

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:	1/3/26

[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.

[redacted]

fisher german

Fisher German LLP
The Estates Office
Norman Court
Ashby de la Zouch
LE65 2UZ

[redacted]
fishergerman.co.uk

Our Ref: [redacted]

05 February 2026

Camden Borough Council
eustonareaplan@camden.gov.uk
via email only

Dear Sir /Madam,

EAP Update – Proposed Submission Draft Consultation January – March 2026 Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

NGET assets within the Plan area

Following a review of the above Supplementary Planning Document (SPD), we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below.

Asset Description
Tunnel - ST JOHNS WOOD - HIGHBURY
Cable: HIGHBURY - ST JOHNS WD 2 CABLE 1 CABLE ROUTE: HIGHBURY - ST JOHNS WD 2 CABLE SECT: 04-05

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Regulated by RICS
RTPI Chartered
bmtrada UKAS MANAGEMENT SYSTEMS 30691
bmtrada
bmtrada UKAS MANAGEMENT SYSTEMS 0012

fisher german

A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.
https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps

New Infrastructure

Currently there are no known new infrastructure interactions within the area, however demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-carbon generation.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Taking this context into account, In planning for the area the Council should:

- **Safeguard all existing NGET transmission assets**, including overhead lines, underground cables and substations.
- **Support future reinforcement and expansion**, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.
- **Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.**
- **Safeguard existing and potential access routes** required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.
- **Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access**, unless suitable mitigation or alternative agreed routes can be secured.
- **Encourage early engagement with NGET** to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

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fisher german

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

Angela Brooks MRTPI, Partner

[redacted]

Fisher German LLP
The Estates Office
Ashby de la Zouch
LE65 2UZ

Tiffany Bates, Development Liaison Officer

box.landandacquisitions@nationalgrid.com

National Grid Electricity Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[redacted]

Angela Brooks MRTPI
Partner

For and on behalf of Fisher German LLP

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Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgrid.com/document/345326/download

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here: https://www.nationalgrid.com/document/349291/download

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/

For local planning policy queries, please contact: ngplanning@fishergerman.co.uk

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bmtrada UKAS MANAGEMENT SYSTEMS 30691

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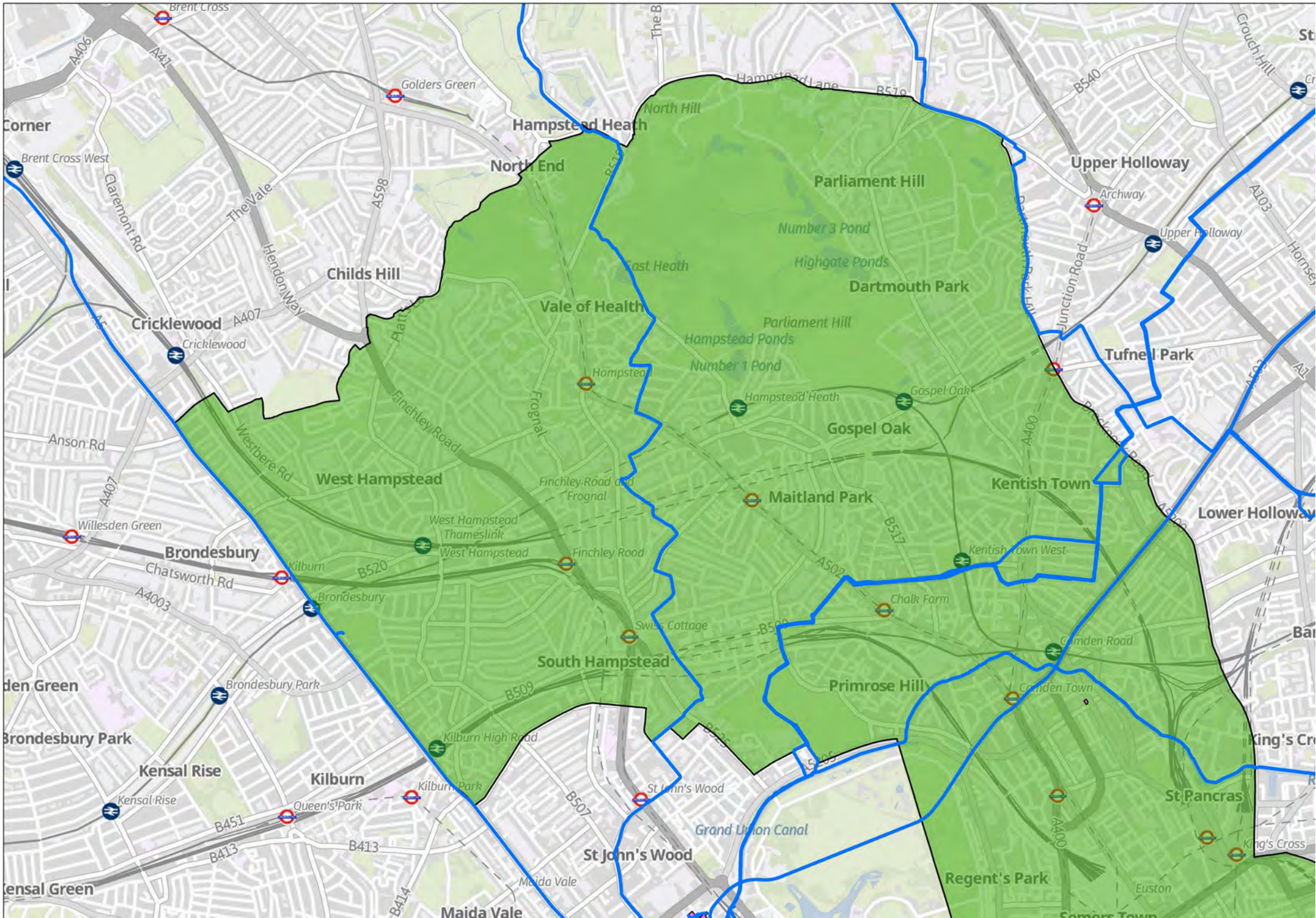
Brent Cross
Golders Green
Hampstead Heath
North Hill
North End
Parliament Hill
Upper Holloway
Archway
Upper Holloway
Number 3 Pond
Highgate Ponds
East Heath
Dartmouth Park
Childs Hill
Vale of Health
Cricklewood
Cricklewood
Parliament Hill
Hampstead Ponds
Number 1 Pond
Tufnell Park
Hampstead
Hampstead Heath
Gospel Oak
Gospel Oak
Kentish Town
West Hampstead
Finchley Road and Frognal
Maitland Park
Lower Holloway
West Hampstead Thameslink
West Hampstead
Finchley Road
Kentish Town West
Willesden Green
Brondesbury
Kilburn
Brondesbury
Chalk Farm
Swiss Cottage
Camden Road
South Hampstead
Brondesbury Park
Primrose Hill
Camden Town
Kilburn High Road
Kensal Rise
Kilburn
Kilburn Park
Kensal Rise
Queen's Park
St John's Wood
St Pancras
Grand Union Canal
St John's Wood
King's Cross
Regent's Park
Maida Vale
Maida Vale
Euston
Brent Cross West
Claremont Rd
The Vale
Hendon Way
Finchley Road
Frognal
Anson Rd
Westbere Rd
Chatsworth Rd
Junction Road
Crouch Hill
Hornsey
A406
A41
A598
A407
A4003
B520
B509
B451
B413
B414
B507
B540
B517
A502
A400
A103

R40

Outlook

Euston AP Update – Proposed Submission Draft Consultation - NGET Response

From NG Planning <ngplanning@fishergerman.co.uk>
Date Thu 05/02/2026 14:15
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

1 attachment (3 MB)
Euston AP Update – Proposed Submission Draft Consultation - NGET Response.pdf;

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

Dear Sir / Madam

Euston Area Plan Update – Proposed Submission Draft Consultation January – March 2026
Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission (NGET) has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the attached representation with regard to the current consultation on the above document.

If you require any further information in respect of this letter, then please contact us.

With kind regards,
Bradley

R41

Outlook

FAO Planning Team REF: Euston Area Action Plan – proposed Submission draft

From SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Date Fri 06/02/2026 08:09
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

[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.

Your Ref: Euston Area Action Plan – proposed Submission draft
Our Ref: 537841

Dear Sir or Madam

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has no comments to make on the proposed Submission draft of the Euston Area Action Plan.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours faithfully

Sharon Jenkins
Assistant Officer
Natural England
Consultation Service
Worcester
Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england

Thriving Nature for people and planet

R41 Please be aware there is a PLANNING DELIVERY NEWS page that highlights planning casework news. Please check this regularly.

This page also includes a link to the HR/HO pipeline, Area Team MI data as well as regular Hub statistics. This is your weekly source of planning updates and performance data, which is located within the Planning Performance updates section.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see here
For further information on the Pre-submission Screening Service see here

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R42

Outlook

Euston Area Plan (EAP) Update – Proposed Submission Draft

From SUMMERS, Mhairi [redacted]
Date Tue 03/03/2026 19:42
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

1 attachment (157 KB)
EAP consultation response - NCL HUDU .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 Planning Policy Team,

Thank you for consulting the NHS on the Euston Area Plan (EAP) Update – Proposed Submission Draft. Please find attached our response which has been prepared in consultation with the North Central London Integrated Care Board (NCL ICB).

Please let me know if you would like to discuss the attached.

Kind regards,

Mhairi

Mhairi Summers| Planning Officer
NHS London Healthy Urban Development Unit (HUDU)
[redacted]

NHS
London Healthy Urban Development Unit

****
** **********

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ii) do not disclose, copy or distribute information in this e-mail or take any

R42 action in relation to its content (to do so is strictly prohibited and may be unlawful).
Thank you for your co-operation.

NHS.net Connect is the secure email, collaboration and directory service available for all NHS staff in England. NHS.net Connect is approved for exchanging patient data and other sensitive information with NHS.net Connect and other accredited email services.

For more information and to find out how you can switch visit Joining NHS.net Connect - NHS.net Connect Support

[redacted]

R42

Planning Policy Team
Euston Regeneration
5 Pancras Square London
N1C 4AG

NHS
London Healthy Urban Development Unit
20 Churchill Place
London
E14 5HJ
[redacted]

03 March 2026

Dear Planning Policy Team,

Thank you for consulting the NHS on the Euston Area Plan (EAP) Update – Proposed Submission Draft. This response has been prepared in consultation with the North Central London Integrated Care Board (NCL ICB), which is responsible for commissioning and overseeing healthcare services in Camden.

Consultation Response

The NHS welcomes the recognition of health and wellbeing as a cross-cutting priority throughout the document, embedded throughout the strategic principles.

We also welcome the inclusion of comments provided during previous consultations within the Proposed Submission Draft. In particular, we note and support the following:

1. Within Strategic Principle EAP1, confirmation that major development proposals at Euston will be required to submit a Health Impact Assessment and appropriately incorporate its findings (pg. 46).
2. Confirmation that development within the EAP area will be expected to contribute to an appropriate provision of healthcare facilities, including through developer contributions from major housing schemes to mitigate additional demand on health infrastructure (pg. 61).
3. Confirmation that the EAP team will continue to work with the NHS to consider the implications of anticipated housing and employment growth for health infrastructure provision (pg. 61).
4. Recognition of the integrated hub model as the most efficient way to deliver additional healthcare provisions (pg. 61).

In relation to Strategic Principal EAP 1, we note Part E: Social Infrastructure requires the submission of a Community Strategy to inform how appropriate social infrastructure will be conceived and developed over time. The NHS would welcome the opportunity to be consulted on the preparation of this strategy, as a number of key healthcare facilities are located within the EAP area and in the immediate surrounding areas.

The NHS seeks further clarity in relation to Section 5.7 (Planning Obligations and Infrastructure Delivery) and Appendix 2: Delivery Plans. While Section 5.7 confirms that both

Section 106 and CIL can be used to fund health and community infrastructure, the Summary Table in Appendix 2 identifies CIL, in some instances, as the sole potential funding source.

Both CIL and Section 106 are important funding mechanisms for the NHS. We would therefore welcome further discussions with the Council to better understand the rationale for identifying certain projects as appropriate for CIL funding only, while others are considered suitable for both Section 106 and CIL contributions. This is particularly important given that NHS Capital Guidance 2026/27 makes clear that:

"Capital allocations do not cover additional facilities required due to housing developments. NHS organisations should work with local authorities to secure developer contributions for extra capacity."

Conclusion

The NHS supports the Euston Area Plan Update and welcomes the inclusion of previous NHS comments within the Proposed Submission Draft. We look forward to continuing to work collaboratively with the Council to ensure that the growth proposed within the EAP area is supported by timely and appropriate healthcare infrastructure and that health impacts are appropriately mitigated.

Yours faithfully,

Mhairi Summers
Planning Officer
NHS London Healthy Urban Development Unit

R43

Rachel English

From: geff per <[redacted]>
Sent: 29 January 2026 14:04
To: EustonAreaPlan

[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.

Hi there
After reading the future plans it appears that there is no accomodation for phv drivers that are employed by the West coast Avanti group to take train passengers to their onward destination due to disruption. As it is, the old taxi rank in Melton street was capable of taxing 60 cars for such emergencies.

HS2 works have now pushed that figure down to 8 cars which share with lorries and dropping off point point.

Your plans do not accommodate for this problem, only for taxi pickups.

The only place for these onward bound travellers to go for Avanti paid transport would be Gordon street which is (a) a fair unsafe walk, (b) a serious health and safety issue.

Please understand, once or twice a week around 10 cars are needed, however around once a month upto 60 cars are required, making this a nightmare for both drivers and passengers.

You plan suggests some phv spaces in Eversholt street, that is where the Uber type cars pick up so those 5 + spaces suggested would just cause major chaos
I could go on but l just hopefully believe that you have no knowledge of this and have not calculated how to deal with it in your planning

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.

R44

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	MR.	
First Name	HARISH	
Last Name	BAGUATY	
Job Title (where relevant)	[redacted]	
Organisation (where relevant)	Plentifool Foods Ltd	
Address Line 1*	[redacted]	
Address Line 2	Drummond Street	
Post Town*	Euston	
Post Code*	NW1 2HL	
Telephone No.	[redacted]	
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.*

R44

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

Part B – Please use a separate page for each representation

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

Name or Organisation:

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

Please use the links below to view the documents:

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

Paragraph		Policy	EA4/EA5	Policies Map	EA4/EA5

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

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	✓

R44

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.

[redacted] Spice Shop in Drummond St.
I object to the proposals because:

1) There has been no consultation with local bussinesses and residents about the inclusion of tower blocks at the sites of 250 Euston Rd + Euston Sq Hotel.

2) Prolonged demolition + construction will have a negative impact on bussinesses in the Drummond st area, who are already dealing with impact of HS2 construction for years!

3) 250 Euston Rd + Euston Sq Hotel are fit for purpose functioning buildings which should be refitted rather than demolished

4) 250 Euston Rd is part of the UCL hospital and so is vital for the delivery of NHS services.

These proposals should not proceed until there has been proper consultation with residents and bussinesses.

(Continue on a separate sheet if necessary)

R44

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)

R44

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.*

R44

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

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

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

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

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

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NEWMARK

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London W1T 3JJ
Tel. +44 (0)20 7493 3338
nmrk.com/en-gb

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

Sent by Email – eustonareaplan@camden.gov.uk

Our ref: ANE

Your ref:

26 February 2026

Euston Area Plan – Site Allocation EA3 (The Place and Premier Inn)

Representations Submitted on Behalf of the Whitbread, the owners and operators of the Premier Inn

Introduction

These representations are submitted on behalf of Whitbread, the owners and operators of the Premier Inn hotel which forms part of the Site Allocation EA3.

Our client supports the overarching regeneration objectives of the Euston Area Plan and is considering bringing forward early investment through a hotel-led redevelopment of the existing Premier Inn site. However, we object to any policy wording that implies or promotes comprehensive redevelopment across multiple adjoining ownerships as a prerequisite or expectation for development.

For the allocation to be effective, justified and deliverable, it must clearly support standalone, plot-based redevelopment proposals.

Support for Mixed-Use and Hotel Intensification

The site lies within the Central Activities Zone (CAZ) and benefits from exceptional public transport accessibility (PTAL 6b), immediate proximity to Euston Station, and a strategic location within a nationally significant growth area.

We support the allocation of the site for mixed-use development including hotel, residential and commercial uses. In particular, the Premier Inn site is highly suitable for:

- Hotel intensification and modernisation;
- Increased visitor accommodation;
- Active ground floor uses;
- Public realm and greening improvements;

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- Enhanced environmental performance.

London Plan Policy SD4 (CAZ) supports development that strengthens London's strategic commercial and visitor economy functions. The intensification of hotel accommodation in this location directly aligns with those objectives.

A hotel-led redevelopment of the Premier Inn site would:

- Support employment and economic growth;
- Contribute to London's visitor infrastructure;
- Improve the Euston Road frontage;
- Deliver high-quality design in a prominent gateway location.

The allocation should positively and explicitly support such operator-led investment.

Objection to Implied Comprehensive Redevelopment

The allocation currently states:

"A comprehensive approach which includes the adjacent sites of the Premier Inn hotel, the office building (18 Duke's Road) and The Place could be considered."

While expressed permissively, this wording risks creating an expectation that development should come forward comprehensively across multiple ownerships.

We object to any interpretation that:

- Delays or discourages standalone redevelopment;
- Requires coordination across unrelated land interests;
- Conditions redevelopment of the Premier Inn site on third-party participation;
- Undermines deliverability within the plan period.

Land Ownership and Deliverability

The allocation comprises several distinct landholdings, including:

- The Premier Inn hotel (operational commercial use);
- Social housing at Somerton House;
- Office accommodation;
- A cultural and educational facility (The Place) within a listed building.

There is no realistic short- or medium-term prospect of comprehensive land assembly across all these parcels. They are subject to different ownership structures, operational requirements and statutory considerations.

The National Planning Policy Framework (NPPF) requires that site allocations be deliverable and effective. An approach that relies on uncertain land assembly risks rendering the allocation ineffective.

Phased and Plot-Based Regeneration

Regeneration in the Euston area will inevitably occur incrementally and across multiple ownerships over time.

A standalone redevelopment of the Premier Inn site can:

- Deliver high-quality design responding to its immediate context;
- Improve the Euston Road frontage;
- Provide enhanced public realm and greening;
- Respect the setting of nearby heritage assets;
- Integrate with future adjacent development if and when it comes forward.

There is no planning justification for requiring comprehensive redevelopment where the objectives of the allocation can be achieved on an individual plot basis.

Height and Design

The allocation identifies potential heights ranging from approximately 20m (42m AOD) at the southern end of the site to up to approximately 40m (62m AOD) to the north, with potential for taller buildings on Euston Road subject to assessment.

We support a contextual, design-led approach to height. In particular:

- Euston Road is characterised by large-scale development;
- The site sits outside the Bloomsbury Conservation Area;
- The surrounding townscape along Euston Road accommodates significant variation in height and massing;
- Tall building assessment and LVMF testing can robustly address strategic views.

A hotel-led redevelopment can achieve appropriate height transitions toward Duke’s Road while optimising scale along Euston Road.

Height and massing strategy should not be contingent upon comprehensive redevelopment across the wider allocation.

Heritage Considerations

We acknowledge the site’s proximity to:

- The Grade II listed 17 Duke’s Road;

- The Bloomsbury Conservation Area;
- The Grade I listed Church of St Pancras;
- London View Management Framework corridors.

These constraints can be fully and robustly addressed through:

- Detailed Heritage Impact Assessment;
- Verified views and LVMF analysis;
- Sensitive design and massing refinement.

There is no evidence that standalone redevelopment of the Premier Inn site would inherently cause harm to designated heritage assets. Policy should allow proposals to be assessed on their merits at planning application stage.

Public Realm, Healthy Streets and Sustainability

The Premier Inn site alone has the capacity to deliver meaningful improvements, including:

- Active frontage along Euston Road;
- Public realm upgrades consistent with the Euston Healthy Streets project;
- Increased urban greening and soft landscaping;
- Sustainable urban drainage measures;
- Improved environmental performance and operational carbon reductions.

Such improvements can be secured through planning conditions and obligations without reliance on cross-site assembly.

Requested Modification

To ensure clarity, deliverability and policy effectiveness, we request that the allocation wording be amended as follows:

Delete:

“A comprehensive approach which includes the adjacent sites of the Premier Inn hotel, the residential Somerton House, the office building and The Place could be considered.”

Replace with:

“Development may come forward on an individual plot basis or comprehensively across multiple sites. Standalone redevelopment proposals will be supported where they demonstrate high quality design, optimise site capacity, protect heritage assets and contribute to public realm improvements.”

This modification would:

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- Align with NPPF tests of soundness (effective and deliverable);
- Enable early investment in the Euston Growth Area;
- Avoid sterilisation of the Premier Inn site;
- Retain flexibility for comprehensive redevelopment should land assembly occur in the future.

Conclusion

The Premier Inn operator is committed to bringing forward investment that will:

- Intensify visitor accommodation in a highly sustainable CAZ location;
- Contribute to employment and economic growth;
- Improve townscape and public realm along Euston Road;
- Respect and respond to nearby heritage assets;
- Support the long-term regeneration of Euston.

However, policy must not implicitly condition development on comprehensive land assembly across multiple ownerships.

We respectfully request that Site Allocation 4.2 be amended to explicitly support standalone, operator-led redevelopment proposals.

Yours sincerely

[redacted]

Alex Neal
Partner

[redacted]