

From: Fran Heron [REDACTED]
Sent: 03 March 2026 22:35
To: EustonAreaPlan
Subject: Euston Area Plan Representation Submission - Fran Heron
Attachments: EAP Response - Fran Heron.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.

To whom it may concern,

I would like to submit a formal representation form which has been endorsed by the Ampthill Square Tenants and Residents Association at this month's committee meeting 2 March, 2026. Attached you will find the full submission. If you have any questions at all, please do let me know and I look forward to hearing back from you in due time.

Fran Heron

PERSONAL DETAILS

Title: Ms

First Name: Frances

Last name: Heron

Job Title: [REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

Organisation:

This is my own personal submission after 30 years of activism with the Ampthill Square .
TRA and Camden Town DMC

Ampthill Square Tenants and Residents Association voted unanimously on 2nd March to
endorse the contents

4. Do you believe the Euston Area Plan Update proposed submission draft is -

4.1 Legally compliant – NO

4.2 Sound - NO

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

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

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

As per text off submission, I believe that, given all the changes since last revision the EAP should be
rewritten entirely

6 See Feedback on following pages

7 EAP needs a full rewrite, no modifications would make it sound at this point

9 I WOULD LIKE TO TAKE PART IN THE ORAL PART OF THE EXAMINATION HEARING

In a paper form, you have to provide quite succinct answers which don't fully detail the entire
argument or allow for clarifying key arguments when questions arise.

WORK IN PROGRESS TO FIND EAP PROPOSALS UNSOUND

After thirty years of working hard with our TRA, DMC and Camden Council to impact various schemes and plans, sadly I have given up believing communities are able to change planning proposals even to elicit minor improvements reducing detrimental impacts.

I believe the Euston Area Plan Proposals are **UNSOUND** for multiple reasons. Mainly these would fall into the categories of lack of and/or insufficient protection of

1. Environment
2. Climate change
3. Community health, safety and well-being
4. Accessible Green Open Space
5. Lack of affordable sports and games facilities

There have been so many changes to the EAP that it is arguable that it needs a complete rewrite.

Site Allocation gives arbitrary power to LBC and landowners. The proposed site allocation including 205 Euston Road and the heritage building Euston Square Hotel, should not be lost.

Once site allocations have been made it is virtually impossible to challenge.

Tolmer Square

These Site Allocation proposals proved the final straw for me personally. My views are shared by many local people including those who attended the meeting organised by Alice Brown in the Old Diorama building on Wednesday, 11th February and chaired by Dennic McNulty, chair of the local TRA.

During this meeting lack of meaningful consultation and environmental considerations were highlighted. Recent investment in Tolmers Square housing to improve sight-lines and environmental improvements as well as to upgrade heating internally and boxing in external pipework cost £411,000 was completed in 2021 for 33 flats and possibly four shop fronted premises.

Cllr Danny Beales, then Cabinet Member for New Homes, Jobs and Community Investment and now MP for Uxbridge and South Ruislip, and Cllr Adam Harrison, Cabinet Member for A Sustainable Camden (currently) both waxed lyrical about the works completed in 2021. On Tolmers Square, the following was said (see full news release here: <https://news.camden.gov.uk/improvements-to-tolmers-square-completed/>)



"I am delighted that the improvements at Tolmer's Square have now been completed.

"Access to quality open spaces is vital for our communities, particularly for those living near to the HS2 works, and in the wider context of the ongoing pandemic.

A number of green space assurances were previously secured from HS2 to help mitigate against the loss of open space and the impact of the construction works.

"Whilst these don't make up for the loss of open space in the area because of HS2, it's

important we make the most of the spaces we do have. This project has helped create a greener and more welcoming space for the community to enjoy for years to come.

Councillor Danny Beales, Cabinet Member for Cabinet Member for Investing in Communities, Culture and an Inclusive Economy



"More than two hectares of public green space have been lost during the HS2 construction – the size of seventy-six tennis courts.

"With the experience of the global pandemic over the past year and a half, we more than ever recognise the importance of having access to good quality green spaces.

"These are important to local communities because they improve health and wellbeing, and the character of an area, as well as creating habitats for wildlife and benefitting the environment."

Councillor Adam Harrison, Cabinet member for a Sustainable Camden

Godwin & Crowndale

A furore erupted when plans were passed to demolish a recently DMC-funded MUGA as was some parking that generated money for the Tenant Management Organisation. Having built on one playground people were rightly concerned that this rotten decision would set a precedent and be replicated elsewhere in the borough.

Despite vigorous opposition, the block was built to house large families from a single ethnic minority. The block was built with walled gardens back and front reducing play area for the children already living in the estate.

It provided 10 x 4-bedroom homes with only one fully accessible.

Juniper Crescent Estate

Juniper Crescent is a well-designed project with housing built around a community area providing a human-size strong community atmosphere which was built in 1997, just under 30 years ago. However, plans are now in process to demolish the estate and replace it with increased density and high building levels which it is said could breach Camden's own agreed density and height levels. Juniper Crescent may well be outside the boundary of the EAP but I have included it as an example of how LB Camden will break its own agreed density and height restrictions.

The LB Camden Planning Committee gives permission for development which even breaches its own guidelines on height and density.

Over the years, after highlighting significant negative impacts flowing directly from planning applications and sometimes persuading the planning committee to impose minor variations to plans because they recognise the beneficial impacts, when it comes to delivery of the plans, a posse of building consultants/agents/construction firms get these variations annulled citing that the extra financial burden imposed would effect the viability of the scheme.

Personally, I no longer feel LB Camden considers its responsibilities for the health and well-being of its communities. Profit and Greed are now the only driving factors and the Only Show in Tone. Residents can no longer influence planning decisions, if indeed they ever could.

ASTRA committee certainly feel the same way as did attendees at the event organised by Alice Brown recently that was held in the old Diorama Centre and chaired by Dennis McNulty, chair of a local TRA.

Lack of Green Public Open Space.

LBC is in breach of regulations on the quantum of Green Open Space LB Camden is required to provide. Their Open Spaces Report was written over a decade ago at which time it was not in compliance and since then Green Public Open spaces have shrunk further – particularly in Somers Town & St Pancras ward and Regents Park ward. The catchment area of Camden Town DMC is almost contiguous with Regents Park and St Pancras and Somers Town wards. The EAP needs to be rewritten with the ACTUAL Green Open Spaces taken into consideration and not reports whose data is significantly out of date and non compliant due to extensive green open space losses over the last decade.

Health Needs Assessment

There needs to be the consideration of the needs of local communities whose health and longevity is known to be up to ten years less than more affluent areas of Camden. It is my view that any proposed plans should include a Health Analysis and Risk Assessment of the contents. I am unsure what, if any, measures the EAP is enforcing in the respect. Residents here don't have the luxury of leaving the area for holidays or extended periods of time; especially during intense periods of construction which means they are often locked in to an area of construction and all the negative effects throughout the entire duration of the construction. The impacts of this need to be considered.

Emissions, air quality and noise pollution

It is recognised that demolition increases CO2 into the atmosphere from previously captured carbon in the built environment.

The noise impacts have been felt egregious in the Regents Park Estate New Build which has a steel piledrives frame and floor attachments. The banging of steel on steel and steel on other material is causing a massive amount of consistent noise for the surrounding area. Residents have suffered years of horrendous noise during building periods. Local communities in Regents Park Estate have suffered from noise and air pollution from digging up roads and new buildings built around a steel frame which is pile-driven into the ground and fixed to floor levels. Roads are continuously dug up and re-filled throughout construction due to pipes being laid, removed, replaced, or moved and as designs and needs are constantly changing. This creates a huge amount of waste and repeat pollution and noise throughout the process which has an incredibly negative effect on residents who live near it.

In St Pancras & Somers Town Ward, decades of noisy construction have impacted residents' quality of life from huge schemes such as the building of the British Library, The Crick Institute, neighbouring Kings Cross development, Edith Neville school, CIP blocks and other regeneration projects such as Godwin & Crowndale. Released carbon capture from demolitions is horrendous.

Public Transport

No matter how much it is denied, construction has a massive impact on public transport, whether it be from reduced traffic lanes on Hampstead Road and idling vehicles pumping out exhaust fumes while would-be passengers await the relevant bus to their destination of choice.

In Somers Town it has caused traffic to cut through residential streets to avoid standing stationary on Euston Road. The impacts on Public Transport on Euston Road from already agreed HS2 building works is significant. How public transport will operate at all if the demolition of 205 Euston Road and the Euston Square Hotel at Tolmers Square go ahead would clearly be immense with over 15 distinct bus routes using the Euston Road.

Promises made during planning to alleviate worst impacts of construction (WORD) for local communities almost always rescinded as 'not viable' by construction companies. Hugely controversial planning applications are nodded through by compliant Planning Committee

Detrimental Impacts of HS2 Preliminary Works

HS2 legal assurances to local people provided by the government can be broken vis-à-vis the promise that there would always be one lane of traffic open on Hampstead Road that has now been countermanded and HS2 is planning at least four periods of a month each during the coming year when Hampstead Road will be completely closed.

Health & Safety

Safety measures to repair uneven pavements and potholes ignored throughout years of construction HS2 and local construction works. Does the London Borough of Camden count the serious accidents caused? If not, this needs to be done and rectified.

Impacts of rent convergence.

As with most initiatives birthed by the DWP, finding out information is a nightmare. However, what is certain is that any new lettings will be calculated at the current target rent rate itself dictated by a complicated formula where changing statistics and datasets apply. Our concern is that this complicated system will make it impossible for most eligible for social housing to obtain such housing. The new rental price will be based on 30% of the Broad Rental Market Areas (BRMA) which is likely to make social housing unaffordable to many social housing residents. The impact of this needs to be seriously considered and responded to appropriately to ensure social housing residents are not priced out of Euston.

Multiple Planning Regimes

The complicated nightmare is not all the fault of LBC. A series of overlapping plans - The Camden Plan, The Local Plan, the London Plan and even the Euston Area Plan – all impact development good, bad or indifferent.

Questions

It would be interesting to find out, apart from Section 106 monies (where is there a list of these?), what does LBC gain from allowing/approving large and/or small scale building projects/estates/small sites/etc

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.

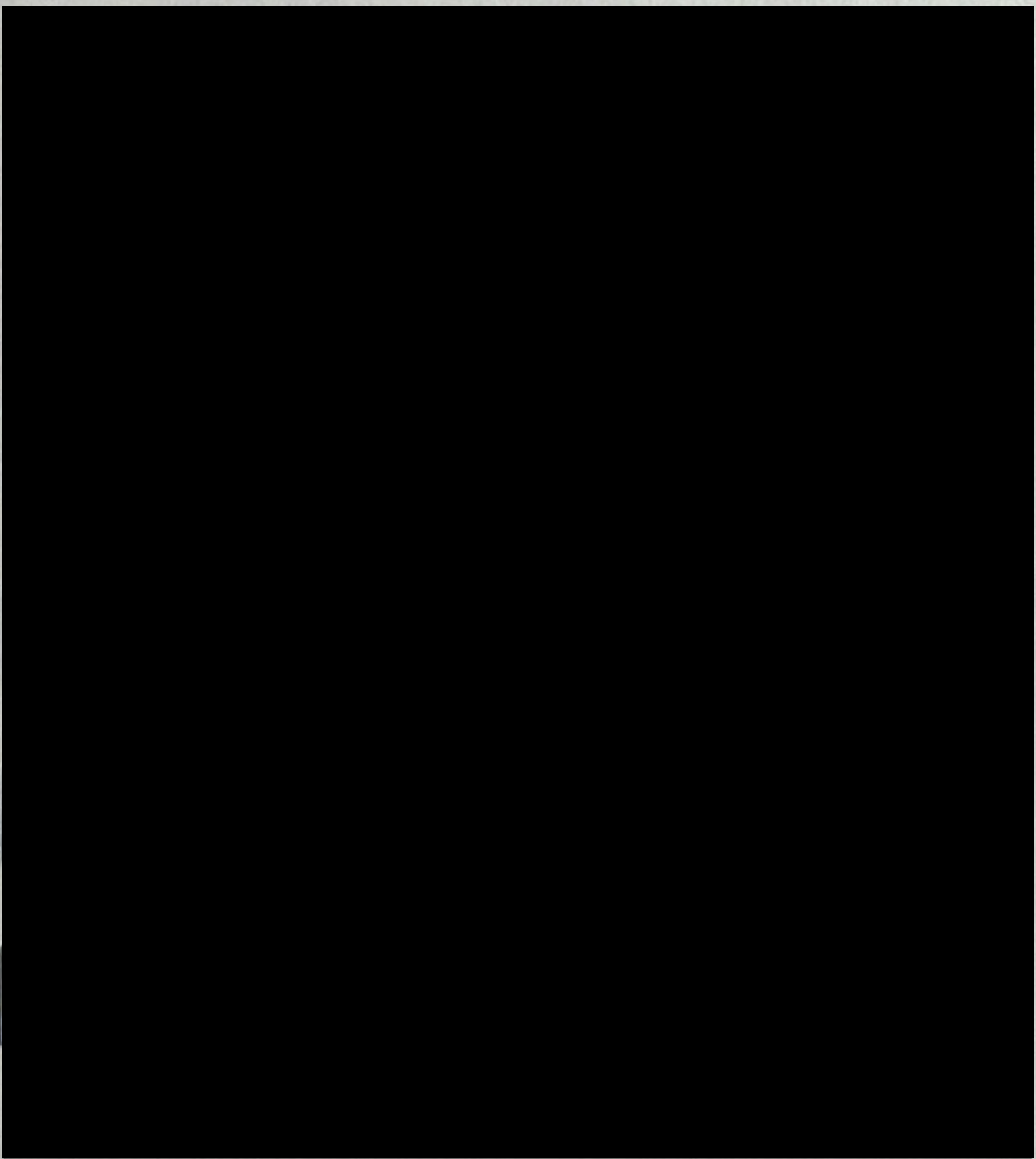
Before completing this representation form please refer to the attached guidance notes.

Part A – Submit only one copy of this

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	Master	
First Name	Alex	
Last Name	Ateo	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1*		
Address Line 2		
Post Town*		
Post Code*		
Telephone No.		
E-mail Address		

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

Part B – Please use a separate page for each representation

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

Name or Organisation:

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

Please use the links below to view the documents:

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

Paragraph

4.2

Policy

EA4/EA5

Policies
Map

EA 4/EA5

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

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

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

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

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

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

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

I lived in this area since I was 7. I have a good memory of Tolmers Square. We have nice neighbourhood. The whole community will be damaged greatly, physically & mentally. We have never been noticed at all about the plan. It seems to us the plan didn't consider the local community or the historic neighbourhood. ∴

Secondly, ~~NOT~~ Euston Rd is a high quality building from 1970s which should be retained. so as the Euston Square Hotel. Thirdly, the HS2 project has impacted us a lot in our life physically & mentally, which is still ongoing, we never knew when it will end. Demolishing ~~NOT~~ Euston & the Euston Square Hotel will impact us severely on of the impact from HS2. Which we do not want to happen.

In addition, which is very important as well, the ~~intake~~ of Sunshine - Tolmers Square has been blocked of the sunshine from different direction already. The 75 metre high building will block completely the Sunshine to Tolmers Square, which I believe either the residents' health & the plants' health will be affected dramatically.

Hence, I strongly object the plan being carried out into being.

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

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

We would like to reserve the height of the current buildings which can be refitted instead of demolish.

Also the historical buildings & the cultural integrity of Tolmers Square and North Gower Street should be protected.

(Continue on a separate sheet if necessary)

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

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

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

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

☐

No

☒

Yes

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

We want our voice to be heard.

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

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

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

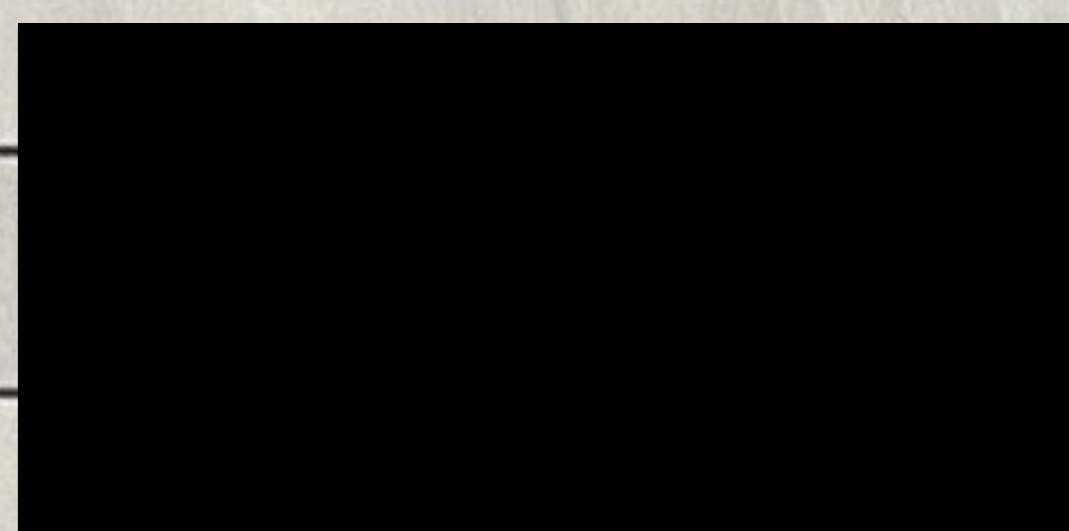
- (a) when the Euston Area Plan Update has been submitted
- (b) when the Inspector's Report is published
- (c) when the Euston Area Plan Update is adopted

Privacy Notice

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

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

11. Signature:



Date:

21/03/16

R06



Outlook

Fw: Representation Form

From

Draft saved Thu 05/03/2026 16:49

From: Anthony Towell - [REDACTED]

Sent: Sunday, February 15, 2026 14:12

To: EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

Subject: Representation Form

[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.

R06

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

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

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

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11. Signature:

[Redacted Signature]

Date:

15 | 02 | 26

R06

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

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☒

No

☐

Yes

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R06

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

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

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

The building could be refurbished
not pulled down creating more waste for
landfill. The tower block proposal would
block out light for residents of Tolmers
Square. Where would all the staff working
in 250 Euston Road go? How would
a new building create more jobs when
hundreds of people already work there?
How can the new hotel provide access
to Euston Square Underground Station -
that belongs to Transport for London.
How does this fit with Plans for HS2
Who owns the land that runs between
250 Euston Road - Car park North Gower Street
and into Tolmers Square. Both Camden Council
and Owners of 250 Euston Road Deny it.

(Continue on a separate sheet if necessary)

R06

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

6. Please give details of why you consider the Euston Area Plan Update Submission Draft is or is not legally compliant, unsound or fails to comply with the duty to 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 was no consultation with local residents. Apparently one notice was placed on a lamp post on Hampstead Road. The remainder relied on the access to social media and the Camden New Journal. Of the 60 people who attended the meeting not one had been aware of the proposal.

(Continue on a separate sheet if necessary)

R06

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.

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- Policies map (pdf)

Paragraph	4.2	Policy	EA4 / EA5	Policies Map	EA4 / EA5
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- | | | | | |
|----------------------------------|-----|--------------------------|----|-------------------------------------|
| 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

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- | | |
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R06

Euston Area Plan Update – Proposed Submission Draft 2026
Representation Form

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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	DR	
First Name	DAWN	
Last Name	BAKER TOWELL	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1*		
Address Line 2		
Post Town*		
Post Code*		
Telephone No.		
E-mail Address		