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R56 Outlook

Draft Euston Area Plan

From Katherine Drew [redacted]
Date Mon 16/03/2026 14:56
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

1 attachment (430 KB)
The Royal Parks Planning Guidance Dec 2025.pdf;

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Dear Euston Area Plan Team

London Borough of Camden – Euston Area Plan Regulation 19 consultation

Please find attached a copy of The Royal Parks Planning Guidance document, which sets out the key planning considerations related to development outside the Royal Parks and the wider estate and how these should be addressed through development plans and development management.
It represents 'standing advice', to which TRP will refer in responding to consultations on development plans and planning applications.
The guidance seeks to ensure that TRP's charitable objects are purposes are understood, not compromised and where possible enhanced to ensure that proposals avoid detrimental impacts on the parks, their boundaries and settings.

We would welcome the opportunity to discuss this matter further with you – please do not hesitate to contact me directly via my contact details below.

Kind regards,

Katherine Drew
[redacted]
www.royalparks.org.uk
[redacted]

[redacted]

[redacted]

R56

THE ROYAL PARKS

The Royal Parks are:
Bushy Park | The Green Park | Greenwich Park | Hyde Park | Kensington Gardens
The Regent's Park & Primrose Hill | Richmond Park | St James's Park | Brompton Cemetery

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THE ROYAL PARKS

R56

LUC

Guidance on Development Plans and Planning Applications affecting the Royal Parks

Prepared by LUC and the Royal Parks Estates Team
December 2025

R56

Contents

Chapter 1: Background and purpose of this guidance 3
The Royal Parks 3
The Royal Parks' charitable purposes 4
Purpose of this Planning Guidance 5
Who is the Guidance for? 5
Structure of the Guidance 5
Chapter 2: The value of the Royal Parks 6
Extent and reputation 6
Which Royal Parks are designated for heritage or ecological value? 6
Metropolitan Open Land 8
Challenges 8
Chapter 3: Potential planning considerations 9
Guidance on the potential planning considerations 9
Chapter 4: Engaging with The Royal Parks on development plans and planning applications 17
Opportunities 17
Development plans 17
Planning applications 18
Monitoring and evaluation 18

Chapter 1:
Background and purpose of this guidance

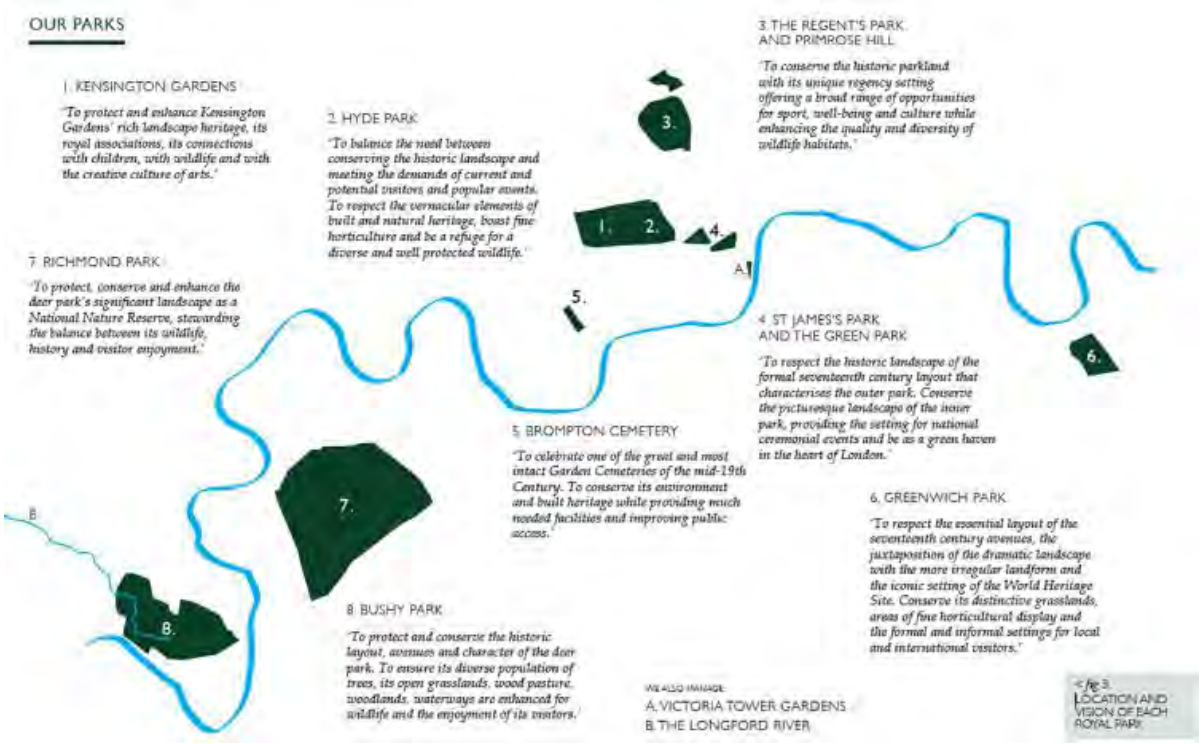
The Royal Parks

The Royal Parks Charity ('TRP') manages the Royal Parks on behalf of the Government. As shown in Table 1.1 and Figure 1, there are currently eight Royal Parks formally described by this name. Covering almost 2,000 hectares, they represent a significant portion of London's total public green space.

Table 1.1: Royal Parks in London

Park	Hectares
Bushy Park	450 hectares
The Green Park	19 hectares
Greenwich Park	75 hectares
Hyde Park	140 hectares
Kensington Gardens	98 hectares
The Regent's Park and Primrose Hill	191 hectares
Richmond Park	955 hectares
St. James's Park	23 hectares

Figure 1.1: The Royal Parks



TRP also manages certain other open spaces in London. These include Brompton Cemetery, Canning Green and Victoria Tower Gardens.

In addition, TRP manages the Longford River (and its freebords) in west London. Constructed in 1638-39. the Longford River is a man-made 19km distributary of the River Colne that diverts water to Bushy Park and a further 11km of distributaries to Hampton Court Palace and the Thames.

For ease of reference, the term 'Royal Parks' is used in this Guidance to describe all the land managed by TRP.

The Royal Parks' charitable purposes

The Royal Parks are owned by the Crown, with statutory responsibility for their care resting with the Secretary of State for Culture, Media and Sport. TRP, the charity, was created in 2017 to manage the Royal Parks on behalf of the government. The Freehold of Victoria Tower Gardens, Brompton Cemetery, Canning Green and Poet's Corner is owned by the Secretary of State for Culture, Media and Sport; these green spaces are not Crown land. TRP's charitable objects set out the main purpose of the charity and what it aims to achieve. They are:

- To protect, conserve, maintain and care for the Royal Parks, including their natural and designed landscapes and built environment, to a high standard consistent with their historical, horticultural, environmental and architectural importance
- To promote the use and enjoyment of the Royal Parks for public recreation, health and wellbeing, including through the provision of sporting and cultural activities and events which effectively advance the objects
- To maintain and develop the biodiversity of the Royal Parks, including the protection of their wildlife and natural environment, together with promoting sustainability in the management and use of the Royal Parks
- To support the advancement of education by promoting public understanding of the history, culture, heritage and natural environment of the Royal Parks and (by way of comparison) elsewhere
- To promote national heritage including by hosting and facilitating ceremonies of state or of national importance within and in the vicinity of the Royal Parks

TRP's Corporate Strategy (2022-2027) translates this into a core purpose: The Royal Parks is the charity which manages, protects and improves the parks in an exemplary and sustainable manner, so that everyone, now and in the future, can enjoy their natural and historic environments.

TRP, on behalf of the Crown as landowner, also has a responsibility to conserve and enhance the natural and cultural heritage of the Royal Parks. The estate includes important international conservation designations, sites of special scientific interest, listed landscapes, rare habitats, historic buildings, unique features and vistas.

Purpose of this Planning Guidance

This Planning Guidance seeks to influence development plans and planning applications that may affect the Royal Parks. It seeks to ensure that TRP's charitable objects and purposes are understood, not compromised, and where possible enhanced, and that proposals avoid detrimental impacts on the parks, their boundaries and settings.

Where appropriate, engagement with the planning system can also provide an opportunity to generate income for TRP, through the Community Infrastructure Levy and Planning Agreements which seek to mitigate or compensate for adverse impacts of development on the estate.

The Guidance sets out the key planning considerations related to development outside the Royal Parks and the wider estate and how these should be addressed through development plans and development management.

It represents 'standing advice', to which TRP will refer in responding to consultations on development plans and planning applications, thereby reducing the time needed for day-to-day case work. However, the advice may be supplemented by specific responses as appropriate.

Who is the Guidance for?

The Guidance is intended to be used by:

- Developers and other planning applicants - to help them shape their proposals to take account of TRP's concerns
- Local planning authorities whose administrative areas include the Royal Parks and/or TRP's wider estate - to help them understand and respond to TRP's concerns
- TRP's staff when responding to consultation on development plans and planning applications
- 'Friends of' the Parks groups - to enable greater consistency between groups and with TRP itself

The Planning Guidance updates any existing planning guidance contained in the Management Plans for the individual Royal Parks.

Structure of the Guidance

The Guidance is structured as follows:

- Chapter 2 describes the value of the Royal Parks
- Chapter 3 identifies the main challenges facing the Royal Parks and the opportunities that planning and development around the Parks present
- Chapter 4 sets out TRP's approach to engaging with development plans and planning applications, and future opportunities

Chapter 2:
The value of the Royal Parks

This chapter describes the value and importance of the Royal Parks with reference to their:

- Extent and reputation
- Designations for heritage and ecological value

It also sets out how these values are reflected in planning designations and informs the planning considerations set out in Chapter 3.

Extent and reputation

Covering 1.4% of Greater London's overall area, the Royal Parks represent a significant portion of London's total public green space. The Royal Parks' importance and influence extend well beyond their size; they are an important component of the nation's heritage, used by visitors, workers and residents, with tens of millions of visitors per year.

Which Royal Parks are designated for heritage or ecological value?

TRP's estate is made up of the eight parks, all of which are Grade I listed Registered Parks and Gardens except for The Green Park which is Grade II* and Primrose Hill which is Grade II. Poet's Corner is included within the boundary of the Palace of Westminster and Westminster Abbey including Saint Margaret's Church, which is part of the World Heritage Site.

The Royal Parks are also designated for a range of other values. These designations include Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR), a Conservation Area (CA), a Special Area of Conservation (SAC) and a World Heritage Site (WHS).

The designations applying to each of the Royal Parks are set out in Table 2.4.

Table 2.4: Royal Parks designations

Park & Local Authority (L/A)	Registered Park & Garden	Site of Special Scientific Interest	National Nature Reserve	Conservation Area	Special Area of Conservation	World Heritage Site
Hyde Park (Westminster)	✓ Grade 1			✓		
Richmond Park (Richmond upon Thames)	✓ Grade I	✓	✓	✓	✓	
Greenwich Park (Greenwich)	✓ Grade I			✓		✓
The Regent's Park and Primrose Hill (Westminster and Camden)	✓ Grade I (Primrose Hill Grade II)			✓		
Bushy Park (Richmond upon Thames)	✓ Grade I	✓		✓		
St James's Park (Westminster)	✓ Grade I			✓		
The Green Park (Westminster)	✓ Grade II*			✓		
Kensington Gardens (Westminster / Royal Borough of Kensington & Chelsea)	✓ Grade I			✓		

Metropolitan Open Land

In addition to these designations, all the Royal Parks are designated Metropolitan Open Land (MOL). MOL originated in public open space policy and was formally introduced in the Greater London Development Plan (1976) as a protective designation for strategically important open land in London.

The current London Plan affords MOL the same level of protection as the Metropolitan Green Belt, although functionally it is a more positive designation, focussing on landscape, recreation and nature conservation.

Policy 7.17 of the London Plan states that: The Mayor strongly supports the current extent of Metropolitan Open Land (MOL), its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL.

Challenges

As set out in Chapter 3, development and change of use of land outside the parks can affect the value, character and identity of the parks in many ways. This includes direct effects on views from the parks and the biodiversity value of the land, and indirect effects as a result of increased 'people pressure'.

Visitor numbers in the Royal Parks are increasing due to a range of factors. One of those factors is new developments close to Royal Parks, which can increase pressure on the parks, especially where alternative open space provision is limited. This, in turn, can increase the need for management and maintenance of the parks.

Chapter 3:
Potential planning considerations

This chapter forms the core of the Guidance. It sets out the potential planning considerations associated with development affecting TRP's estate.

They are 'potential considerations' because they don't necessarily all apply to all types of development and each case is different. However, they are most likely to apply to:

- Proposed tall buildings, and those that would be visible from the Royal Parks or affect the settings of important cultural heritage assets within the parks
- Developments that may adversely affect the amenity value of the parks and wider estate, for example in terms of noise impact
- Developments that are likely to increase the use of the estate, particularly in areas that are otherwise deficient in open space

The potential planning considerations are:

- Impact on the openness of the parks
- Overshadowing effects of tall buildings
- Impact on the open sky space around the parks
- Implications of the London View Management Framework
- Impacts on the cultural heritage value of the parks
- Impact on the tranquillity of the parks
- Impacts on the biodiversity value of the parks (including dark night skies)
- Impacts of increased footfall

Guidance on the potential planning considerations

Table 4.1 addresses each planning consideration and sets out:

- Potential impacts on the parks
- Relevant legislation and guidance, to which reference should be made by all interested parties
- The evidence that may be required to support development plans and planning applications

Table 4.1: Guidance on potential planning considerations

Planning considerations	Potential impacts on the Royal Parks	Relevant legislation and policy	Evidence that may be required to support planning applications
Impact on the openness of the Royal Parks	Visual and spatial openness are key features of the Royal Parks as designated Metropolitan Open Land (MOL). Their openness distinguishes the parks from the surrounding built up areas. Concerns about impacts on openness normally relate to developments within designated MOL. However, the visual openness of the parks can be affected by development at the edge of designated areas, particularly tall buildings.	London Plan Policy 7.7 on Location and design of tall and large buildings indicates that: The impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include the edge of the Green Belt or Metropolitan Open Land, London Plan Policy 7.17 on Metropolitan Open Land indicates that: *The Mayor strongly supports the current extent of Metropolitan Open Land (MOL), its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL.*	TRP will request an assessment of the impact of proposed tall buildings at the edge of the Royal Parks on the openness of the parks, as designated MOL. This can include the impact on visual openness and degree of activity around the building, which can affect the sense of openness.
Overshadowing effects of tall buildings	Overshadowing refers to the shadow cast by a building or a property on nearby properties,	An overshadowing assessment calculates the impact the proposed development will have on neighbouring private and public amenity spaces, such as gardens, parks and play areas. The Building Research Establishment (BRE) recommends that	TRP will request such an assessment where overshadowing from a tall building may

	including parks and open spaces.	50% of any qualifying amenity area should be able to receive at least 2 hours of direct sunlight on 21 March.	adversely affect people's enjoyment of the Parks.
Impact of development on the open sky space around the Royal Parks	The general principle is that new developments that change the skyline from viewpoints within the Royal Parks have the potential to adversely affect the amenity and setting of the parks. This applies particularly to tall buildings that rise above the surrounding tree line, where this exists.	There is no legislation or specific national or London Plan policy relating to the protection of open sky space around the parks. However, the Colvin and Moggridge report on 'Sky Space around London's Inner Parks' (2001) identified areas of high sensitivity to intrusion by distant tall buildings - typically these were areas where a rural character provided a contrast to the surrounding metropolis, or where a landscape and its views had been specifically designed - then mapped the sky space needed to safeguard these areas from building intrusion.	Where TRP considers that change to the skyline from viewpoints within the Royal Parks resulting from proposed tall buildings may have the potential to adversely affect the amenity and setting of the Parks, it will request an assessment using interactive 3D modelling and digital twin software tools, such as VU.CITY.
Implications of the London View Management Framework	Development around the Royal Parks could impact on designated strategic views. It is the Mayor's responsibility, together with the boroughs, to protect the strategic views (see next column). However, some of the strategic views are from Royal Parks, or extend across them. As custodian of the Royal Parks and as a consultee on more significant planning applications,	London Plan Policy 7.11 London View Management Framework includes a list of strategic views (Table 7.1) that the Mayor will keep under review. These views are seen from places that are publicly accessible and well used. The views represent at least one of the following categories: panoramas across substantial parts of London; views from an urban space of a building or group of buildings within a townscape setting; or broad prospects along the river Thames. The strategic views that include the Royal Parks, or which extend across them are: London Panoramas 1 Alexandra Palace to Central London 2 Parliament Hill to Central London	Where TRP considers that a proposed development may impact a strategic view, either from or across the Royal Parks, it will recommend that an assessment is undertaken of the significance of the impact.

R56

	TRP wishes to support the Mayor and the boroughs in protecting and managing the views, wherever possible.	3 Kenwood to Central London 4 Primrose Hill to Central London 5 Greenwich Park to Central London 6 Blackheath Point to Central London Linear Views 7 The Mall to Buckingham Palace 9 King Henry VIII's Mound, Richmond to St Paul's Cathedral River Prospects 17 Golden Jubilee/Hungerford Footbridges 18 Westminster Bridge 19 Lambeth Bridge 20 Victoria Embankment between Waterloo and Westminster Bridges 22 Albert Embankment between Westminster and Lambeth Bridges along Thames Path near St Thomas' Hospital Townscape Views 23 Bridge over the Serpentine, Hyde Park to Westminster 24 Island Gardens, Isle of Dogs to Royal Naval College 26 St James' Park to Horse Guards Road 27 Parliament Square to Palace of Westminster London Plan Policy 7.1 indicates that development will be assessed for its impact on the designated view if it falls within the foreground, middle ground or background of that view.	

		The Mayor has prepared supplementary guidance (SPG) on the management of views designated in the London Plan. The SPG identifies viewing places within which viewing locations can be identified. It also specifies individual assessment points from which management guidance and assessment should be derived.	
Impacts on the cultural heritage value of the Royal Parks	Development around the Royal Parks can affect their historic assets, including listed buildings, conservation areas, and their settings (the surroundings that contribute to their significance). It is Historic England's responsibility, together with the boroughs, to protect these historic assets (see next column). However, as custodian of the Royal Parks and a consultee on more significant planning applications, TRP wishes to support Historic England and the boroughs in protecting the parks' historic assets.	All the Royal Parks are recorded in Historic England's Register of Historic Parks and Gardens. In addition, Brompton Cemetery is a Grade I entry on the Register of Historic Parks and Gardens. Victoria Tower Gardens is Grade II Listed. Scheduled Monuments are located within Bushy Park, Greenwich Park and Kensington Gardens. At Bushy Park, the Old Brew House is a Scheduled Monument. Kensington Gardens contains the Scheduled Monument of Kensington Palace. Greenwich Park contains three Scheduled Monuments; the Anglo-Saxon cemetery, Greenwich Observatory and the Romano-Celtic Temple. Greenwich Park is within the Greenwich Maritime World Heritage Site. Poets' Corner is within the Palace of Westminster, Westminster Abbey and St. Margaret's Church World Heritage Site, and Victoria Tower Gardens is adjacent to it. Under the Ancient Monuments and Archaeological Areas Act 1979 Conservation of historic buildings and monuments (updated July 2022), TRP is obligated to put in place measures to protect and conserve its buildings, monuments, sites and landscapes of historic interest and to regulate operations or activities affecting them.	Where TRP considers that a proposed development may adversely affect the Royal Parks' historic assets, it will recommend that an assessment is undertaken of the significance of the impact, with reference to: Conservation Area Statements Conservation Management Plans for individual parks Assessment of significance will be prepared to supplement information in Listing, Conservation Area Statement etc. The Royal Parks Archaeological

			Management Strategy (2018)
Impact on tranquillity	Impact of noisy development, both during and post construction, on people's enjoyment of the parks. This applies particularly to Brompton Cemetery, which is sensitive to noise impacts.	Noise abatement legislation in the UK includes the Noise Abatement Act 1960, the Environmental Protection Act 1990, and the Control of Pollution Act 1974: Noise Abatement Act 1960: this act defines noise or vibration that is a nuisance as a statutory nuisance. It also includes restrictions on loudspeakers, such as prohibiting their use between 9 PM and 8 AM. Environmental Protection Act 1990: Section 80 of this act allows councils to serve abatement notices to stop or reduce noise. These notices can require the responsible party to take specific actions, such as stopping the noise or limiting it to certain times. Breaches of an abatement notice can result in a fine. Control of Pollution Act 1974: Part III of this act covers noise.	Where TRP considers that noise from a proposed development may adversely affect people's enjoyment of the Parks, it will request that an assessment is undertaken of the significance of the impact.
Protecting and enhancing the biodiversity value of the Parks (including dark night skies)	Development around the Royal Parks can decrease their biodiversity value by fragmenting habitats, increasing disturbance and increasing noise and light pollution. The Royal Parks provide important dark spaces at night, from and around which darker skies can be observed. Dark spaces	The Natural Environment and Rural Communities (NERC) Act 2006 Part 3, S.40: "Public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity." Biodiversity Net Gain (BNG) law became mandatory under the Environment Act 2021 and was introduced in England on February 12, 2024 London Plan Policy G6 – Biodiversity and Access to Nature: Sites of Important Nature for Conservation (SINCs) should be protected. London Boroughs should identify SINCs and eco corridors and support their protection and conservation whilst seeking opportunities to create other habitats. New	TRP will seek to ensure that potential adverse impacts on the biodiversity value of the parks are considered and addressed through good design and management. In most cases this will involve provision of appropriate green infrastructure and/ or urban greening measures.

	are also important for bats which depend on natural darkness for their survival. Unless carefully designed, artificial lighting in/on buildings and on streets and pavements around the parks can reduce the darkness of the parks at night, and therefore affect bat habitats.	developments should manage the impacts on biodiversity and to secure biodiversity net gain. The Greater London Authority (GLA) is preparing a Local Nature Recovery Strategy (LNRS) for London (a requirement of the Environment Act 2021); the aims of this are to identify areas where nature recovery should be prioritised. London Plan Policy G7 - Trees and Woodland: London Boroughs should retain, protect and enhance London's urban forest and woodlands. Any need to remove existing trees must be replaced, and green infrastructure strategies should help identify where trees can be placed to contribute to the Mayor's goal of increasing the tree canopy cover by 10% by 2050. The Institution of Lighting Professionals (ILP) has produced a Guidance Note (2023) which raises awareness of the impacts of artificial lighting on bats but also the potential solutions to avoid and reduce this harm.	TRP will pay particular attention to the introduction of artificial lighting, which could affect the darkness of the parks at night and have consequential effects on bats. Where appropriate, TRP will require an assessment of the impacts, taking account of the ILP Guidance Note (2023)
Increased footfall within the Parks	New development or change of use of buildings within the vicinity of the parks can increase footfall, especially where alternative open space provision is limited. This in turn increases management and maintenance requirements of park infrastructure and open	London Plan para. 8.4.1 notes that: Open spaces – particularly those planned, designed and managed as green infrastructure – provide a wide range of social, health and environmental benefits, and are a vital component of London's infrastructure. All types of open space, regardless of their function, are valuable in their ability to connect Londoners to open spaces at the neighbourhood level. Connectivity across the network of open spaces is particularly important as this provides opportunities for walking and cycling. Green spaces are especially important for improving wildlife corridors. London Plan Policy G4 Open Space states that	Where development around the parks is likely to increase footfall within the parks, TRP will require an open space assessment to be undertaken. This should identify any existing deficiency in open space provision, having regard to any open space studies published by the Local Planning Authority.

R56

	spaces, the cost of which falls to TRP.	A. Development Plans should: 1) undertake a needs assessment of all open space to inform policy. Assessments should identify areas of public open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for the different types required. Assessments should take into account the quality, quantity and accessibility of open space 2) include appropriate designations and policies for the protection of open space to meet needs and address deficiencies 3) promote the creation of new areas of publicly accessible open space, particularly green space, ensuring that future open space needs are planned for, especially in areas with the potential for substantial change 4) ensure that open space, particularly green space, included as part of development remains publicly accessible. B. Development proposals should: 1) not result in the loss of protected open space 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency.	Where the development would result in a significant increase in visitor numbers to the Parks, TRP will wish to engage in early discussions around S106 planning contributions for the management and maintenance of the parks.

Chapter 4:
Engaging with The Royal Parks on development plans and planning applications

As noted in Chapter 1, this Guidance is intended to be used by:

- Developers and other planning applicants – to help them shape their proposals to take account of TRP's concerns
- Local planning authorities whose administrative areas include the parks and/or TRP's wider estate – to help them understand and respond to TRP's concerns
- TRP's staff when responding to consultation on development plans and planning applications
- 'Friends of' the Parks groups – to enable greater consistency between groups and with TRP itself

The planning considerations set out in Chapter 3, together with the relevant policies and evidence, provide guidance and a resource for all parties when considering development and land use change around the parks.

The following paragraphs set out TRP's specific requirements with regard to development plans and planning applications.

Opportunities

Greater engagement with planning and development around the Parks will help to address the challenges identified within this guidance.

The Management Plans[1] for the individual parks set out a wide range of policies and projects that seek to enhance the parks.

As well as posing a threat, development around the parks creates a significant opportunity to generate an income for TRP.

Section 106 (S106) of the Town and Country Planning Act 1990 provides a legislative basis for planning obligations aimed at ensuring that new development results in appropriate social and environmental provision. S106 agreements, therefore, require developers to contribute towards the infrastructure and services that the new development, or local community, will need. This can include the provision of and improvements to parks and green spaces.

Chapter 3 of this Guidance describes how the planning system provides opportunities to capture some of the development value in the vicinity of the parks.

Development plans

The boroughs' Local Plans and Supplementary Planning Documents should play a key role in protecting and enhancing the Royal Parks. Specifically, they should include:

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[1] https://www.royalparks.org.uk/park-management/management-plans

- Policies for protection and enhancement of open spaces, including the Royal Parks
- Policies for onsite provision of new public open space in new developments, proportionate to the size of the proposal and the number of intended occupiers/users
- Policies for new public open space or improvements to existing public open space, where onsite provision is not feasible or sufficient
- Reference to the role of developer contributions, where appropriate, for new public open space or improvements to existing public open space (including the Royal Parks), using Section 106 agreements

The boroughs should also consider the use of funds generated from the Community Infrastructure Levy (CIL) for improvements to existing parks and green spaces, or for the creation of new ones. TRP is intending to take a more proactive role in seeking to secure funding from CIL as the parks are important green infrastructure in many boroughs.

Planning applications

Applicants for development in the vicinity of the Royal Parks should consider this Guidance and provide evidence in support of their planning applications that addresses the relevant planning considerations. TRP is open to pre-application discussions, which may be subject to fees.

Similarly, the boroughs should take account of the guidance when determining planning applications. They should ensure that TRP is consulted on planning applications that affect the planning considerations set out in Chapter 3 of this Guidance.

Monitoring and evaluation

This Planning Guidance will be reviewed as required to ensure that it reflects changes to national and London planning policy and in light of experience of specific cases.

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	Patrick	
Last Name	Allen	
Job Title (where relevant)	Sponsor and Co-Editor	
Organisation (where relevant)	Tolmers Village Forum	
Address Line 1*	[redacted]	
Address Line 2		
Post Town*		
Post Code*		
Telephone No.		
E-mail Address		

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

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:	Tolmer Village 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		Policy		Policies Map	Euston Area Plan

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

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

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

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

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

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

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

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

Please see statement & submissions attached

(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.

Please see statement + submissions attached

(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:

Given the seriousness of the proposals, the history of the site and the failure to consult, it is essential that we are able to make oral representations 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.*

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.

[redacted]

11. Signature:	Tolmers Village Forum	**Date:**	27/2/26

R57

Euston Area Plan Consultation

Response by the Tolmers Village Forum

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

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

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

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

The Tolmers Village Forum website www.Tolmers.net tells the story of this time and contains over 3,000 photographs, accounts from some of those who were there at the time, and a great deal of other information including press cuttings, reports, books, film and website links. In particular, the website documents the struggle with property developer Joe Levy and his company Stock Conversion & Investment Trust Ltd who wished to demolish Tolmers Square and build an office block similar to the Euston Tower on the other side of the Hampstead Road.

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

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

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

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

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

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

The entire area was now blighted by decay and planning delays. Many houses were empty and boarded up with corrugated iron. With a shortage of housing for young people and next to no rental market, it was inevitable that the empty houses would be squatted.

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

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

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

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

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

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

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

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

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

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

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

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

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

R57

Wrong urban design strategy

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

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

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

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

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

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

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

Consultation flawed

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

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

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

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

The planners could not confirm when this new plan officially became 'public knowledge' but it is now part of the plan out for a Regulation 19 consultation. This process was due to end on 22nd February 2026, but the consultation has now been extended by one week to 3rd March 2026.

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

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

This consultation began in 2023 but the significant detail that EA5 would be permit redevelopment to 75m was not included until late 2025. This was not drawn to the attention of consultees, nor was the addition of the redevelopment of Euston Square Hotel (a new EA4, replacing the previous Euston Tower). The consultation is therefore flawed and should be restarted to give all residents and business affected the opportunity to comment.

The three new site allocations (EA3, EA4 and EA5) were not included in the 2023 consultation on updates to the 2015 Plan. In the July 2024 consultation, see https://www.eustonareaplan.info/wp-content/uploads/2024/07/EAP-Consultation-Booklet-July-24-1.pdf:

Site Allocation EA3
July 2024: Did not include the Premier Inn building. Did not include the 40m height guidance.

Site Allocation EA4

July 2024: Did not include the Euston Square Hotel as a site allocation (Site Allocation 4 was previously shown as Euston Tower).

Site Allocation EA5
July 2024: Did not include a 75m high residential tower or the 40m height guidance.

Premature demolition

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

Demolition of 250 Euston Road would result in the loss of at least part of Tolmers Square; a crucial, quiet, open space where residents can sit and children play. Securing this green space was a major achievement of local inhabitants and Camden planners in the past. It is ironic that this is the second time locals have had to fight to preserve Tolmers Square in 50 years.

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

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

Buildings too high

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

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

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

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

Disruption for residents and businesses

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

- Demolition of terraces in Euston Street and Melton Street with houses and small hotels;
- Demolition of a Victorian office on Starcross Street used for a while by the BR shop Collectors Corner;
- Destruction of the beautiful and historic St James Gardens (https://alondoninheritance.com/london-parks-and-gardens/st-james-gardens-a-casualty-of-hs2/);
- Demolition in 2025 of a small park and playground constructed on the Hampstead Road only one year earlier;
- Loss of the Ibis Hotel and The Bree Louise pub;
- Loss of Cardington Street/Melton Street which was a very convenient and quiet North South route for cyclists who now have to navigate a longer route via the pollution and traffic of the Euston Road;
- North Gower Street and Drummond Street being relentlessly and continuously dug up and blocked off for the re-routing of utilities.

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

Plan will lead to more years of blight and disruption for residents and businesses which is unacceptable.

Harming the NHS

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

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

Community History of Tolmers Square

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

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

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

ENDS

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

**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.*

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	✓

R58

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) THE BUILDINGS HAVE BEEN SELECTED FOR DEMOLITION AND REDEVELOPMENT WITHOUT CONSIDERATION OF THE LOCAL COMMUNITY WHICH IS LONG-STANDING AND A HISTORIC NEIGHBOURHOOD ONCE LISTED IN A 'SITE ALLOCATION' A PLANNING APPLICATION IS NOT REFUSED.

(2) EUSTON SQUARE HOTEL IS A HERITAGE BUILDING AND SHOULD NOT BE DEMOLISHED. 250 EUSTON ROAD SHOULD BE RETAINED. IT HAS NOT COME TO THE END OF ITS USEFUL LIFE AND IS VALUED BY THE NHS AS OFFICES, A TRAINING CENTRE AND A VEHICLE PARKING AREA FOR THE HOSPITAL OPPOSITE.

(3) A REDEVELOPMENT WITH TALL BUILDINGS WILL BE OUT OF SCALE WITH THE LOW SCALE OF THE SURROUNDING LOCAL HOUSING AND BUSINESS NEIGHBOURHOOD. TOLMERS SQUARE OPEN SPACE IS A PLEASANT AND WELCOME REFUGE FROM EUSTON ROAD AND HAMPSTEAD ROAD TRAFFIC AND SHOULD NOT LOSE MORE SUNLIGHT CAUSED BY TALL BUILDINGS.

(4) PEOPLE HAVE NOT BEEN CONSULTED. THE EUSTON SQUARE HOTEL DEVELOPMENT WAS NOT INCLUDED IN THE CONSULTATION OF SUMMER 2024 AND THE 75M TOWER AT 250 EUSTON ROAD WAS NOT MENTIONED IN THE SUMMER 2024 CONSULTATION.

(5) THE SCALE OF THE PROPOSED BUILDINGS WILL BE OVERBEARING AND WILL CHANGE THE CHARACTER OF THE HISTORIC TOLMERS SQUARE, HOUSING AND ENVIRONMENT.

(6) OFFICE SPACE AND PRIVATE MARKET HOMES ARE BEING PRIORITISED AT THE EXPENSE OF THE NEEDS OF THE COMMUNITY WHICH NEEDS MORE SOCIAL HOUSING AND SPACE FOR LOCAL BUSINESSES TO DEVELOP.

(7) I NOTE THAT IN SECTION 7.31 OF THE OPEN SPACE STUDY, THE STORY GARDEN HAS BEEN CAPTURED BY THE STUDY BUT IS CONSIDERED A TEMPORARY USE OF THE SITE, LEADING TO THE CONCLUSION THAT IT IS NO LONGER OPEN SPACE

(8) TOLMERS SQUARE IS CONSIDERED HIGHE QUALITY/HIGHER VALUE OPEN SPACE IN THE OPEN SPACE STUDY AND SHOULD BE PROTECTED.

(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.

THE 75M TOWER SHOULD NOT BE BUILT.
IF NECESSARY, THE CURRENT BUILDING AT 250 EUSTON ROAD SHOULD BE REFITTED AND NOT DEMOLISHED.
THE HEIGHT OF THE EXISTING BUILDINGS SHOULD BE PRESERVED
THE CULTURAL INTEGRITY OF TOLMERS SQUARE SHOULD BE PROTECTED.
TOLMERS SQUARE SHOULD BE PROTECTED AND ENHANCED. IT SHOULD NOT LOSE MORE SUNLIGHT.
THE TOLMERS SQUARE OPEN SPACE SHOULD NOT BE REDUCED IN SIZE. WE HAVE LOST TOO MUCH OPEN SPACE IN THE AREA.

(Continue on a separate sheet if necessary)

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

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

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

☐ **No** ☑ **Yes**

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

IT IS VERY IMPORTANT FOR LOCAL VOICES TO BE HEARD AND RECORDED

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

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

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

Privacy Notice
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11. Signature:	[redacted]	**Date:**	1 March 2026

Outlook

EAP Update Comments

From jeff travers [redacted]
Date Tue 03/03/2026 23:57
To EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

3 attachments (5 MB)

2026 EAP Update Drummond St Station Fig 4.2 Comments.pdf; 2026 EAP Update P34 Transport Context Comments.pdf; 2026 EAP Update Future Platfoms Fig 4.2 Comments.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
Attached are 3 Comments Forms
Regards
Jeff Travers

[redacted]

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

Part B – Please use a separate page for each representation

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

Name or Organisation:

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

Please use the links below to view the documents:

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

Paragraph	fig 4.2	Policy	fig 4.2	Policies Map	fig 4.2

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

1) Legally compliant	Yes		No	
2) Sound	Yes		No	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)	unsound
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	

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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.

Section 4.1 (Euston Station and Tracks) Fig 4.2 of the Euston Area PLan (EAP) Update shows a dotted line running parallel to Coburg Street within the HS2 station (slightly to the west of the word "HS2".
Camden's EAP team have confirmed to me that this dotted line signifies the division of the HS2 station platforms and concourse into
1 the station that will be built within the EAP period ending in 2051 (to the east of the dotted line)... and
2 the station that may be needed in the future after the end of the EAP period ie after 2051.

The depiction of this area of future station within the EAP Update as "HS2 station" with the same symbology as the HS2 station to be built before 2051 is incorrect and confusing.

This 400 metre long area west of the dotted line needs to have a separate and distinct symbology.
It could be *possible future station".... or "temporary open space" ... or "prefab temporary knowledge quarter/ workshops" or meanwhile use

Even if the future station area were to be designated as being required for construction within the EAP Update timescale (eg just before 2051) the EAP Update needs to clearly identify this large and important area of land for uses prior to the commencement of construction.

The alternative is that this 400 metre long area of hypothetical future platforms to the west of the dotted line be identified as an area of 'planning blight'

(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.

Re Section 4.1 (Euston Station and Tracks)... In fig 4.2 the meaning of the important dotted line within the HS2 Station site must be explained.
This is best done by using a different symbology (identified in the legend) to distinguish the area of HS2 station that is actually proposed (since the Government reduced the size of HS2's station to 6 platforms) and the area of the HS2 station site designated for possible future platforms *should they ever be needed)

This opens the question ... what use to put the 'future platform site' to in the meantime... which could be the whole EAP Update period (ie until 2051) or it could be most of the period.

This question should best be addressed via a separate subsection in section 4.1... or in the Viability and Funding subsection

It should be noted that DfT told Euston Community Representatives Group meeting in 2024 that Adjoining Station Development on this site (of the 4 scrapped HS2 platforms) would privately fund the six platform HS2 station.
DfT confirmed that Overstation Development had been found to be unviable.
So building OSD without platforms underneath (for future platform retrofitting) is even more unviable.
But the Euston Partnership July Board meeting minutes records that this is what is being considered.
So this needs explaining in the EAP Update to balance the aspirational spin about "knowledge quarter" etc

(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 **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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and its important that this issue isn't fudged
I'd be happy to help the inspector

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11. Signature:	[redacted]	**Date:**	3.3.2026

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1. Introduction

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Euston Area Plan Update – Proposed Submission Draft 2026
Representation Form

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

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

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

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

Part A – Submit only one copy of this

1. Personal Details*		**2.** Agent's Details (if applicable)

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

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

Part B – Please use a separate page for each representation

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

Name or Organisation:

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

Please use the links below to view the documents:

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

Paragraph	fig 4.2	Policy	fig 4.2	Policies Map	fig 4.2

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

1) Legally compliant	Yes		No	
2) Sound	Yes		No	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)	unsound
2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate	
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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.

Since the adoption and publication of the original Euston Area Plan (EAP) all the buildings to the west of the existing NR station that HS2's Supplementary Environment Statement (SES) (produced for the HS2 Bill) schedules for demolition... have been demolished... except for one.
That undemolished building is the historic Drummond Street Underground Station
building. This building currently houses a small vent shaft and substation for the underground railway.
The underground station building is currently scheduled to be demolished after replacement vent shaft and substation in Euston Street have been commissioned.

HS2's SES para 5.3.11 states the tube station building's demolition was needed in order to construct the "the revised scheme" for the HS2 station (as per the SES).
That "revised scheme" has been scrapped and furthermore the EAP and HS2 assert there is currently no HS2 station "revised scheme"... therefore no justification for the need for demolition.

HS2 and DFT have confirmed to several Euston Community Representatives Group that such a HS2 station "revised scheme" has yet to be established so there is considerable doubt over whether a different future station "revised scheme" will require the demolition of the underground station.
For example if it is decided that some of the platforms in the future HS2 station plan only need to be 200 metres long then there will not be a need to demolish the historic underground station building.

This changed status of the underground station ie that its need for demolition is no longer justified by HS2's SES schedule has not however been noted in the EAP Update. And the EAP Update does not contain any details of the historic underground station (eg as a historic asset to the local context).

(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.

The EAP Update needs to record that the historic Drummond Street Station still exists and there cannot be a need to demolish the historic building at present because there is currently no HS2 station design. This is because HS2's previous scheduling of it for demolition was explicitly because demolition was needed for construction or HS2 Station to the "revised scheme" set out in the HS2 Bill.

So the location of the Drummond Street Underground Station needs to be shown on an EAP Update plan drawing and a study of its architecture needs to be included in the EAP Update

I understand from Richard Simpson that LBCamden have such an assessment of the underground station.

This will provide information within the EAP Update regarding the building's restoration, conversion and integration into future Adjoining Station Development streetscape should the future HS2 station "revised scheme" (when known) zone the underground station site as Adjoining Station Development use rather than HS2 station use.

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I was project architect for Liverpool Street Phase 2 and re HS2 was witness to the petition to the HoL Select Committee of the landlord of the Bree Louise pub (close to the Drummond Street Tube station) providing technical evidence to demonstrate that demolition of the pub was not needed for the "revised scheme" of the Bill.
It was subsequently revealed by HS2 to Euston Community Representatives group that the then "revised scheme" did not require the demolition of the pub for the station construction... (as required for CPO) but rather its demolition was needed to permit construction of an office building.

So the 'need for demolition' may require a technical interpretation of the future "revised scheme" for the HS2 station... re which I may be able to help the inspector

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11. Signature:	[redacted]	**Date:**	3/3/2026

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R59

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Part B – Your representation(s). **Please use a separate page** for each representation you wish to make.

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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	Jeffrey	
Last Name	Travers	
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

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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.

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Paragraph	page 34	Policy		Policies Map	

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

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The final bullet point in the "Transport and Public Realm" sub-section of Section 2 (Context) says the following
"Existing transport pressures, general growth in the use of Euston Station and additional passenger numbers associated with HS2 and development will create a need for significant infrastructure enhancements to enable the safe and efficient onward movement of additional passengers".

This is more or less the same as the text in the original 2015 EAP... only the words "and development" and "the safe and efficient" have been added for the update.

This is now completely out of date however.

The EAP team have told me that the original text has been retained because TfL have not updated their 2014 transport report.

There will obviously be far less passengers using Euston when HS2 starts running because HS2 will divert the majority of current Euston passengers via Old Oak Common.
In 2014 te plan was to divert long-distance passengers to/from Leeds and Nottingham via Euston (called phase 2b)... but this was scrapped.... to leave Euston to serve its current passenger catchment area... but with HS2 providing the "second busiest station in the UK" at Old Oak Common.

The EAP team have told me that the original text has been retained in order to justify funding the expansion of the Euston tube concourse (in the proposed integrated station) on the basis that it is needed due to increased passenger numbers.

I'm frankly appalled at this suggestion... and wonder what other facts have been distorted or exaggerated to manipulate viability ... eg of commercial sites that

(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.

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Its important that the above statement is changed to say that there will be far fewer passengers at Euston after HS2 starts and this will enable the station to be upgraded with minimum impact on passengers

Please refer to section 6 for the reason
And absolutely DO NOT use out of date TfL modelling to update EAP

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because I specialise in rail related development equation stuff...
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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.

R60

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

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

R60

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	EA4/EA5	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	✓

R60

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

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

[redacted]

AT [redacted] I HAVE LIVED HERE FOR 25 YEARS. I AM A [redacted], AND [redacted]

I WAS SHOCKED TO HEAR ABOUT THE PROPOSALS FOR 250 EUSTON RD. THERE HAS BEEN NO NOTIFICATION BY POST OR ANY CONSULTATION WITH THE RESIDENTS OF THIS SHELTERED HOUSING BLOCK.

THE PROPOSED DEMOLITION AND RE-BUILD WILL TAKE YEARS AND BE AWFUL FOR THE RESIDENTS OF 40 HAMPSTEAD RD AND FAMILIES LIVING IN TOLMERS SQUARE. WHICH WILL BE A BUILDING SITE. WE WILL SUFFER WITH POOR AIR QUALITY AND POLLUTION FOR THE DURATION.

250 EUSTON RD IS PART OF UCH HOSPITAL. I THINK ITS A BAD IDEA TO KNOCK IT DOWN AS IT PROVIDES VITAL NHS SERVICES

TOLMERS SQUARE IS QUIET AND PEACEFUL, WITH BEAUTIFUL TREES, AND IT SHOULD STAY THAT WAY.

250 EUSTON RD + EUSTON SQ HOTEL ARE PERFECTLY GOOD, FUNCTIONING BUILDINGS, AND SHOULD BE RE-FITTED RATHER THAN DEMOLISHED. I DON'T THINK THIS PLAN HAS BEEN PROPERLY PREPARED AND IT SHOULD NOT PROCEED WITHOUT PROPER CONSULTATION.

(Continue on

R60

7. Please set out what modification(s) you consider necessary to make the Euston A Plan Proposed Submission Draft legally compliant or sound. Please have regard t 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.

RE-FIT RATHER THAN DEMOLISH

PROTECT NHS SERVICES

KEEP EXISTING BUILDING HEIGHTS

TO PROTECT THE GARDENS + TREES

IN TOLMERS SQUARE

(Continue on a separate sheet if necessary)

R60

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

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

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

☑ **No** ☐ **Yes**

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

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

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

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

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

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

11. Signature:	[redacted]	**Date:**	2/3/2026

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:**

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

Part B – Please use a separate page for each representation

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

Name or Organisation:

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

Please use the links below to view the documents:

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

Paragraph	4.2	Policy	EA4/EA5	Policies Map	EA4/EA5

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

1) Legally compliant	Yes		No	X
2) Sound	Yes		No	X

3) Complies with the Duty to co- Yes [ ] No [X]

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

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

1) Positively prepared (it is not prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements) [X]

2) Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate [X]

3) Effective (the plan is not deliverable over its period and based on effective joint working on cross-boundary strategic priorities) [X]

4) Consistent with national policy [X]

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 cooperate. 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.

There is an abundance of reasons as to why the Euston Area Plan (EAP) is not legally compliant, unsound or fails to comply with the duty to co-operate.

It has been decided that the buildings will be demolished and then redeveloped. This decision has not taken into consideration the local community or the rich history of this neighbourhood. Once an area has been listed in a 'site allocation' a subsequent planning application is not refused.

The buildings selected for demolition should not be demolished. Euston Square Hotel is a heritage building which should be retained at all costs. 250 Euston Road is a high-quality building from the 1970s which should also be retained at all costs.

Demolition and rebuilding will cause unacceptable pollution and disruption to the community which has already been through many years of suffering due to the continuing work from HS2. Additionally, the greenhouse gas emissions this project would create will cause unnecessary ecological harm.

The use of 250 Euston Road should be protected for use by the NHS. It is of strategic importance to the UCL Hospital and should not be disrupted.

Redevelopment with tall buildings is out of keeping with the low scale of the existing neighbourhood. The vital public open space at Tolmer's Square should not have a reduction in the already limited sunlight. Any reduction to sunlight is unacceptable and harmful to the community and the environment.

The scale of the proposed buildings will have an overbearing effect on Tolmer's Square and peoples' homes and spoil it.

The local community has not been consulted about the proposals. The redevelopment of Euston Square Hotel was not included in the last public consultation (Summer 2024) and has been added in without consultation. The 250 Euston Road site allocation consulted on in Summer 2024 did not mention a 75-meter-high tower. This is unacceptable.

The needs of the existing community are being put to the side, while high value office space and private market homes are being prioritised.

Our houses have been and are continuing to be damaged due to the constant piling from HS2 works. My house shakes constantly throughout the day and the cracks throughout my house are unacceptable and there are constant loud noises throughout the day which sometimes make it hard to think. The rest of the community are facing similar problems and to subject us to more of this is simply unfair.

Our homes are being damaged by the nonstop HS2 piling; my house shakes throughout the day, cracks are spreading through the walls, and the noise is so constant and severe that it is hard to think straight. The whole community is dealing with this same disruption and for us to be forced to endure even more of this is completely unacceptable.

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.

There are no benefits to the community for a tower to be built; a refit would be more appropriate than a demolition.
The existing height of buildings should not be exceeded
The cultural integrity of Tolmer's Square and North Gower Street must be protected.

These modifications will make the EAP legally compliant and sound as it takes into consideration the impact these works will have on the people who live there as well as the wildlife which, I believe, it currently does not.

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**	X

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 ensure the voices of the local community are heard. This is the place we live so it is only right that we have a say in what happens here.

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

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

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

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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:	**Nasreen Ullah** [redacted]	**Date:**	**02/03/2026**

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.

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