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Outlook

Response to Euston Area Plan update proposed submission draft 2026 from Regent's Park CAAC

From Richard Simpson [redacted]
Date Tue 03/03/2026 19:16
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

1 attachment (268 KB)
RPCAAC response to EAP proposed submission draft 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 Therese and Mary-Ann,

I attach the Regent's Park CAAC's response to the updated EAP. I hope it is legible: please let me know if anything is not clear.

All good wishes,

Richard
RPCAAC

[redacted]

The Regent's Park Conservation Area Advisory Committee

[redacted]

02 March 2026

The Regent's Park Conservation Area Advisory Committee's (RPCAAC) response to the Euston Area Plan Update Proposed submission draft 2026

Preliminaries

1. The RPCAAC's response is submitted by Richard Simpson, [redacted] (tel [redacted] : email [redacted]

2. The RPCAAC is a standing committee, currently of 11 members, which has met regularly every month since its foundation by the London Borough of Camden in 1983. Independent of the Council, the RPCAAC advises on all matters relating to the heritage of the Regent's Park Conservation Area. The RPCAAC includes members nominated by the Camden Society of Architects (RIBA), national amenity societies like the Georgian Group and Victorian Society, the Camden Civic Society, local residents' groups, and the Friends of Regent's Park and Primrose Hill.

3. The Submission Draft. Euston Area Plan was discussed at the RPCAAC meeting on 2 February 2026. This response was circulated in draft – with the EAP document itself – before our 2 March 2026 meeting, when it was discussed, reviewed in detail, revised, and unanimously agreed for submission.

4. I would be prepared to take part in the oral part of the examination if that were helpful.

5. The RPCAAC's submission on the Euston Area Plan 2026 is focused on our area of engagement, that is the Regent's Park Conservation Area and the areas and buildings adjoining which impact its heritage.

6. Our submission is in three main parts: on Tall buildings, on Design codes, and on the area known as Camden Cutting. A short further part lists some editorial corrections to the submission draft. We make 15 representations.

7. We have tried to address the submission draft in terms of its soundness.

Tall buildings

Representation 1 – 3.3 Design strategy – strategic principle EAP2 Design, bullet point 8 (p. 67)

RPCAAC states: We welcome and endorse the principle that buildings should respect the scale and character of existing buildings, context and local views.

Representation 2 – 3.3 Design strategy Building heights, massing and scale (p. 74 para 2)

EAP text: 'To the east of Park Village East and adjacent to the railway, there is potential for tall buildings up to approximately 38 metres high (12 storeys), …'.

RPCAAC states: No basis is given in the Plan for this assertion. The 'tall buildings' (plural) referenced are also not specifically identified with a more precise location although they are presumably to be identified with Site allocation EA6. Shown (Fig. 3.4) to be predominantly 6-10 storeys, EA6 on that plan has a single location for a taller building. In the EAP Background report Appendix 3 View 12 (pp. 243-244) this site has taller buildings visually represented at 12-16 storeys.

This unevidenced assertion and associated ambiguity both undermine the ability of communities to participate effectively in plan making (contrary to NPPF 16c) and undermine the protection and enhancement of our historic environment (contrary to NPPF 8c).

The view assessments should be opened to community engagement and the results used to modify the Plan.

Representation 3 – 3.3 Design strategy Building heights, massing and scale (p. 74 para 4)

EAP text: '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 … to not affect the setting of, and views within and of, nationally important heritage assets including Regent's Park and Chester Terrace.'

RPCAAC states: We welcome this clear statement.

Representation 4 – 3.3 Design strategy Building heights, massing and scale (p. 74 para 4)

EAP text: 'Likewise, tall buildings in other areas identified in figure 3.4 (such as Regent's Park Estate and Maria Fidelis) would need to consider potential impacts on the setting of these heritage assets.'

RPCAAC states: We refer to this statement in the light of EAP Background report Appendix 3 View 21 (pp. 257-258).

References to EA6, EA10 and possibly W/ASD1 identify 3 buildings on plan and in visualisation but others – 8 of the 9 proposed buildings visible over the roofline of the Terraces – are not identified.

This lack of identification both undermines the ability of communities to participate effectively in plan making (contrary to NPPF 16c) and undermines the protection and enhancement of our historic environment (contrary to NPPF 8c).

The view assessments should be opened to community engagement and the results used to modify the Plan.

Representation 5 – 3.3 Design strategy Building heights, massing and scale (p. 75 para 1)

EAP states: 'In addition to being of the appropriate height and in the right location, tall buildings must be of the highest architectural quality.' The understanding of the highest architectural quality can be referenced to statements in EAP Background Report. For example, in its 'Key Findings' on local views in Appendix 3 at p. 226, it states in bullet point 5: 'Taller buildings on site allocation EA10 (Regent's Park Estate) would impact on the view looking south east from the Broadwalk of Regent's Park, which includes the spires of St. Katharine's Danish Church, a Grade II* listed building (see View 20). The impact would be greater in the upper range where a building with a larger footprint was tested. Development proposals would need to consider potential impacts on these heritage assets and excellent design and careful modelling will be required.'

RPCAAC states: The commentary implies that 'excellent design and careful modelling' could mitigate the harm to this view. 'Excellent design and careful modelling' is frequently cited in similar contexts.

But we argue that View 20 suggests that it is the massing and height of the taller building that damages the historic views – at this distance it is doubtful whether design detail is legible. We have recent experience of this issue in our discussions with the developer of the Euston Tower (British Land).

The EAP seems to rely on unfounded assertion rather than evidence, and in doing so undermines the protection and enhancement of our historic environment (contrary to NPPF 8c).

These design assumptions should be opened to community engagement and the results used to modify the Plan.

RPCAAC concluding general comments on Representations 1-5:

We are very deeply concerned by the impacts of tall buildings on local views and heritage.

To our knowledge this aspect of the Plan (tall buildings analysis) has not been prepared with any direct detailed consultation with or input from our Committee, although the RPCAAC was established by Camden Borough to give advice on the conservation area and its range of heritage assets.

Given the emphasis in the NPPF at 16c on the importance of '… effective engagement between plan-makers and communities…' we question whether this aspect of the Plan can be regarded as consistent with national policy and so sound.

Given the importance of policies on tall buildings to the Regent's Park conservation area, we would be eager to take part in processes to make this aspect of the Plan sound.

Design codes

Representation 6 – 3.3 Design strategy – Design codes, p. 78 para 3

EAP text: 'The process of developing the Design Codes should be led by the developer in conjunction with the Council and stakeholders. It should be based on effective engagement with local communities about its content …' (our emphasis).

RPCAAC states: Limiting the contribution of communities to the 'content' is not consistent with the NPPF and is not sound. The NPPF 134 is more comprehensive and inclusive: '… all guides and codes should be based on effective community engagement …'.

Please modify the Plan by deleting the phrase about its content.

Representation 7 – 4.3 Places Camden Cutting – Design Code p. 169 para 1

EAP text: 'To support the masterplan for transport related development, a design code for development above and around the Cuttings should be developed…' (our emphasis).

RPCAAC states: Why the limitation 'for transport related development'? We urge a more inclusive statement, suggested wording 'To support the Masterplan for the Camden Cutting, …'.

Representation 8 – 4.3 Places Camden Cutting – Design Code p. 169 para 1

EAP text '[design code to be developed] … with effective involvement of local communities throughout the process.'

RPCAAC states: We welcome this formulation as consistent with NPPF 134.

Camden Cutting

Representation 9 – 4.3 Places Camden Cutting – p. 169 para 2

EAP text 'Park Village East should be extended to meet Hampstead Road …'

RPCAAC states: What does this mean? It is not identified on Figure 4.4 'Camden Cutting illustrative masterplan' at p. 165, nor on EA6 at p. 174. Lack of clarity undermines the protection and enhancement of our historic environment (contrary to NPPF 8c).

Please modify the Plan by deleting this statement.

Representation 10 – 4.3 Places Camden Cutting, p. 171 para 3

EAP text: 'Where it is not possible to deck over the cutting, the railway cutting should be able to be viewed from street level, through appropriately designed walls where compatible with railway safety and operations requirements.'

RPCAAC states: We argue that it is important to preserve historic Cutting enclosure walls from 1900-06 which are locally listed, contributing to the character and appearance of both Regent's Park and Camden Town conservation areas. This should be acknowledged in this text of the Plan to make this statement more accurate and complete and to support the protection and enhancement of our historic environment (consistent with NPPF 8c).

Modified EAP text to read: 'The railway cutting is enclosed by the locally listed 1900-06 retaining wall parapets, which should be retained. Where new enclosing walls are required, they should be designed where compatible with railway safety and operational requirements to allow views of the railway cutting from the street.'

Representation 11 – 4.3 Places Camden Cutting, p. 175 EA6 bullet point 7

EAP text '… and relevant local views.'

RPCAAC states: To make this statement more accurate and complete and to support the protection and enhancement of our historic environment (consistent with NPPF 8c) add 'including views of and from Regent's Park Conservation Area'.

Modified EAP text to read '… and relevant local views, <u>including views of and from Regent's Park Conservation Area</u>.' (our emphasis).

Representation 12– 4.3 Places Camden Cutting, p. 175 EA6 bullet point 9

EAP text 'Development must be designed to respond to the site's context including the nearby Regent's Park Conservation Area and the setting of listed buildings on the west side of Park Village East.'

RPCAAC states: Following the use of 'respect', rather than 'respond' in similar contexts at EA7 p. 178 bullet point 6 and EA8 bullet point 7, to achieve consistency and effectiveness in the Plan and to support the protection and enhancement of our historic environment (consistent with NPPF 8c) we urge the revision of this text as follows:

Modified EAP text to read: 'Development must be designed to <u>respect</u> the site's context including the nearby Regent's Park Conservation Area and the <u>adjacent / nearby listed buildings</u> and their setting on the west side of Park Village East, and to respect the amenity of neighbouring residents.'

Representation 13 – 4.3 Places Camden Cutting, p. 180 EA8 bullet point 1 'Context'

RPCAAC states: To make this statement of context more accurate and complete, and to support the protection and enhancement of our historic environment (consistent with NPPF 8c), we urge the addition, to the end of the last sentence of this paragraph, of the statement: 'to the east, and, to the west, the group of Grade II* listed villas of Park Village East in their landscape setting, part of the Regent's Park Conservation Area.'

Modified EAP text to read: 'The site is opposite a Grade II listed terrace (26-52, 53 and 54, 55 and 56 Mornington Terrace) to the east, and, to the west, the group of Grade II* listed villas of Park Village East in their landscape setting, part of the Regent's Park Conservation Area.' (our emphasis).

Representation 14 –4.3 Places Camden Cutting, EA8, p. 180 bullet point 3

EAP text 'Development should be contextual to the historic grain of Camden Town Conservation Area and adjacent / nearby listed buildings. Height of approx. 5 storeys.'

RPCAAC states: To make this statement more accurate (the '3-5 storeys for EA8 is taken from Fig 3.4 in the submission Plan), and consistent (with, for example EA7 p. 178 bullet point 6) and the Plan more effective, and to support the protection and enhancement of our historic environment (consistent with NPPF 8c), to revise this text.

Modified EAP text to read 'Development should be contextual to and respectful of the historic grain of Camden Town Conservation Area, ~~and~~ adjacent / nearby listed buildings, and the nearby Regent's Park Conservation Area. Height of approx. 3-5 storeys.' (our emphasis).

Representation 15 – 4.3 Places Camden Cutting, EA8 p. 180 bullet point 7

EAP text: 'Development must be designed to respect the locally listed Mornington Street Bridge including its Grade II listed stone pillars.'

RPCAAC states: To make this statement more accurate and complete and the Plan more effective, and to support the protection and enhancement of our historic environment (consistent with NPPF 8c) we urge the addition of '1900-06 railway retaining wall parapet'.

Modified EAP text to read 'Development must be designed to respect the locally listed 1900-06 railway retaining wall parapet, and Mornington Street Bridge including its Grade II listed stone piers.' (our emphasis).

Minor editorial corrections

1.5 Material weight of the document, p. 12 para 4 text '… Camden Council will be are the determining authority …' delete 'are'.

4.3 Places Camden Cutting, p. 172 para 7 text reads 'Additional funding may would be required …' (our emphasis). Delete either 'may' or 'would'.

4.3 Places Camden Cutting, p. 169 para 1 '… around the Cuttings …' correct 'Cuttings' to 'Cutting'.

[redacted]

Richard Simpson FSA, Chair RPCAAC

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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)
Title	MR	
First Name	TERRY	
Last Name	REID	
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.*

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

Part B – Please use a separate page for each representation

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

Name or Organisation:	

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

Please use the links below to view the documents:

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

Paragraph	4.2	Policy	EA4/EA5	Policies Map	EA4/EA5

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

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

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

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

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

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 building should be refurbed
It will block the natural light, and destroy the small area that we have of green space, nothing will grow.
There is no need for a huge building where it is not needed or required:
The Council did not inform the residence of this, they stated they did. +North Gower Street
The locality to Euston Road, is a desaster waiting to happen. More traffic and pollution in the area.
The local community will be ripped apart by the total disreguard of the locals.
The Council have spent a fortune on doing the Square up, gardens for the locals.
Plans should require assesment through indepat assesment, so no adverse impact on ~~rede~~ residence amenaties, daylight, sunlight, Privacy and wind impacts
only a retrofit should be done with the local Community in Mind.
The use of 250 Eostron Rd should be protected for use by the NHS and kept that way.
The building will be out of keeping with the area
The inclusion of Tolmers Square Hotel was not in the consultation (summer 24)
The needs of the Community is being ignored

(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.

(Continue on a separate sheet if necessary)

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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.*

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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:**	26/2/26

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Objection to the Euston Area Plan Update 2026

Site Allocations EA4 (250 Euston Road) and EA5 (Euston Square Hotel)

Summary

This submission formally objects to the proposed allocations for Sites EA4 (250 Euston Road) and EA5 (Euston Square Hotel) within the Euston Area Plan (EAP) Update 2026.

The proposals are unsound and unjustified and fail to meet the tests of legal compliance and soundness, particularly in relation to meaningful and lawful public consultation; climate and environmental sustainability; heritage protection; safeguarding essential NHS services and infrastructure, including parking; and the protection of residential amenity, families, children, vulnerable residents, and small businesses.

Without substantial modification — including retention and retrofit of existing buildings and the safeguarding of NHS infrastructure — the allocations should not proceed.

1. Failure of Meaningful and Lawful Consultation

The Euston Area Plan Update fails to meet statutory and best-practice requirements for meaningful public consultation. During the Summer 2024 public consultation, residents and businesses in Tolmers Square, North Gower Street, and surrounding streets, including residents of sheltered housing at 40 Hampstead Road, were not adequately or transparently consulted on the scale and nature of development proposed for Sites EA4 and EA5.

Key development parameters, including the introduction of a tower of up to approximately 75 metres at EA4 and a large office block of approximately 40 metres, were not clearly presented or consulted upon during the Summer 2024 consultation stage. These parameters represent material planning considerations with significant impacts on residential amenity, townscape, heritage, and community wellbeing.

The subsequent inclusion and scale of proposals affecting EA4 and EA5 therefore constitute a material change that was not subject to meaningful public engagement in accordance with the Council's Statement of Community Involvement or accepted plan-making practice. The consultation process is procedurally flawed and the Plan cannot be regarded as legally compliant in respect of these sites.

2. Unjustified Demolition of Viable and Valuable Buildings

250 Euston Road (EA4), completed in 1981, is a high-quality late-20th-century building with architectural and historic merit. Euston Square Hotel (EA5) is a recognised heritage asset that contributes positively to the historic character of the area. Both buildings are structurally sound, fit for purpose, and well suited to retention, retrofit, and refurbishment.

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

3. Failure to Assess Reasonable Alternatives

Reasonable alternatives to the proposed allocations for EA4 and EA5 have not been assessed, evidenced, or consulted upon. Retention, retrofit, refurbishment, and lower-scale redevelopment options have not been properly evaluated or compared against wholesale demolition and large-scale redevelopment.

The absence of an alternatives appraisal renders the EA4 and EA5 allocations unjustified and contrary to plan-making requirements, which require reasonable options to be tested and consulted upon before preferred approaches are selected.

4. Climate and Environmental Harm

The proposed demolition and redevelopment of EA4 and EA5 would result in significant and avoidable environmental harm, including a high quantity of up-front carbon dioxide emissions caused by demolition and new construction, ecological damage, and prolonged construction impacts such as noise, dust, vibration, and traffic disruption.

These impacts conflict with Camden's Climate Action Plan, national commitments to net-zero, and established best practice, which recognises that retaining and retrofitting existing buildings is one of the most effective means of reducing carbon emissions from the built environment.

The draft Camden Local Plan, submitted for examination in October 2025, includes a short section on the Euston Area Plan which refers to the provision of 'new and replacement employment space.' Notably, the Local Plan makes no reference to retrofit, reuse, or refurbishment. This wording implicitly assumes demolition and replacement as the default development model and demonstrates a lack of policy coherence with Camden's stated climate objectives.

5. Severe Impact on NHS Services, Operations, and Parking (EA4 – 250 Euston Road)

250 Euston Road is currently occupied by University College London Hospitals NHS Foundation Trust (UCLH) and supports services and operational functions directly linked to University College Hospital and the wider UCLH estate.

UCLH holds a lease on the building running until 2039, representing a further 13 years of secured occupation. The Trust has occupied the building for approximately 20 years and considers the site strategically essential. The existence of a long, unexpired lease substantially constrains the deliverability of the allocation.

Redevelopment would displace NHS functions, disrupt service continuity, and increase pressure on an already constrained hospital estate. No credible phasing, decant, or temporary accommodation strategy is provided.

The proposals would also result in the loss of vital NHS parking supporting staff working unsocial, night, and emergency shifts. No secured replacement provision is identified.

6. Harm to Residential Amenity, Families, Children, and Vulnerable Residents

Tolmers Square functions as a vital outdoor play, social, and community space for families and children in an area with limited access to green space. Overshadowing and overbearing development would significantly reduce daylight and sunlight, diminishing the usability of the square and negatively affecting health and wellbeing.

Residents of sheltered housing at 40 Hampstead Road would experience loss of natural light, increased noise and air pollution, and adverse impacts on physical and mental health.

7. Impact on Small Businesses

Tolmers Square supports a number of small, independent businesses that contribute to the local economy and community cohesion. Prolonged construction disruption, reduced footfall, noise, dust, and loss of daylight would place these businesses at risk.

The Plan provides no meaningful assessment of displacement risk and no mitigation or support strategy for affected small businesses.

8. Overdevelopment, Townscape, Heritage, and Green Asset Harm

The proposed height, scale, and massing at EA4 and EA5 are out of character with the surrounding context and would erode the historic character of the Drummond Street area. Heritage assets, mature trees, and established green spaces are placed at risk without clear protection or enhancement measures.

9. Assessment Against the NPPF Tests of Soundness

The EA4 and EA5 allocations fail all four tests of soundness set out in paragraph 36 of the National Planning Policy Framework.

Requested Modifications

Retain and retrofit existing buildings at EA4 and EA5
Maintain existing heights and scale
Safeguard NHS use and essential NHS parking at 250 Euston Road
Protect heritage assets, mature trees, and green spaces
Protect families, children, vulnerable residents, and small businesses in Tolmers Square
Undertake transparent and inclusive consultation before progressing further

Conclusion

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The EA4 and EA5 site allocations within the Euston Area Plan Update 2026 are not legally compliant and fail the tests of soundness. Without substantial revision, the proposed allocations should not proceed.

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Outlook

Fw: Objection to 250 Euston rd demolishion

From Therese Gallagher <[redacted]
Date Wed 11/02/2026 07:49
To Rachel English <[redacted]
Cc EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

Hi Rachel,

Found this in my junk folder - can you please log and send an acknowledgement with details of how to make a representation at this stage.

Thanks
Therese

Therese Gallagher
Euston Manager
Pronouns: She/Her

Telephone: [redacted]

From: Chris Roberts <[redacted]
Sent: Tuesday, February 3, 2026 17:42
To: Therese Gallagher <[redacted]
Subject: Objection to 250 Euston rd demolishion

You don't often get email from soundservuk@aol.com. Learn why this is important

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

Objection to Proposed Demolition and Redevelopment at 250 Euston Road

Dear Sir or Madam,

I am writing as a tenant of Tolmers Square directly affected by the proposed demolition and redevelopment of 250 Euston Road and the associated plans impacting Tolmers Square and North Gower Street.
This proposal cannot be considered in isolation. Our community has already endured years of disruption and environmental harm as a result of HS2 works and surrounding major developments in the Euston area. Residents have experienced the loss of mature trees, a reduction in green space, prolonged construction noise, poor air quality, and significant impacts on health and wellbeing. Further large-scale demolition and high-rise development would compound this cumulative harm and place additional strain on an already overburdened residential community.
Tolmers Square has a well-documented and important place in Camden's social and planning history. During the 1970s and 1980s, the area became a nationally recognised example of

R48 successful community resistance to large-scale redevelopment that threatened to demolish historic housing and displace residents. Through sustained action by tenants, artists, and local campaigners, Tolmers Square emerged as a model of community-led regeneration. This history should be respected and protected, not repeated or undermined by further overdevelopment that risks eroding the character and liveability of the area.

The proposed development raises serious concerns regarding loss of daylight and sunlight, overshadowing, overlooking and loss of privacy, increased wind impacts, and prolonged construction disturbance. These are material planning considerations with direct consequences for residents' health, wellbeing, and quality of life. Any development that results in demonstrable harm to residential amenity should be resisted.

I am also deeply concerned that tenants and residents have not been given sufficient notice or a meaningful opportunity to engage with this process. Genuine consultation must include those most directly affected. Limited notice and inadequate engagement undermine trust and prevent residents from properly understanding, responding to, and contributing to proposals that will fundamentally affect their homes and daily lives.

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

The Euston area is already subject to intense development pressure, including HS2 works and multiple large commercial and residential schemes. The cumulative impacts of these projects must be properly assessed and given full weight in decision-making. Regeneration should enhance communities, not overwhelm them or erode the very qualities that make neighbourhoods liveable.

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

Our homes, our health, and our community matter. I ask that the historic, environmental, and human impacts of this proposal be given full and serious consideration.

Yours faithfully,

Chris Roberts

[redacted]

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Euston Area Plan Update – Proposed Submission Draft 2026
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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	~~CHRIS~~ MR	
First Name	CHRIS	
Last Name	ROBERTS	
Job Title (where relevant)		
Organisation (where relevant	[redacted]	
Address Line 1*		
Address Line 2		
Post Town*		
Post Code*		
Telephone No.		
E-mail Address		

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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 [✓]

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.

PLEASE SEE ATTACHED

(Continue on a separate sheet if necessary)

R48

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.

PLEASE SEE ATTACHED

(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** ☑ **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:

[redacted] [redacted] .

, I WOULD LIKE TO EXPLAIN HOW THIS WILL AFFECT THE BUSSINESS', CHILDREN, + VUNERALE PEOPLE LIVING IN TOLMERS SQ, ~~AND~~ ~~TO~~ 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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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:**	1/3/2026

R49

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51-52 St. John's Square
London
EC1V 4JL

[redacted]

[redacted].gov.uk

Euston Regeneration,
5 Pancras Square,
London,
N1C 4AG

3rd March 2026

Dear Sir/Madam,

EUSTON AREA PLAN UPDATED (PROPOSED SUBMISSION DRAFT JANUARY 2026) – CONSULTATION
REPRESENTATIONS ON BEHALF SHURGARD UK LTD

I write on behalf of our client, Shurgard UK Ltd (Shurgard), to submit representations to the consultation on the 'Euston Area Plan Update'.

Shurgard is Europe's leading self-storage provider, operating a network of high-quality facilities across major cities within the UK. The company has been the occupant of 1 Stanhope Street, London NW1 3FL ("the Site"), which is located within the Euston Area Plan area, for the last two years (the Site was previously operated by another self-storage provider since 2020). This Site provides flexible, secure and affordable storage for small businesses, residents and tradespeople within the local area. As an interested stakeholder in the development of the Euston area, Shurgard is seeking to participate in the consultation to help inform the direction of the emerging plan update.

Background

Since 2015, the Euston Area Plan (EAP) has formed part of Camden Council's Local Plan. The Plan was jointly prepared by Camden Council, the Greater London Authority, Transport for London, Network Rail and HS2 Ltd to guide the redevelopment of Euston Station and the surrounding areas. It was also adopted as a Supplementary Planning Document to the London Plan in 2015. Specifically, the EAP identifies areas suitable for new development and sets guidelines for any redevelopment including design guides, land-use allocations, and standards for new open space and the public realm.

Paragraph 34 of the National Planning Policy Framework (NPPF, 2024) requires all Spatial Development Strategies and Local Plan policies to be reviewed every 5 years. In line with this, an update to the Euston Area Plan commenced in 2020, with a Regulation 18 consultation concluding in March 2023. In early 2023, the Government announced a pause to all works associated with the High Speed 2 (HS2) rail network. Following this announcement, a supplementary consultation was carried out in Summer 2024

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to present a new 'direction of travel' for the EAP Update. In October 2024, the Government confirmed that all-HS2 related works would resume. Subsequently, using the feedback from the previous consultations, the EAP Update was created and published on 13th January 2026. The document responds to the evolving spatial and redevelopment requirements arising from the Euston expansion and HS2 aiming to ensure that residents, businesses, community facilities, public realm and open space will be safeguarded and enhanced as part of any future development.

Response to Consultation Document

We have reviewed the document on behalf of Shurgard and provide comments below, in reference to the criteria set out in paragraph 36 of the NPPF for Plans (and other supporting planning documents) to be considered 'sound', if they are:

a) Positively prepared
b) Justified
c) Effective
d) Consistent with national policy

The following section addresses these points in relation to the following topics:

1) Redevelopment of Regent's Park Estate
2) Strategic Land Use Policy and Industrial Land Uses

1. Redevelopment of Regents Park Estate (EAP5 and EAP10)

'Development Principle EAP5: Regent's Park Estate' establishes the strategic principles guiding future development within this sub-area of the EAP. The policy focuses on the opportunities to accommodate new and replacement homes while providing wider environmental enhancements to improve the wellbeing of future or existing communities. These principles include improving the overall layout of the estate, enhancing open spaces, strengthening community safety, and ensuring clear boundaries between public and private areas.

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Figure 1: Regent's Park Estate illustrative masterplan

The illustrative masterplan accompanying Policy EAP5 reflects these objectives, identifying large parts of the estate for primarily residential uses and allocating specific sites for predominantly residential uses. Within this framework, the site allocation Regent's Park Estate North (EA10) **allocates the housing blocks (Cartmel, Coniston and Langdale), the Regent's Park Children's Centre, storage units, homes and shops** located on Stanhope Parade **for predominantly residential uses**.

Policy EA10 confirms that, alongside 'predominantly residential use', the Site is allocated for, self-contained homes, reprovision of community facilities, and retail uses. It does not reference the retention and/or re-provision of other existing uses within the Regent's Park Estate North, including the existing self-storage facility operated by Shurgard at 1 Stanhope Street.

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On this matter, Shurgard would make the following comments:

1.1 There is an acute and growing need for industrial land within London. The London Industrial Land Supply Study (2023) produced by the Greater London Authority identifies a sustained loss of industrial land reporting that between 2001 – 2020 London has lost 18% of its industrial land, with this rate of release accelerating further since 2015. Despite (or potentially because of) the decreasing number of industrial sites within London, the demand for industrial space has reached unprecedented levels across a variety of uses and unit sizes.

1.2 Further analysis by the Industrial Land Commission (2022) suggests that the overall loss of industrial land may in fact exceed this, estimating a reduction closer to a quarter (24%). Core industrial activities, which comprise general industry, light industry, warehouses, open storage and self-storage collectively account for approximately 6% of employment land in London and form a critical component of London's wider economic infrastructure. These uses particularly support the operations and facilitate growth of small and medium enterprises (SMEs).

1.3 At a borough level, the London Borough of Camden has released more industrial land than its 5-year benchmark guidance. As noted in a 2022 report by the Industrial Land Commission, this will have a knock-on effect on how well businesses within London can function and the wider economy. Any further loss of industrial land, particularly within central and accessible locations such as surrounding Euston Station, will exacerbate existing supply shortages and undermine the economic resilience of both Camden and London more broadly.

1.4 The London Plan 2021 acknowledges that the ongoing reduction of industrial land across London is likely due to the pressure for competing uses including residential developments on both designated and non-designated industrial land. Accordingly, Policies E4 through E7 of the London Plan seek to protect and retain the provision of both designated and non-designated industrial land.

1.5 In particular, Policy E7 relates to non-designated industrial land. It states that "development plans and proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land". Part B) of the policy notes that Development Plans should consider where industrial land can be consolidated and intensified to provide opportunities to support the delivery of residential and other uses. However, this must be part of a Plan-led process and ensure that there is no net loss of industrial land across the Local Plan area as a whole.

1.6 The retention of employment-led commercial uses is further supported by policies within both the adopted and emerging Local Plan. Adopted Policy E1 (g(i)) safeguards all existing employment sites that meet the needs of industry and other employers and as demonstrated, there is a clear

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need for industrial sites and last-mile logistics within these central areas of London. Emerging Policy 1E3 reinforces this position, stating that the Council will manage and protect the supply of industrial and warehousing land in the borough, recognising its value for a variety of business types, and the opportunity for some sites to be used more efficiently to deliver economic and wider Local Plan objectives.

1.7 Currently, Policy EA10 does not specifically provide for any re-provision of industrial floorspace at 1 Stanhope Street, which falls within the area designated for "predominantly residential development". As such, it will result in the loss of c..1,500sqm of industrial space. It is not considered that this has been sufficiently acknowledged or justified within the EAP. As such, it is not in accordance with Policy E4 or E7 of the London Plan, Policy E1 (g(i)) of Camden's adopted Local plan or Policy 1E3 of the emerging Local Plan.

1.8 Furthermore, the existing Shurgard facility at Stanhope Street demonstrably fulfils the core objective of Policy E4. Firstly, its PTAL 6a rating ensures a high level of accessibility for customers and businesses, while its proximity to Euston Station (approximately 950m) positions it within an area where industrial functions can operate efficiently alongside major commercial and residential uses.

1.9 The facility specifically provides the type of industrial and storage floorspace which Policy E4 identifies as essential to London's economy. Shurgard provides flexible, secure and affordable storage which accommodates a range of small businesses, residents and tradespeople within the local area. As such, the established use on the Site clearly makes a direct and positive contribution to meeting objectives of the London Plan. Therefore, it is considered that Policy EA10 should be amended to provide a more flexible range of uses, taking account of existing industrial uses which should be protected in accordance with London Plan Policy E7. The amended Allocated Uses within EA10 should therefore read as follows (changes in red, underlined):

> *"Predominantly residential use: permanent self-contained homes; reprovision of community facilities and related industrial uses and retail"*

1.10 Alongside safeguarding industrial land, Policy E4 of the London Plan confirms that, where the release of industrial land is necessary to achieve wider planning objectives, this should be undertaken through the processes of industrial intensification, substitution or co-location in line with Policy E7.

1.11 Recent evidence has demonstrated the potential for co-location to deliver both housing and industrial floorspace. Reviewing all co-location planning applications and masterplans referred to the Greater London Authority (GLA) between January 2019 to January 2022, Turley found that co-location has the potential to achieve a net increase of employment-generating floorspace of approximately 27% compared to the existing provision on individual sites. Within a more recent

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report from June 2025, the current pipeline projects a 53% increase in employment floorspace compared to the existing provision and through co-location. If implemented these schemes could generate £715 million gross value-added annually, support 8,500 direct jobs and provide homes for over 85,700 residents.

1.12 Turley's research in 2025 has shown that 70% of the approved schemes are showing signs of implementation through planning condition discharge or active construction. This demonstrates how co-location can successfully meet the housing needs of the borough alongside retaining existing designated and non-designated industrial land. As such, it is considered that the EAP Update should better align with the objectives of both the London Plan and Local Plan by retaining the established industrial use on the Site in a form of co-location or re-providing the use elsewhere as part of an industrial intensification.

1.13 As Paragraph 87 (b) of the NPPF also specifically notes that all planning policies must recognise the specific locational requirements of storage and distribution operations, Policy EAP10 should recognise the need to retain a B8 use in a highly accessible location. The EAP Update needs to ensure that its policies make provision for storage and distribution operations within its masterplan in suitably accessible locations and at a variety of scales.

1.14 Given the above, it is considered the proposed approach does not current meet the criteria to be 'sound' as per paragraph 36 of the NPPF. This is detailed within the below table:

Source	Requirement	The EAP Update	Satisfied?
Paragraph 36 of the NPPF	Positively prepared	The EAP Update fails to reference the established industrial use within Site Allocation EA10 and directs all redevelopment towards predominantly residential uses. This does not account for the acute need for industrial land within central London or within Camden.	X
	Justified	No assessment has been undertaken to show that reasonable alternatives, such as co-location on the Site or re-providing the use elsewhere within the EAP Update Masterplan as part of an industrial intensification, have been explored. These approaches have been shown to deliver additional employment floorspace while meeting housing needs to balance competing land-use requirements.	X
	Effective	The absence of a clear framework to re-provide the industrial floorspace undermines the deliverability of London Plan Policy E4 and Camden's industrial safeguarding policies.	X

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	Consistent with National Policy	Failing to re-provide or retain the establish B8 use, Policy EAP10 does not recognise the locational and accessibility requirements of storage uses needed comply with Paragraph 87 of the NPPF. Additionally, this is also inconsistent with the objects of both the London Plan and the Camden Local Plan. As the EAP Update constitutes an SPD to the London Plan and an additional Local Plan in Camden's Development Plan Documents, it should not conflict with the adopted strategic policies within these documents. Therefore, retaining or re-providing the established industrial use as part of the EAP Update is necessary to ensure conformity with the National, Regional and Local policies and ensure the EAP Update is 'sound'.	X

2. Strategic Land Use Policy and Industrial Land Uses (EAP1)

Strategic Principle EAP1 states that new development above and around Euston Station should optimise the potential to create a major new economic hub of new commercial, knowledge based, science and creative sector industries to reflect the Knowledge Quarter ambitions for the area. While the appropriate mix of uses will accommodate residential development, Policy EAP1 acknowledges the need for between 215,000sqm and approximately 370,000sqm of employment floorspace across the Euston area including replacement floorspace. The illustrative land-use masterplan shows how the majority of this employment floorspace is to be focused above and around Euston Station and prioritise the Knowledge Economy.

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Figure 2: Overall land use strategy for Euston

In relation to other employment uses, Policy EAP1 states that other employment uses will only be supported where it is shown that these reflect the current and emerging needs of the knowledge economy. This does not provide clarity of the role of designated or non-designated industrial land in the EAP Update or the role of warehouse and storage uses (Use Class B8) within this employment strategy.

On this matter, Shurgard would like to make the following comments:

1.1 While the prioritisation of uses supporting the Knowledge economy is supported, as currently drafted Strategic Policy EA1 restricts support for other forms of employment uses unless they can be shown to '*reflect current and emerging needs of the knowledge economy'*. This approach prejudices the retention of existing industrial uses within the Euston Area.

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1.2 By narrowing the scope of the acceptable employment uses to only those directly associated with the Knowledge Economy, Policy EA1 overlooks the integral contribution that industrial uses make to London's wider economic system. As stated above, this conflicts with the acute identified need for industrial land within London and the national and regional policies trying to protect this type of land. As this is the key strategic policy underpinning the EAP Update, it is critical that it reflects the objectives of adopted policies. Therefore, it is considered that Policy EAP1 should be amended to support a wider range of employment uses that are needed. The amended wording on Section C of Policy EAP1 should therefore read as follows (changes in red, underlined):

1.3 *"Other employment uses will be supported where it is shown that these reflect current and emerging needs of the knowledge economy and supporting employment infrastructure."*

1.4 Additionally, given the scale of employment spaces required across the Euston area, there is a clear potential for a more diversified employment strategy that accommodates retention of existing industrial uses alongside the knowledge economy priority uses. This would better align with the EAP Update with London and Camden's economic objectives and ensure that employment provision is both robust and deliverable across the plan period.

Summary

Shurgard's comments in response to the consultation on the draft EAP Updated are set out in full throughout this letter. The key matters that Shurgard request consideration of in the next stage of preparation of the emerging EAP Update (including the forthcoming Examination) and in order to ensure Soundness are:

- The EAP Update should recognise the importance of retaining and intensifying existing industrial sites, in accordance with relevant Local Plan and London Plan policies, to ensure that Camden maintains a sufficient supply of land for industrial uses to support the local economy.
- Site Allocation EA10 fails to identify the existing industrial use at 1 Stanhope Street or to designate any land within the sub-area for industrial uses. As such, it is likely to result in a net loss of industrial floorspace.
- This fails to comply with the existing policies of the London Plan or the adopted or emerging Camden Local Plan.
- Alternatives such as co-location and industrial intensification should be considered as part of the EAP Update as an effective means of retaining industrial floorspace while meeting other needs including the need for new homes.
- While it is recognised that the EAP Update seeks to support knowledge-based economy uses, this should not comprise the sole employment use that is permitted within the Euston area. Strategic Principle EAP1 should be amended to better reflect a range of employment uses, including that related to the knowledge economy, but with complementary uses encouraged.

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Shurgard and ROK Planning welcome further discussion on all points raised in relation to the progression of the EAP and hereby reserve our position to be amplified at the forthcoming Examination in Public.

If you require further clarification or wish to discuss this further, please do not hesitate to contact either Millie Mackenzie [redacted] Wilf Foster [redacted] or myself at this office.

Yours faithfully,

[redacted]

Alun Evans
Director
ROK Planning Ltd
[redacted]

Outlook

Euston Area Plan Update Representations (Shurgard)

From Millie Mackenzie <[redacted]
Date Tue 03/03/2026 17:50
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>
Cc Alun Evans [redacted]; Wilf Foster [redacted]
[redacted]<[redacted]; Jill McGregor <Jill.McGregor@camden.gov.uk>; Therese Gallagher <[redacted]

1 attachment (433 KB)
260219 - EAP - Reps Shurgard - 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.

Good afternoon,

Please see attached representations in response to the Euston Area Plan Update Proposed Submission Draft.

I'd be grateful if you could confirm receipt of the attached and let me know if you require anything further.

Kind regards,

ROK PLANNING

Millie Mackenzie
Assistant Planner
[redacted]
www.rokplanning.co.uk
51-52 St. John's Square, London, EC1V 4JL

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[redacted]

R50

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

R50

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

R50 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.

1. Camden Council has not consulted the community about the proposed plans

2. The proposal would have an unacceptable impact on local residents in terms of disruption, loss of light and privacy, negative impact and overshadowing of an important public open space.

3. The demolition of a fit-for-purpose building is not permitted under Local and National planning policies which require that existing buildings are retained where possible on grounds of sustainability. The proposed demolition and construction of a new building would cause an unacceptable quantity of Greenhouse Gas emissions that is incompatible with Camden's and the UK's climate commitments.

4. The proposal would cause heritage harm to the Euston and Bloomsbury areas.

The draft Euston Area Plan also includes the redevelopment of the Euston Square hotel at the north end of Gower Street. This would result in the unnecessary demoliton of a historic building and further harm to North Gower Street.

(Continue on a separate sheet if necessary)

R50

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.

Do not make any changes!

Keep everything as it is.

There can be internal refurbishment for improvement but no external ~~efforts~~ changes of the structures.

(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.*

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☑ **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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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.

11. Signature:	[redacted]		**Date:**	03/03/26

R51

Outlook

Euston Area Plan consultation response

From Slaney Devlin <[redacted]
Date Tue 03/03/2026 16:56
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

2 attachments (372 KB)
EAP-Update-Consultation-Response-Form-3.pdf; EAPresponse_SD_3.3.26.pdf;

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

Dear EAP team,

Apologies, I could only input on some of the boxes on the pdf, so have responded to questions 6 and 7 in a separate document. Hope that's OK.

Best,

Slaney

R51

Euston Area Plan Update – Proposed Submission Draft 2026
Representation Form

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Post to: Euston Regeneration Team, Camden Town Hall, Judd Street, London, WC1H 8EQ.

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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	Mrs	
First Name	Slaney	
Last Name	Devlin	
Job Title (where relevant)	Chair	
Organisation (where relevant)	Somers Town Neighbourhood	
Address Line 1*	[redacted]	
Address Line 2		
Post Town*		
Post Code*		
Telephone No.	[redacted]	
E-mail Address	[redacted]	

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: Somers Town Neighbourhood Forum

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	3.6	Policy	EAP5	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	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)	
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)

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	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:

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:	Slaney Devlin	**Date:**	3 March 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.

Question 6
The submission draft is clear that the community has consistently prioritised replacement and new open spaces, and acknowledges the unprecedented loss of open space in the area due to HS2.

Policy EAP5 requires a Public Open Space and Infrastructure Strategy for the area above and around the station, but does not require that strategy to extend across the EAP area.

All existing housing and the vast majority of future housing is outside the "area above and around the station". Understanding the existing open space needs within our estates, and the additional need for open space required by a substantial number of new homes within our estates is vital. Additional public open space and play space attached to new development cannot be replaced by green infrastructure – we need both.

The Euston Area Plan is constantly having to adapt to changing requirements from government and this means supporting documents are often out-of-date before they are even produced. Chapter 3.6 references HS2's Environmental Statement, produced in 2013. The ES is based on a scheme that was out-of-date by the time it reached the House of Lords. Mitigation in the ES assumes works will be finished in 11 years or 2026.

During examination by the Lords, HS2 acknowledged additional open space could be lost, including part of the station piazza, and these figures need to be recognised when calculating the amount of replacement open space required, before looking at the quantum of additional space needed for new development.

The Open Space Study (2020) is also outdated, including as it does the Story Garden (now a building site) in its calculations as well as an open space north of the station (now discarded). What it does show, however, is that there will be an unprecedented increase in population in the area during the lifetime of this plan, and that the population locally is ageing.

Many of the site allocations for housing within the plan are sited near existing open spaces and do not mention open space in their descriptions. In a densely populated area with few private gardens and an acknowledged lack of open space, particularly east of the station, additional homes need to deliver additional private *and public* open space. The Royal Mail site borders Ampthill Estate and includes 140 new homes, with no mention of open space; The Place & Premier Inn includes 125 homes and mentions improvements to the public realm, but not new open space. It is opposite St Pancras Church and gardens; the Euston Circus Building site allocation includes part of the only public open space in that part of Euston – 115 new homes, with a requirement to improve the public realm; opposite is the Euston Square hotel – 20 homes and a requirement to improve the public realm; within the Somers Town Neighbourhood Plan area, Ampthill Estate, 120 new homes and a direction to minimise the impact on the existing open space.

Finally, since the works at Euston have begun we have learnt that a) many residents can't walk far and rely on buses to get to the GP surgeries or shops and b) one in three households include someone disabled under the Equality Act. In Regent's Park Estate and Somers Town we cannot over-densify our estates assuming people will be able to escape to Regent's Park or Hampstead Heath if only there was improved east-west connectivity. Just as we need frequent and functional bus stops on our roads, we need sufficient local/doorstep green spaces for our mental and physical health and wellbeing.

Question 7
Two modifications would help:

The Public Open Space and Infrastructure Strategy needs to cover the entire EAP area (or a separate and complementary strategy needs to address open space outside the station area).

Each site allocation should stipulate the quantum and quality of new open space required.

R52

Outlook

Consultation on Euston Area Plan Update - Proposed Submission Draft

From Mark Furnish [redacted]
Date Mon 02/03/2026 16:31
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

1 attachment (134 KB)
20240828 Euston Area Plan Consultation.msg;

[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 Team,

EUSTON AREA PLAN - PROPOSED SUBMISSION DRAFT

Thank you for consulting Sport England on the above. As highlighted in Sport England's comments to the previous draft, Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of National and Local Planning Policy. It aims to ensure positive planning for sport and creating opportunities for physical activity for all sectors of the community. Further detail on Sport England's role and objectives within the planning system can be found at https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport

Sport England has considered the proposed submission draft against its policies and objectives and consider its previous comments are still applicable. These are attached for convenience.

If you have any questions, or would like any further advice, please do not hesitate to contact me.

Yours Faithfully,

Mark Furnish
Planning Manager
[redacted]

Sign the Going for Green Pledge to tackle climate change and sustain grassroots sport for the next generation

Sport England, Sports Industry Awards 2025 winner for Environmental Sustainability

[redacted]

[redacted]

R52

'Sport England was recognised for its work in leading the sport sector to promote environmental sustainability and net zero, through both its Every Move strategy and innovative campaigns and advocacy.'

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[redacted] R52

From: Mark Furnish
Sent: 28 August 2024 12:42
To: eustonareaplan@camden.gov.uk
Subject: Euston Area Plan Consultation

Dear Euston Team,

EUSTON AREA PLAN

Thank you for consulting Sport England on the above.

As I am sure you are aware, Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of National and Local Planning Policy. Sport England aims to ensure positive planning for sport and creating opportunities for physical activity for all sectors of the community. To achieve this aim our planning objectives are to protect facilities from loss as a result of redevelopment, enhance existing facilities through improving their quality, accessibility and management and to provide new facilities that are fit for purpose and meet demands for sport participation and physical activity now and into the future. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields. Further detail on Sport England's role and objectives within the planning system can be found at https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport

Active Design

Sport England support elements that appear throughout the document, including facilitating/improving active travel infrastructure, creating and improving public realm, improving connections, creating 'green streets', considering 'Healthy Streets' and others. These aspects have a close synergy with Sport England's Active Design guidance which shows how designing spaces and places can support and encourage physical activity.

Sport England, working with Active Travel England and the Office for Health Improvement and Disparities, have produced the 3rd version of 'Active Design' (May 2023), a guide to planning new developments that create the right environment to help communities to get more active and improve the local population's health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England recommends that the Council seek to improve the health and wellbeing of the area by having clear references to Active Design, its Principles and the Active Design Checklist within the Area Plan. Active Design principles and the checklist, for example, could be added to the design requirements for sites/land allocations or an embedded

throughout the document so that activity would be 'designed in' to the area. More information on Active Design, including the guidance, can be found at https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design

Increase in Demand

The Area Plan seeks to provide additional residential accommodation the occupiers of which will generate demand for sporting provision. The existing provision within the area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Sport England, therefore, considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as a robust and up-to-date Playing Pitch Strategy and Built/Indoor Sport Facility Strategy which the Council, unfortunately, currently do not appear to have. Sport England encourages that the Council consider developing such strategies to inform the Area Plan and the emerging Local Plan to ensure that the documents would be sound. More detail on how to develop such Strategies can be found at https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport?section=assessing_needs_and_playing_pitch_strategy_guidance

Loss of Facilities

It is not clear from the Area Plan, however if the land allocations or development outside the land allocations would result in the loss of sport and recreation facilities, these should be replaced prior to the loss to ensure the local communities have access to facilities where they can be active. Any permanent loss of facilities could be considered contrary to National Planning Policy unless the facilities is robustly identified as surplus to current and future local need.

I hope the above is of assistance. If you have any questions or would like any further advice, please do not hesitate to contact me.

Yours Faithfully,

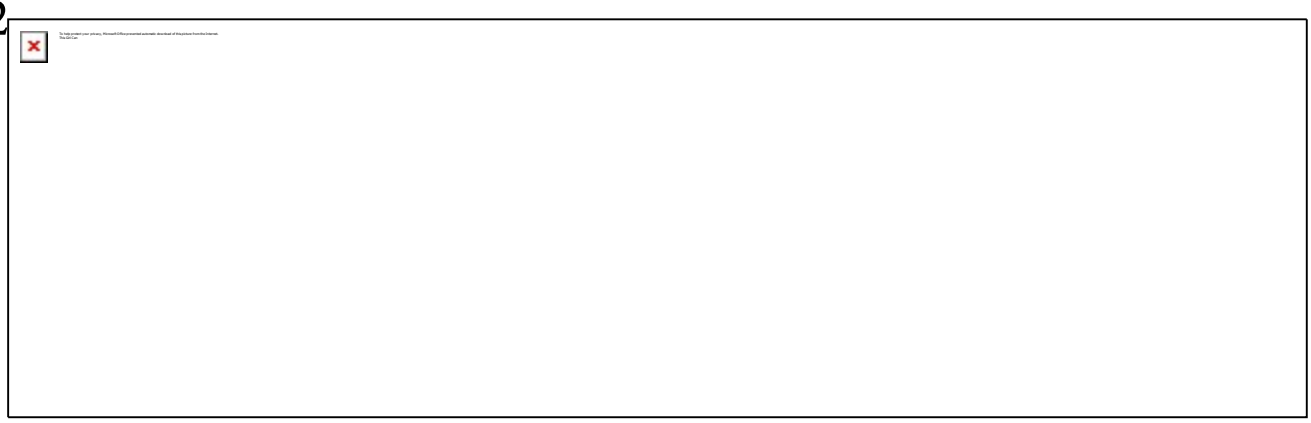
Mark Furnish

[redacted]

Planning & Active Environments

[redacted]

R52



[redacted]



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R53

[redacted]

From: Gregory Barrett [redacted]
Sent: 03 March 2026 20:03
To: EustonAreaPlan
Cc: Oliver Caroe; Rebecca Thompson; Brennan, Tim; Rachel English; Therese Gallagher
Subject: EAP Regulation 19 Comment
Attachments: 260303_EAP Letter of Response Regulation 19_with enclosures.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 Plan Team,

I write on behalf of Oliver Caroe, Surveyor to the Fabric of St Paul's Cathedral. Please find attached comment on the Regulation 19 version of the Euston Area Plan.

Kind regards,

Greg

Gregory Barrett
BA (Hons) MPhil (Cantab) FRSA IHBC
Lead Heritage Consultant and Clerk to the Surveyor
Mobile: [redacted]
on behalf of Caroe Architecture Ltd

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Cambridge Office:
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CAROE ARCHITECTURE

Surveyor to the
Fabric
The Chapter House
St Paul's Cathedral
St Paul's Churchyard
London EC4M 8AD

[redacted]

Euston Area Plan Team
London Borough of Camden
Sent via email only

3 March 2026

Dear Euston Plan Team,

Regulation 19 Letter of Response: Euston Area Plan

This letter has been prepared on behalf of the Dean and Chapter of St Paul's Cathedral as a response to the Regulation 19 draft of the Euston Area Plan.

We thank Camden Council for the recent meeting held with us on the EAP, and the follow up discussion with your urban design and 3D modelling staff regarding your VuCity visualisation tool.

Like any plan, the EAP includes extensive information and is supported by a broad evidence base. Much of this information lies beyond the scope of the Cathedral to comment upon. We do, however, have some comments and queries regarding the understandings upon which the EAP is based, the limitations to some of the analysis that underpins the EAP, and gaps in the present evidence base. Likewise, this letter does not attempt to offer a deep-dive into the plan-making process. Instead, it outlines the key queries we have of the Euston Area Plan team that we hope will be addressed and answered as part of this consultation response.

Previous Representations

The Cathedral previously provided comment on the draft Euston Area Plan in 2023 (letter attached). Whilst the quantum of development has changed since 2023, the letter outlines the sensitivity of the location in terms of the heritage significance and landmark value of St Paul's Cathedral. It also outlines the nature of our concerns with the potential for harmful development in this area.

Comment on Regulation 19 EAP

Our comment has been framed in line with paragraph 36 of the NPPF regarding the soundness of a plan. We have therefore noted where our concerns relate to the positive preparation of the plan, the justification for the policies, any concerns as to how effective the plan would be, and the consistency of the plan with national policy.

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Methodology of The Jelly Mould

There are multiple LVMF views and height constraint planes of relevance to St Paul's that cross the EAP site. These have a bearing on the role St Paul's plays as part of these views. They also have a bearing on its heritage significance of the Grade I listed Cathedral, and the way this significance can be appreciated.

As we understand it, the 'Jelly Mould' used by Camden to inform building heights across the EAP area is the latest that has been supplied by the GLA and their expert advisors. However, we cannot verify the methodology, and the Camden modelling team did not know for certain the provenance of this data. In summary, as we understand it there is a (in broad terms) a constraint plane at circa 80m AOD (this does vary across the site and development area). We understand that pavements are at circa 20m AOD, allowing for buildings up to the region of 60m in total height above ground level. However, there are of course further nuances that are reflected in the Jelly Mould itself, given the overlapping nature of multiple view constraints across the plan area. The planning team will of course be aware of the need for both the constraints and schematic development envelope proposals to be accurately reflected in the modelling that supports the EAP. An error in either would lead to an unsound plan.

The Euston team will also be aware of the forthcoming changes proposed and emerging for the GLA's LVMF. We ask whether the latest emerging LVMF has been used to create the jelly mould and test the views? Given that the LVMF review is currently emerging, we suggest that the current adopted policy should be the basis for plan-making, but that some mechanism will definitely be needed in the plan to take account of potential changes.

The supporting text to Strategic Principle PA2: Design notes '*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*.' We would note the potential for adverse impact in views, when assessed qualitatively, even when planes are not specifically breached. We consider this needs further investigation.

In addition, given the EAP specifically references the LVMF, ensuring that the methodology used to create the Jelly Mould fully aligns with the LVMF is therefore essential to the justification for the plan, especially as these are parametric constraints that are expressed in the EAP as absolute building heights. The plan-making team will understand that misalignment with strategic views protection policies would also undermine the effectiveness of the plan.

The Jelly Mould and Indicative Development

The exact relationship between the 3D modelling used to support the policy and the Jelly Mould is unclear to us, as noted above. We have been assured within meetings that the development envelope proposals do not breach the mould (and this is inferred in the EAP text), and that those breaches shown in depictions are the result of graphic errors. We seek to have this confirmed. We also stress that the LVMF policy is not only a parametric tool but requires qualitative analysis of proposals which are tested in views. There is very little assessment within the evidence base as we understand the data published. Any discrepancy of parameters has the potential to undermine the evidence base; but so too can qualitative factors have a harmful impact and result in inappropriate development. We consider that this has clear implications for the justification and effectiveness of the plan.

Parts of the evidence base discuss upper and lower brackets for capacity development. From our discussions, we understand that it is the lower bracket that has informed the ultimate EAP policy constraint. We seek to have this confirmed, and reassurance that the lower bracket represents the upmost limit of the development that would be permitted by the policy.

Figure 3.4 is essential in understanding the development the plan may enable. We query the relationship of this diagram (especially those 'indicative' or 'potential opportunities' for tall buildings) and the modelling and VIA used to justify the plan.

In addition, our discussions explored how that the modelling provided is only based upon capacity; no other urban design, streetscape or environmental considerations have influenced the modelling. Whilst these factors may be emerging within a masterplan – which we understand is being instructed in parallel – the planning team may recognise that there could be potential to undermine the justification for the plan.

Heritage Specific Assessment

The evidence base includes some acknowledgement of visual impact (see our comments below). However, we note the plan policies are not underpinned by specific heritage assessment that includes the Cathedral, distinct from visual impact assessment, and prepared in line with an appropriate methodology that centres heritage significance.

We have concerns that this is an essential part of the evidence base that is partial or missing, thus affecting the justification of the plan and meaning it has not been truly positively prepared. We also have concern that the plan may not be effective if it permits development that may give rise to heritage impacts, if that has not

been accounted for at a plan making stage. We suggest that the *St Paul's Cathedral Setting Study* could be used and referenced in policy wording as part of this evidence base.

In general, we would also recommend greater specific discussion of heritage impacts within the policy wording and supporting text.

A Full Understanding of Visual Impacts

We have not seen a detailed baseline assessment of all views to strategically important landmarks within the evidence base. Whilst an 'initial, high-level' appraisal of visual impact is given in Appendix 3 of the Topic Paper, this does not provide a great deal of qualitative assessment to fully understand impacts, also a noted above. This is a concern related to justification, but also with the efficacy of the plan – if development permitted by the plan would cause conflict with other policies.

We have only briefly reviewed the views themselves. However, we are concerned regarding impacts in relation to the 3D modelling in LVMF views. This extends to the wider setting and backdrop consultation areas of the views. Techniques such as 'shadowing' do not mean the visual impact is always nil. The quality of the views used in the evidence base currently means that it is also hard to discern impacts.

Furthermore, there are opportunities to enhance or repair detriments to these views. We suggest that some expert analysis to specifically define these opportunities and make them policy would be desirable, and lead to the plan being both more effective and truly positively prepared.

An example is 1 Euston Square. The assessment states: *'Lower massing envelopes fall within the envelope provided by the GLA's 'jelly mould'. The tested upper massing envelopes include the impact of potential height replacing the now demolished 1 Euston Square. While this goes above the jelly mould, it would represent an improvement on the pre-existing situation.'* Whilst we agree with this premise, we consider that the lowering of development at 1 Euston Square to within or below the Jelly Mould would cause a more favourable, and truly positive, outcome for development.

A key issue, which is unclear to us in your consultation, is whether you will be expecting/requiring the 1 Eversholt Street tower to be replaced. We hope the answer is yes and there will be benefits arising.

Relationship of Policy and Masterplan

We understand that the masterplanning of the area is either underway or anticipated to begin soon (and there is also the challenge of concluding a viable

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design for the HS2 station to follow). *Strategic Principle EAP 2: Design* anticipates this, noting the role of design codes for certain parts of the EAP site, and the work of the Master Development Partner in delivering such detailed work. However, the masterplan has obvious implications for the entirety of the EAP site.

To be effective, and truly positively prepared, this masterplanning exercise must work in lockstep with the EAP. Ensuring the EAP has very clear parameters would greatly assist in this regard.

We suggest that the wording of the policies should be reinforced (and echo that within the LVMF), clearly noting where unacceptable development would be refused (regardless of other benefits).

Policy in Action

It is vital that EAP policy requires that, as development comes forward, Camden will require developers and design teams to use the state of the art 3D tools and modelling and specialists that are well versed in both the parametric/geometric tools and with the expertise to undertake assessment. Parameters should allow for curvature of earth and accurate viewing corridor planes. This is inferred in the text relating to the requirement for AVRs but should be more explicit.

Each development proposal needs to be assessed on its merits – allowing for stepping or forming of building forms appropriately to context. We therefore suggest that early pre-application examination of constraints, with proven and accurate assessment tools, should be defined in policy. If the policy more tightly defines methodology and expectations for bringing forward development proposals (both in relation to masterplanning and specific applications for approval) the overall plan will be more effective.

It is equally important that policy defines an expectation that development proposals are brought forward with appropriate qualitive evaluation of visual impact, and heritage impact, noting the difference in these methodologies and outcomes. The policy expects this already, but the expectation should be reinforced (see also 'heritage assessment' above).

Conclusion

To conclude, we have some concerns with the justification for the plan, that may give rise to complications regarding case-by-case development that would harm its efficacy. We consider that, to be effective and truly positively prepared, the evidence base should take into account heritage significance

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R53

We hope that this is a consultation response that furthers the shared aims of the London Borough of Camden and St Paul's Cathedral for the sustainable growth of London. We greatly appreciate your approach to this consultation.

Yours sincerely,

[redacted]

Oliver Caroe; RIBA AABC
Surveyor to the Fabric of St Paul's Cathedral

For and on behalf of Caroe Architecture Ltd

cc: *Rebecca Thompson, Director of Property, St Paul's Cathedral*
Historic England
Encl: *Previous Representations on EAP, February 2023.*

Directors:
Oliver Caroe RIBA AABC
Mark Hammond RIAS RIBA AABC

Associates:
Touseer Ahmad AABC CEPH
Helen Bradbury IHBC
Matthew Cox RIBA CA MAPM
Gethin Harvey ARB
Alice Milligan RIAS RIBA AABC
Andrew Senior ARB

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R53

Surveyor to the
Fabric
The Chapter House
St Paul's Cathedral
St Paul's Churchyard
London EC4M 8AD

[redacted]

21 February 2022

The Euston Area Plan Team
London Borough of Camden
Sent via email only

Dear Members of the Euston Area Plan Team,

London Borough of Camden – Euston Area Plan Review Consultation Response

I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding our response to the recent consultation by the London Borough of Camden regarding the Euston Area Plan Review.

Introduction

Many thanks for providing the opportunity to respond to this public consultation. Given the potential implications for St Paul's Cathedral (principally the alteration of key LVMF views towards the Cathedral from three aspects) we would have welcomed a direct approach from the plan makers to discuss the plan. We hope that, by this introduction and comments, we can work more closely with the evolving plan and in collaboration with Historic England, the City and GLA. We share a good working relationship with officers in many boroughs, and welcome constructive conversation on the way London develops into the future.

We have collated our responses to the various aspects of the Area Plan Review below under key themes. It is not our intention to provide in depth comment on the depth and breadth of the emerging review. We have therefore only focussed on the key, broad matters that have implications for the public enjoyment of view of St Paul's Cathedral, which are designated in the LVMF.

Alteration of Protected Vistas to St Paul's Cathedral

First and foremost, the plan area lies within five landmark viewing corridors as identified within the LVMF, three of which are specifically focused on St Paul's Cathedral as a Strategically Important Landmark. These views allow for an appreciation of the exceptional significance of the Cathedral as a Grade I listed building in the wider setting of London for all of Londoners. As the LVMF clearly describes, these are universal values by which the identity and value of the UK's capital city is perceived and experienced.

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View 4A.1 stretches from Primrose Hill to St Paul's and behind. The landmark viewing corridor runs through the heart of the Euston Plan Area, and is buffered on each side by the wider setting consultation area, as it lies in the middle ground of the view.

Also affected is view 6A.1 from Blackheath to St Paul's and 5A.2 from Greenwich Park. The plan area lies in the backdrop of these protected view. Nonetheless, alterations to this backdrop clearly have the potential to affect the significance of the Cathedral. The Greenwich Park view especially has safeguarded the legibility of St Paul's against a clear open sky.

We note that these views are acknowledged within the emerging Area Plan, specifically within figure 3.4 on page 67. We welcome the multiple references in the document to compliance with the LVMF and with regards to preserving the significance of built heritage assets. Even so we have a number of concerns with the outlined development heights and the potential areas for tall buildings, which are discussed below. There appears to be a dissonance between the espoused requirement for the plan to fully comply with the LVMF and the areas and heights of desired development.

Indicative Locations for Tall Buildings



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We understand that the masterplan outlined in Fig. 3.4 (above) is indicative only, and at this stage, illustrative or aspirational. However, the proposed location for tall buildings within the plan will be of great concern to the planners and public due to potential visual and heritage impact.

We welcome that no "tall buildings" are proposed within the landmark viewing corridors as defined by the LVMF (as is required by the LVMF SPG). However, the illustrative masterplan clearly indicates proposed tall buildings within the wider setting consultation area of view 6A.1 and 5A.2 from the south. Within these views, any tall building would appear in the backdrop of the Cathedral, and have great potential to visually compete with the Grade I listed building and potentially cause significant – if not substantial - heritage harm. It is unclear from the level of information provided what the impacts would be, however these views allow for an appreciation of some of the key forms and features of special interest of the Cathedral at high level.

Tall buildings are also proposed to the very edges of the wider setting consultation area for the foreground/middle ground of view 4A.1. The plan also does not appear to fully acknowledge that the policy seeks to 'preserve and enhance' these views. Therefore the removal or mitigation of existing harms – especially in the foreground from Primrose Hill – is a gap in the policy making that we would be glad to discuss.

One of our primary concerns and observations is that the level of information and analysis provided for this consultation cannot confirm these impacts and where the policy aspirations are achievable and where not. Tall buildings in the areas shown will have the capacity to markedly compete with the visual prominence of the Cathedral in this area, or as we have seen elsewhere, potentially "canyonise" the view.

Our observation is that the Area Plan would evidence led – with close and detailed new analysis of the significance of the views as existing and then to closely appraise the potential impacts of the emerging plans, so that the Plan undertakes an extensive weighting exercise of harms which is arrived at consensually and transparently, with input from specialist consultees.

While we of course welcome the demolition of existing poor quality tall buildings that intrude into these views (in line with the LVMF SPG) the new tall buildings that may be constructed within the plan area have significant implications for actual significant visual and heritage harm to the protected views of Cathedral, which are preserved for all of Londoners. Without an evidence base, we and other concerned regulators must query whether these are appropriate locations for tall buildings at all. We would request that, if the plan is to move forward, a prerequisite would be that additional

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assessment is undertaking showing potential visual impact through massing studies. All the digital architecture tools are readily available to undertake this assessment. The City of London has a very well developed Vu City Model and a clearly articulated set of constraints, which can then inform the essential (and transparent) definition of overall site capacity, and very specifically locate where tall buildings can be located and their overall, specific heights.

We would also hope to see how the other, lower buildings may affect these views, especially as these lie within the viewing corridors. This is also difficult to ascertain through the heights plan provided. Even the lower buildings may intrude on an ability to appreciate the significance of the Cathedral?

In summary, we understand that this is a working review and a relatively high level plan. Our comments are, of course, based on text description and an indicative masterplan. However given the potential implications for the LVMF views of the Cathedral, we would request that massing modelling and constraints assessments are make – clearly evaluated at detailed significance analysis - to allow for a greater understanding of potential impacts and if this is truly the right location for buildings of this magnitude.

Level of Assessment and Consultation with the Cathedral

We also wish to raise specific concerns over the reference within parts of the plan documents concerning new tall development in the shadow of St Paul's (i.e. occluded by the dome). While this approach is possible (indeed, it has been undertaken elsewhere) it requires extensive assessment and design development and, in our experience, meaningful engagement with stakeholders, with an appropriate evidence base. Again, we would recommend that massing and views studies are undertaken to demonstrate this potential. This approach is also site specific, and must ensure that the LVMF views of the Cathedral are not compromised in other viewpoints. This echoes our previous point above – given the constraints of the plan area, is this the right location for buildings of this height?

We welcome the reference throughout the report (in particular the *Design* section and the *Euston Station* site specific section) that proposals must be subject to detailed impact modelling in line with the LVMF and Historic England Guidance. However, we would go further and request that any emerging proposals that may affect views of the Cathedral, and / or its heritage significance, include detailed assessment as part of pre-application consultation that is explicitly agreed with the Cathedral and specialist heritage stakeholders beforehand.

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While the draft report states that any development at One Euston Square would be subject to consultation with the GLA, we suggest that direct mention of the Cathedral is made both with specific regard to this site and throughout the emerging plan regarding consultation on future tall building development. Even outside of the parameters identified within the LVMF there remains the potential for adverse impact to LVMF views of St Paul's. Early, meaningful consultation with the Cathedral, in our experience, leads to constructive development outcomes.

As mentioned above, we would welcome direct discussion and engagement in the plan review. We would welcome future notification and direct consultation over the next stages of plan preparation.

Working with Other Boroughs

The emerging review also includes a number of references to local views from other boroughs – we welcome this holistic approach and hope that that potential impacts to the Cathedral are noted thoroughly.

Conclusion

We welcome the chance to consult on this guidance, which will clearly play an important role in the development of a crucial opportunity area for Camden, and indeed wider London.

London is seeing, and will continue to see, an enormous amount of change through new development. As within the area covered by the Euston Area Plan, this development often has the potential to affect the Cathedral through the harmful alteration of key views that recognise its landmark status. This, of course, has the potential to affect its significance as a heritage asset of exceptional heritage value and would be a significant detriment to the aims of the LVMF and the values which are held to be important for London and Londoners.

We wish to work constructively with boroughs and developers to foster new development that delivers the aims of the NPPF while safeguarding our exceptional built heritage. As such, we would strongly recommend further information and assessment on the potential new building heights in order for this plan to progress.

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We hope that our comments above assist The London Borough of Camden in their update of this important plan.

Yours sincerely,

[redacted]

Oliver Caroe
Surveyor to the Fabric
On behalf of St Paul's Cathedral Chapter.

cc Ben Eley: Assistant Director (Design).
Tom Foxell: Historic England.
GLA

Director:
Oliver Caroe RIBA AABC
Mark Hammond RIBA SCA AABC

Associates and Designers:
Touseer Ahmad
Andrew Senior

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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 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	Mr	
First Name	Ivan	
Last Name	Stosic	
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
- 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	tick

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	✓

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 proposed demolition and redevelopment have proceeded without meaningful engagement with the local community or regard for the historic character of the neighbourhood
Once a site is allocated in planning documents, subsequent applications are rarely refused, a process that undermines genuine public input.
The buildings in question hold significant heritage and architectural value:
The Euston Square Hotel is a listed heritage asset that contributes to the area's cultural identity and should be preserved.
250 Euston Road is a well-designed 1970s building of high architectural quality, worthy of retention and adaptive reuse rather than demolition.

Demolition would generate substantial pollution and disruption for a community already burdened by ongoing infrastructure projects. It would also produce unnecessary greenhouse gas emissions and cause ecological damage — contrary to London's climate goals.

The current NHS use of 250 Euston Road is strategically vital to University College Hospital (UCH). Disrupting this function would compromise healthcare delivery and should be protected under planning policy.

The proposed tall buildings are visually and physically incompatible with the low-scale character of the area. Tolmers Square — a rare and valued public open space — would suffer reduced sunlight and an overbearing presence, diminishing its usability and amenity for residents.
There has been a serious lack of consultation:
The redevelopment of the Euston Square Hotel was not included in the Summer 2024 public consultation and was added without community input.
The 2024 consultation for 250 Euston Road made no mention of a 75m tower, a major change introduced without transparency.
The redevelopment prioritises high-value office space and private housing over the needs of existing residents and public services — a misalignment with London's commitment to inclusive, community-led development.
This proposal fails to respect heritage, community, environment, and public health.
It should be rejected in favour of a more sustainable, consultative, and community-sensitive approach.

(Continue on a separate sheet if necessary)

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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.

This proposal must be rejected outright. The proposed tower is an unacceptable imposition on the character and scale of Tolmers Square and North Gower Street — it must not procee d. Demolition is not justified; the existing buildings must be retained and sensitively refitted, not razed. Their current height must be preserved to safeguard the cultural and physical integrity of the area. Any development that disregards the heritage, amenity, and huma n scale of this neighbourhood is a failure of planning responsibility and must not be permitted.

(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	tick	**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.*

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.

For further information regarding how we store and process your data, please view the Council's Privacy Notice.

11. Signature:	Ivan Stosic (digital signature)	**Date:**	02.02.2026

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.

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Outlook

Re: Euston Area Plan objection

From Ivan Stosic [redacted]
Date Mon 02/03/2026 17:53
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

1 attachment (280 KB)
EAP-Update-Consultation-Response-Form OBJECTION to 250 Euston Road demolition (2).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 see below and please use this attached pdf as the previous pdf was dated wrong. Thank you.

Regards,
Ivan

[redacted]

On Monday, 2 March 2026 at 17:38, Ivan Stosic [redacted] wrote:

> Dear Sir/Madam,
>
> Please find attached the formal objection to the proposed demolition and redevelopment of 250 Euston Road, London.
>
> This objection outlines significant concerns regarding the scheme, including its impact on heritage assets, the local community, and the character of Tolmers Square and the surrounding neighbourhood. I would be grateful if this submission will be given full consideration in the planning process.
>
> Should you require any clarification or further information, please do not hesitate to contact me.
>
> Regards,
> Ivan
>
> [redacted]

[redacted]

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Outlook

Euston AAP Consultation response

From Chris Colloff <[redacted]
Date Mon 02/03/2026 09:49
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>
Cc Nicky Mchugh <[redacted] Devcon Team <devcon.team@thameswater.co.uk>

1 attachment (25 KB)
Camden Euston AAP_Feb26.xlsx;

[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 refer to the above consultation. Thames Water do not have specific comments on the draft updated AAP but support the content of Policy EAP4 in relation water and sewerage infrastructure.

Thames Water have undertaken a high level review of the sites within the AAP and attached a RAG assessment of the sites for information. It should be noted that the situation can change over time and dependent on the detail of developments coming forward. Where there are capacity constraints it may be necessary to apply phasing conditions to limit occupation of development until any necessary upgrades have been delivered to ensure compliance with Policy EAP4 of the AAP and Policy A1 of the emerging Local Plan Review.

Kind regards,

Chris Colloff
Planner
[redacted]
Working schedule: Monday to Thursday

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[redacted]

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[redacted]

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Site ID	Site Name
80444	Ampthill Estate Railway Edge (EA13) (LP)
26949	Capital City College (EA11) (LP)
80441	Cutting at Mornington Terrace (EA8) (LP)
54960	Cutting at Park Village East (EA6) (LP)
77406	Euston Circus Building (EA4) (LP)
80434	Euston Square Hotel (EA5) (LP)
7081	Euston Station and tracks (EA1) (LP)
62470	Former Maria Fidelis School (EA9) (LP)
80440	Granby Terrace Bridge / Hampstead Road (EA7) (LP)
80443	Regents Park Estate North (EA10) (LP)
77403	Royal Mail Site (EA2) (LP)
77409	Surma Centre (EA12) (LP)
77404	The Place and Premier Inn (EA3) (LP)

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Waste Network RAG Assessment	STW Catchment	STW RAG Assessment	Water Network RAG
	Beckton		
	Beckton		
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