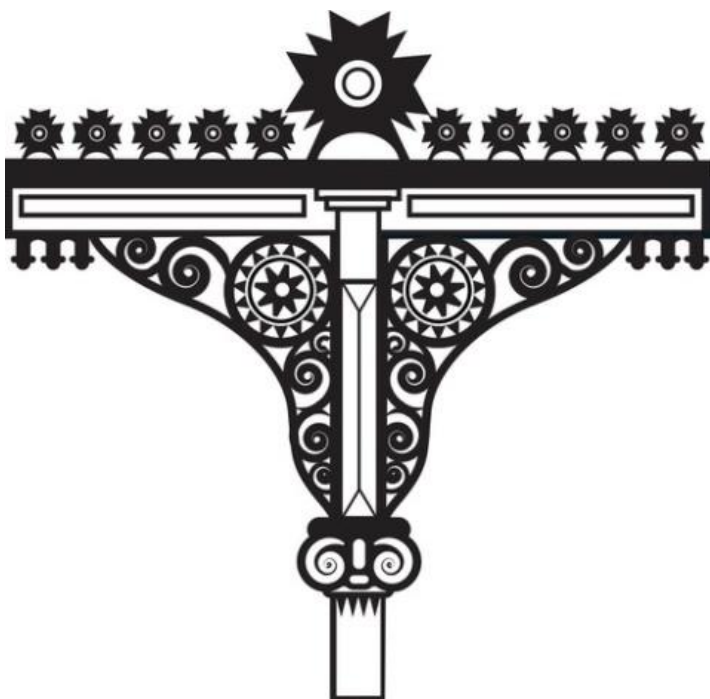


UK & IRELAND PLANNING CONSULTATION(S)

Stage: Universal Representation

Sections: Conservation Area Appraisal(s), Scoping Document(s), Local Plan, Supplementary Planning Document(s)



Consultee	David Barton
Role:	Community Campaigner- Civic Heritage
Section	Conservation Area Appraisal(s), Scoping Document(s), Local Plan, Supplementary Planning Document(s)
Interest	Design Codes, Designated & Non-Designated Heritage Assets, Conservation Areas, Climate Change, Historic Buildings, Traditional Vernacular Architecture

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Acronyms / Abbreviations

LA	Local Authority
SPD	Supplementary Planning Document
TVA	Traditional Vernacular Architecture
TA	Traditional Architecture

Introduction:-

Context:

This consultation feedback submission has been produced by Mr. David Richard Barton, also known as Community Campaigner David Barton who is promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA)/ Traditional Architecture (TA) as a key feature across UK and Ireland-wide Local Authorities and associated Planning Departments at all tiers of Local, Regional and Central Government.

This universal consultation therefore acts as an official Representation at all and any stage of official area UK Planning Consultations- Preliminary Scoping Documents, Named Stages of the Local Plan, Conservation Area Appraisals and Supplementary Planning Documents (SPDs), primarily regarding Design Codes.

Representations are being made by Mr. Barton as part of his ongoing work to champion the key stakeholders at various key areas old and new with a view to supporting their economic growth through the merits of High-Quality style Conservation with the hope of encouraging wider constructive and restorative support through positive and constructive working.

It is submitted that TVA should play a key part in any and all policy moving forwards on the grounds of conferring practical benefits be these periodic maintenance, their perceived support from the public, their invaluable contribution to achieving Climate Crisis Targets set local, nationally and internationally alongside their overall cost-effectiveness to key stakeholders alike in terms of Planning and sourcing of raw materials.

*One primary document that should be considered with significance especially alongside my own representation is a written academic account of the actual practicalities associated with Traditional Architecture from a leading expert in their field.^{i.)} Not only does this in-depth analysis provide an in-depth take on the widely assorted merits of this type of Architecture but it fully corroborates my case made across all sections typically found in one of the consultations highlighted above.

Furthermore, my representations to date and contained herein this document are duly supported by the Founder and Director of The Institute for Traditional Architecture^{ii.)} who has identified and recognised my own contribution(s) to communities up and down the Sefton Borough. This is an internationally acclaimed organisation which periodically works with other leading agencies and organisations to bring about effective positive change.

Outlined throughout Submission are responses to existing Consultations which set out why I consider amendments to existing Planning Policy documents are necessary to ensure the best possible outcomes.

References to supporting documents are contained in the indented blue numbering.

This Submission has been prepared for UK and Ireland-wide Local Authorities in the hope that it may serve as an umbrella representation by Mr. Barton. This does not prejudice his ability to also comment on live stages of any one Consultation, merely providing the ability to be put in touch directly with any one Local Authority in receipt of this Representation with the prospect of also taking part in any version(s) of Consultations begin ran by said Local Authorities. If there are future consultations, especially regarding Design Codes and SPDs relating to this across both designated and non-designated heritage assets then it is hoped that these are duly provided to Community Campaigner David Barton.

Mr. Barton has cited material references and sources from his previous Representation to the Bootle Area Action Plan Consultation (2021-2026) that align with his existing and ongoing points which he would like to raise in parallel with other Local Authorities. Where a more detailed discussion with leading sources, such as Architects and Academics may prove conducive with these Councils then Mr. Barton would be delighted to discuss this further.

Community Campaigner David Barton:

Community Campaigner David Barton is a Heritage Campaigner of over 11 years' experience who has championed and led a number of successful campaigns to promote TVA in modern-day life. His dual mandate is to provide effective (alternative) use of historical buildings encompassing a full restoration alongside achieving the mainstream construction of new classical architecture on numerous economic, environmental and ecological grounds that align with existing policy set out by Central Government covering the UK and increasingly elsewhere across the world.

Having worked with a wide array of residents, businesses and organisations in that time, which has included the full restoration of the Victorian Verandahs on Lord Street, Southport in tandem with the respective key stakeholders and other property owners to prevent demolition of Old Builds across Sefton, Mr. Barton is now hoping to make the process of utilising the built environment to its fullest potential a far simpler one that will enable Bootle to fully reach its maximum potential as a historic town.

Mr. Barton should like to credit and thank the leading professionals and organisations that continue to support his TVA endeavours including:

- 1) Mr. Francis Shaw- Shaw & Jagger Architects**
- 2) The King's Foundation**
- 3) Create Streets**
- 4) Francis Terry & Associates**
- 5) The Institute for Traditional Architecture**

This Submission is supported by the following appendices:

- i) Appendix i): Academic Perspective on Traditional Architecture by Mr. Francis Shaw of Shaw & Jagger Architects (PDF)
- ii) Appendix ii.) Written Endorsement from Mr. Joseph Jutras of The Institute of Traditional Architecture (PDF)
1. Appendix 1: Sefton Climate Emergency Strategy [Climate Emergency Strategy](#)
2. Appendix 2: Sefton 2023/2024 Climate Report
modgov.sefton.gov.uk/documents/s124335/Climate+Emergency+Annual+Report+2023-2024+final.pdf
3. Francis Terry & Associates- The Secrets of Popular Architecture
<https://www.ftanda.co.uk/thoughts/secret-of-popular-architecture/>
4. Appendix 3: PAS Guide to better Sustainability Appraisal [PAS Guide to better Sustainability Appraisal | Local Government Association](#)
5. Appendix 4: Sefton Council Annual Air Quality Report 2024 [air-quality-status-report-2024.pdf](#)
6. Francis Terry & Associates- Natural Architecture Discussion
<https://www.ftanda.co.uk/thoughts/natural-architecture/>
7. Francis Terry & Associates- Sustainable Architecture Discussion (VIDEO)
<https://www.ftanda.co.uk/thoughts/what-is-sustainable-architecture/>
8. Francis Terry & Associates- Can Beautiful Homes be built in a Factory?
<https://www.ftanda.co.uk/thoughts/beautiful-homes/>
9. Create Streets- Design Codes Explanation [design codes](#)
10. Create Streets- Bootle Christ Church Project [Bootle with Safe Regen](#)
11. The King's Foundation- Officer's Mess Design Guide Rutland (PDF)
12. Create Streets- Lichfield Design Guide- [Lichfield](#)
13. Create Streets- Chatham Design Guide- [Chatham](#)

14. Create Streets- Street Assessment Service
[Street Assessment - Create Streets](#)
15. Create Communities Mapping Platform
[Create Communities mapping platform - Create Streets](#)
16. The King's Foundation- BIMBY Toolkit
[Puts the power in your hands to influence new buildings in your area.](#)
17. Francis Terry & Associates- Poundbury Discussion
<https://www.ftanda.co.uk/thoughts/poundbury/>
18. Institute of Traditional Architecture- Urban Planning
[Urban Planning – Institute of Traditional Architecture](#)
19. [Heritage and the Economy | Historic England](#)
20. [The Economic Value of the Heritage Sector | Heritage Counts | Historic England;](#)
21. [Investing in Heritage to Avoid Embodied Carbon Emissions | Heritage Counts](#)
22. [Historic England;](#)
23. [The Embodied Carbon Emissions of Construction and Retrofit Materials for Traditional Buildings | Historic England](#)
24. InYourArea- Community Campaigner David Barton- Placemaking Principles 2021
['Placemaking' is key to the future for Southport claims campaigner](#)
25. InYourArea- Community Campaigner David Barton- Role of Traditional Town 2021
[The role of the traditional town 'key' to Southport's future](#)
26. Living with Beauty Report Example 76, Page. 177
[Living with beauty: report of the Building Better, Building Beautiful Commission](#)
27. InYourArea- Community Campaigner David Barton- Green Action Plan 2021
[Former Councillor proposes climate change plan](#)
28. InYourArea- Community Campaigner David Barton- Hedgerow Planting Benefits 2021
[Campaigner calls for more green spaces in Southport](#)
29. Benefits of Greenery Planting- The Guardian 2010
<https://www.theguardian.com/environment/green-living-blog/2010/oct/14/carbon-footprint-house>
30. Francis Terry & Associates- Glad to be Pastiche Discussion
<https://www.ftanda.co.uk/thoughts/glad-to-be-pastiche/>
31. Francis Terry & Associates- What is more important, Materials or Form?
<https://www.ftanda.co.uk/thoughts/rotonda-in-cheese/>
32. InYourArea- Community Campaigner David Barton- Lathom Hall Seaforth
<https://www.inyourarea.co.uk/news/restoration-of-seaforth-beatles-landmark-club-a-breakthrough-in-combatting-climate-crisis>

Design Codes, Designated & Non-Designated Heritage Assets, Conservation Areas, Climate Change, Historic Buildings, Traditional Vernacular Architecture:

SECTION 1: Design Codes:-

1. Design Codes based on TVA should be utilised in preference to Design Guides
2. LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc.
3. Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.
4. LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing.
5. Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited).
6. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.
7. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.
8. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location.
9. Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term.
10. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual and group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished

prized old buildings beloved by the community, such as community pubs, libraries and community centres.

11. Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones, such as observed with many civic buildings in Budapest Hungary and the Federal University Buildings in the US.
12. Where there have been evolving building styles over years, eg. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, ie. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders, especially where a streetscape may have been annihilated during the World Wars.

SECTION 2: Designated & Non-Designated Heritage Assets:

1. Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the City.
2. Enhancement of Setting with funding grants and financial incentives from all tiers of Government for Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds.
3. Archive Pooling of invaluable source material, such as Historic Photographs, Oil Paintings, such as “Memory Lane” featured on InYourArea Magazine to enrich existing material archives.
4. New officialising of Non-Designated Heritage Assets must be actively supported even if informed by the (wider) community thereby providing some possibility of removing these from risk of demolition.
5. Incentives must be provided to those dependable sincere third party investors that take on, maintain and protect said sites against their annihilation from the streetscape with rescue-packages actively promoted and supported once again with a trusted Directory creating goodwill amongst the local community.
6. Opportunity to meet or correspond on Zoom Conference Call regarding key areas, buildings and places at risk where key stakeholders, such as property owners may be better placed to engage in positive and constructive discussion through third parties, such as myself and a trusted panel of experts in their fields and sectors who could enable these people and organisations to maximise their civic heritage, whilst proactively striving to protect more historic buildings from decline and/ or demolition where a strategy package for raising the revenue to do this could be arranged and facilitated.
7. Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the

societal divides between misperceived “good areas” where affluent people reside in historical style properties and less advantaged reside in contemporary ones.

8. Industry should be conserved at former industrial complexes, such as Economic Docks with equivalent sites offering modern-day uses, alongside traditional uses such as export and import of raw materials at places such as Docks and Port encompassing: ICT sector, Green Research & Development, etc.
9. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of long-beloved buildings, especially those with demonstrable evidence of Holy Worship.
10. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area’s founding or history locally.
11. All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition.
12. Reconstruction Programme harnessing existing limited crafts people’s skillsets to be used as a fundraising vehicle to bring back buildings that may have been demolished to dissuade future demolition as a choice by property owners and by means of expanding these otherwise lost skillsets that are at live risk of becoming extinct from the UK.
13. Checklist of buildings at high risk must be expanded beyond the existing groups and organisations that are saturated with high caseloads, such as SAVE Britain’s Heritage, etc so that dialogue channels can be created and fostered between Community Champions for Civic Heritage.
14. Bespoke-tailored funding packages for Properties at Risk of decline or demolition should be integrated with Local, Regional and Central Government-funding as a means of regional economic output through the return on investment that may support other key grant funding capital infrastructure projects, such as transportation and drainage improvements.

SECTION 3: Conservation Areas:-

1. Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc.
2. Highways & Street Furniture should be duly supported across the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs- where any and all guidance and support must and should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate economic construction and restoration across other designated Conservation Areas, etc or otherwise.
3. Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make Old Builds practical to own, live and work in the 2020s onwards. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
4. Permissions for authentic replica and more durable materials, such as reproduction sash windows must be supported to prevent exorbitant high costs through procuring these, limited longevity and economic climates being unstable. This must be assessed on a case by case basis.
5. No more deliberate manipulation and selective misinterpretation of using contemporary modern designs using old-style fabric raw materials, such as stone cladding for new housing where the design and shape clearly undermine the concept of blending within or around a Conservation Area.
6. Compendium of approved and recognised TVA Architects based across the UK with a view to supporting the training in time of more Northern counterparts to reduce cost associated with travel expenses, etc. This will actively reduce the level of demolition applications countering the purpose of this SPD and other live Policy. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
7. New Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones.
8. Blue Plaques should be fully supported across as many different Conurbations, especially if Applicants reach out for endorsements.

9. Discretionary Rate Relief should be provided to those proactively support LAs with conserving their respective Conservation Areas through their own resources, skillsets and time as an incentive to others to work alongside the Council positively and constructively.
10. Where long-lost prized buildings are reconstructed whether based in a Conservation Area or not this should confer discretionary financial support, e.g. Rate Relief for the length of time taken to produce this outcome acknowledging the embodied carbon now contributing positively towards the LA's Climate Change Action Plan Targets.
11. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with collaborate fundraising models utilised from key stakeholders, such as property owners, undisclosed third party investors, Residents' Groups, etc.
12. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with authentic identical reproductions permitted where all options to secure finance have been fully exhausted and/or the existing streetscape is at imminent risk of receiving contemporary replacement street furniture on health and safety grounds, eg. Lap Posts.

SECTION 4: Climate Change:-

1. Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.
2. Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal divides regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area.
3. Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.
4. A brick by brick case study of as many buildings as possible may warrant invitation of national and international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK.
5. Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially

again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council.

6. Biodiversity- maximise greenery along all arterial roads and commuter routes with dense tree planting and the introduction of hedgerows and wherever possible financial incentives to get more private property owners on side.
7. Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.
8. Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.
9. Coastlines should be reclassified as SSSIs, especially where the economic potential is not being fully realised, such as Coastal Towns with underused Beaches, such as Southport in Sefton as one example for other LAs.
10. Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated specifically for housing where there may be a deficit.

SECTION 5: Historic Buildings:-

1. Create a Designated AND a Non-Designated Heritage Asset List, such as AHV whereby existing buildings and those that may yet return can be logged and recorded to combat the Climate Crisis whilst making heritage work for LAs in modern day with attractive locations timeless for everyone to appreciate enhancing the investor appeal, all-round interest and acknowledging the industrial pioneering legacy of the City.
2. Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to eradicate the perceived neglected aesthetic.
3. Exception Areas, such as those at risk or recently restored have the real potential for wider grant funding for ambitious projects out of the realm necessarily of undisclosed third party investors supporting Property Owners, therefore all and any support in reaching these person(s) will greatly contribute to all possible tangible success in the interim period.
4. Providing key guidance, such as agreed in-keeping historic street furniture, such as Cast Iron Lamp Posts, Bins, Planters approved upon inspection of historic photographs, agreed installation and where appropriate maintenance by the LA will ensure the iterative success of this transferring to other Conservation Areas, etc.
5. Scheme to rebuild and reconstruct long-lost buildings, prioritising vacant sites that could adapt some mixed use with residential accommodation and commercial application thereby supporting Climate Action, creating employment and recordable success through placing of necessary economic drivers, such as offices for Technology Sector if original use cannot be sourced in sufficient time simultaneously meeting housing targets.
6. Archive Blueprints for historic conurbations that have suffered architecturally over time through building conversions, demolitions, etc should be provided to key stakeholders, if necessary with a printing charge available for official spiral hard copy version to view detailed historic plans covering layouts, etc.
7. Those people and organisations that have either/ both maintained their properties well over the years or may wish to provide additional support to others, such as restorative support, archive blueprint guidance, etc should be eligible for discretionary reductions by the Council across various property taxes where they may be suffering hardship or through personal circumstances.
8. “Newer” style housing with true authentic rhythm, such as Suburban style faux Tudor fascia frontages with red clay tile pitched roofs and terracotta design windows (tile hung walls) are a good compromise whereupon finance and scheduling may otherwise adversely impact on housing settlements.
9. Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of place.

10. LAs should work closely with Foundries to procure raw materials and building services in the event of harnessing their own Contractor Firm(s) in-house that could work cross-authority to make net savings whilst ensuring particular new housing neighbourhoods conform to an appropriate style.
11. Modern “Carbuncle” extensions should not be permitted at any one area- instead an authentic style addition may be used to retain blending.
12. Discretionary financial support packages to assist House Builders choosing the traditional vernacular route should be considered and utilised where it can be proven that this third party will restore the historic streetscape yet making it applicable or modern day requirements- residential or commercial. This may be especially so where they are able to help others prevent the demolition of a prized Old Build built before the 1950s.

SECTION 6: Traditional Vernacular Architecture:-

1. Provide a directory of approved and trusted Conservation Specialist Contractors- this will be key for repairs and maintenance reducing costs for all parties, expediting the physical process of regeneration and smoothen planning work schedules so that finer detail may be considered on priority cases or those that may be at risk of consequential repair, such as Places of Worship and detached Buildings with flat roofs, etc at higher risk of damage than customary dwellings.
2. These same people should be readily contactable for new construction
3. Encourage smart building methods and use of TVA as meticulously explained in this SPD outlining “Breathing” Solid Wall Construction using older style materials thereby reducing maintenance cost which combined with the approved contractor directory will further drive down costs, time and effort for everyone.
4. Alterations- must introduce a simplified listed building consent form and application process that is streamlined encouraging better maintenance of Old Builds and reducing the rising propensity of builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015.
5. Provide specialist Heritage Arts & Craft Skills Programmes that anyone can learn and use so that these high cost tasks can eventually stabilise in price making them more affordable and available to those that don’t have the time to do this themselves or may be risk averse even.
6. Extensions- there must be a proactive emphasis on in-keeping structural fabric to prevent future errors, such as the Municipal Building depicted in the SPD being replicated again thereby harming the Conservation value.
7. New Housing Estates should adopt historical archival blueprints, ie. A Georgian, Victorian or Edwardian layout with the likeliest period architecture utilised where this area remained greenbelt until the 1950s.

8. Area Expansion of housing must revert to traditional timeless designs that confer many practical advantages over modern styles that are harder to maintain are timeless with regard to dating and ensure a more evenly distributed community atmosphere in the long-term future.
9. Infrastructure should be appropriately considered for existing and new areas so that no one area is at risk of becoming congested through traffic for a particular commodity, such as Schools, Doctor Practice, Dental Practice, etc.
10. Site Layouts should complement the historic layout with a view to Post 1950s contemporary Architecture out of place being one day demolished to reinstate Long-lost beloved buildings from before the World Wars that could blossom economically today.
11. Building Form shouldn't permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location.
12. Façade Design mustn't be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said contemporary architecture is pursued.

SECTION 7: Making an application:-

1. Identify recurring applicants that are harming civic heritage, be this across Conservation Areas, Non-designated heritage assets or elsewhere with experience of demolition to date- this should be considered before granting permission to apply or acquire planning approval.
2. Enforcement Penalties for key stakeholders that purposely allow their properties to fall into decline and hoped eventual demolition through this tactic, which is more prevalent since 2020.
3. Create an Action Plan to deter persons or organisations from pursuing demolition, such as financial incentives, sincere investor network directory set by Central Government to offload for profit and enforced Design Codes that cannot be manipulated through semantics like Design Guides in isolation as has happened elsewhere. This must be kept for emergency instances where there is an expected threat of decline or demolition.
4. Agreed that temporary alteration of heritage sites, such as stairs or ramps for wheelchairs should be utilised to prevent deleterious loss of historic surroundings and features alike.
5. Full Pre-Consultation publicised and utilised to ensure appropriate Design Codes for new housing alongside positioning and layout in case volunteer assemblies may assist property owners with restoration of historic buildings.
6. Brick by brick Analysis undertaken of projects set for Traditional reconstruction so that these statistics may provide both the Council with evidence for green grant funding support for other key infrastructure projects, such as Transportation and

Drainage Defences and property owners may incur a discretionary reduction in associated reconstruction costs of heritage buildings and vistas.

7. Ability to lock feedback in for Consultation automatically unless the council can alert interested consultees in taking part again whether they are locally, regionally or nationally based.
8. Special partnerships with Property Owners of historic buildings at risk of decline/ demolition to discreetly support them with the option to publicise this accordingly to reach out to others in the same position to secure alternative use for these structures as opposed to demolition.
9. Proactive effort to stop Breaking and Entering style of “Urban Explorers” who are coincidentally apparent whenever demolition is scheduled for buildings especially since 2020.
10. LAs to proactively work closely alongside Community Champions and other leading Heritage Groups, such as English Heritage giving these organisations a voice on the frontlines, especially where so many buildings are presently being overlooked for additional guidance and/ or support due to cost and time restraints facing these same groups and organisations (including the LA).

SECTION 8: MISCELLANEOUS:-

1. Provide all possible support for the reconstruction of Old Builds as is happening elsewhere across Europe, especially Budapest, Hungary, North America, etc to significantly increase Embodied Energy/ Carbon storage.
2. Establish a Plan to adopt Unadopted Roads or supply key services, such as carriageway resurfacing as disabled access and entry/ exit of Emergency Vehicles is presently a cause for concern.
3. Provide Pre-Approval and agreement of specialist Conservation Area style Historic Street Furniture, such as Cast Iron Lamp Posts, Bins and Planters for this prime Conservation Area including installation, maintenance costs (where appropriate).
4. Provide full access to the Archive Resources (at no/minimal cost) as an invaluable incentive for existing and parallel undisclosed third Party Investors. Discretionary waivers may be appropriate for those third parties proactively working to prevent decline and demolition of historic buildings.
5. Car Parking on and off street should be supported to ensure freedom of choice for everyone, accessibility and connectedness.
6. Car Parking abodes should be tastefully designed like modern-day stables for vehicles that are in-keeping with the built historic environment.
7. Provide publicly published names of consultees willing to work alongside the Local authority and other key stakeholders, such as property owners and undisclosed third party investors, etc.

8. Provide select tours for prospective investors and housebuilders of existing traditional architecture where Design Codes of this identical style would complement both old and new architecture bending the area better more cohesively, eg. the form and layout of Oxford City Centre which has changed minimally structurally since the 1800s.
9. Provide a focused effort on utilising people's skillsets on a meritocratic basis, ie. Procure specialists and volunteers that could work together on key emergency projects, such as Historic buildings at risk without layered bureaucracy on achieving positive outcomes, such as Community Assets where deadlines can be thwarted by separate third parties.
10. Create a Top Ten Historic Buildings at Risk Register where appropriate conditions, such as security against Urban Exploration, etc can be utilised safeguarding these structures, providing the respective property owners peace of mind whilst actual scope for revitalising these for solid economic gain.
11. Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.
12. Free Car Parking may be monitored through expected proof of purchase when visiting, eg. minimal £1.00 at a shop encouraging partnerships between private businesses and LAs.

**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	Mrs	
First Name	Bela	
Last Name	Begum	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1*		
Address Line 2	London	
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	EA4 / EA5
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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.

It is not possible to conclude that the Euston Area Plan Update concerning sites EA4 and EA5 is legally compliant, as concerns remain regarding the adequacy of consultation with the local community, and procedural compliance.

The proposals for sites EA4 and EA5 fail to adequately address the long term impact on the residents of Tolmers square / North Gower st, and the immediate local community.

I do not believe that these proposals were positively prepared, and have been added to make up for shortfalls elsewhere in the Plan.

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

(Continue on a separate sheet if necessary)

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

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

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

In order to make EA4 and EA5 legally compliant and sound, they should be removed from this Euston Area Plan Update, as they are an addition, and did not form any part of the original 2015 plan (see attached). They have been added to make up for shortfalls elsewhere in the EAP. Existing buildings on these sites should be re-fitted rather than demolished.

(Continue on a separate sheet if necessary)

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

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

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

☐

No

☐

Yes

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

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

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:	Faruque Ahmed	Date:	15/02/2026
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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

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



Outlook

Churchway Estate

From cheesescientist · [REDACTED]**Date** Sun 15/02/2026 11:25**To** EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

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

Hello,

Over a number of years I have queried the plan for the Churchway estate, where I live, in regards to the Euston Area Plan. I have also been a member of residents groups in the past.

I have never had any kind of answer as to the future of the estate. It has been designated as a place of 'intensification' and/or had huge arrows of 'access' going through the buildings on some plans. The buildings are about to have a huge 'major works' bill which is doubly unjustifiable if the future of the buildings is short lived. As ever, there's the problem of different areas of administration not being in line with one another.

Who can I speak to to understand what is happening to my building? The plans I have seen over the years are unclear and inconsistent.

(I am a leaseholder, with ALL my money invested in my home, so I cannot overstate my concern about the effect of works on the value of my property).

Please can I get an answer on this, or at least direction on who to discuss it with.

Thank you

Dr Amanda Benson

[REDACTED]

Sent from my iPhone

[REDACTED]

R10



EUSTON AREA PLAN

From Anthony Jennings [REDACTED]**Date** Thu 05/03/2026 14:21**To** EustonAreaPlan <EustonAreaPlan@lbcamden.mail.onmicrosoft.com>

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

Dear Camden EAP,

Following your recent presentation, attended by Hero Granger-Taylor and myself, here are the comments of Bloomsbury CAAC:

Euston Square Gardens

We are concerned that the size, design and setting of Euston Square Gardens (important part of the Bloomsbury Conservation Area) should not be compromised in any way i.e. in size, that the gardens are not eroded in their total area (irrespective of proposed internal design changes), in design, that any redesign is classical in form (as distinct from the more modern design we were presented with at an earlier meeting which we consider inappropriate), and in setting, that the setting is not compromised in any way by encroachment by buildings, particularly of course anything high rise.

Euston Station

The draft EAP envisages an integrated design for the HS2 and mainline stations. However, our understanding is that under the HS2 Act, Camden are no longer able to handle any planning application for the HS2 part of the station, and it is now only the planning authority for the existing station. This being so, if HS2 are the authority for the HS2 site and Camden only for the existing site, how is an integrated design to be developed? How are planning applications to be handled and discussed?

Regards,

Anthony Jennings

For Bloomsbury Conservation Area Advisory Committee

[REDACTED]