

Euston Area Plan

Proposed Modifications to Submission EAP

Statement of Common Ground with English Heritage

The following table sets out the proposed modifications to the Proposed Submission version of the EAP which are suggested to be made to address English Heritage representations, with English Heritage comments in the final column. In its representations English Heritage also noted that it has worked with the Council throughout the production of the Euston Area Plan and in general welcomed the production of this plan. This statement of common ground covers all the representations from English Heritage where they considered the plan to be unsound.

Each representation has been addressed, with proposed modifications to the Euston Area Plan text, and Appendix 3 of the EAP Background Report, following discussion between the EAP team and English Heritage. Please see the Annex to this Statement for the proposed detailed wording changes to EAP Background Report Appendix 3.

| Section | Comment | EAP Position Response/Proposed Change | EH Response |
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| 3.3 - Tall buildings (p49) | <p>In general English Heritage welcomes the clarity provided on building heights proposed through the Euston Area Plan through a building heights plan and parameters for taller elements. The provision on page 49 of a rationale for the proposed height limit of 60 metres, which responds to our comments on the previous draft, is also welcomed.</p> <p>It is crucial that the 60 metre height parameter proposed, and the indicative heights shown in Figure 3.4, should be subject to consideration of local impacts. For example, buildings of 60 metres could be visible in local views, and have the potential to cause harm to heritage assets through impacts on the settings of listed buildings and conservation areas.</p> <p>It should be made clear in the third paragraph of page 49 that any proposals, even those which reflect the indicative building heights set out in Figure 3.4, should be rigorously tested</p> | <p>Whilst Appendix 3 to the EAP Background Report provides an initial assessment of taller buildings in the locations identified in Figure 3.4 of the EAP, it is noted that further assessment of impacts on local views (as well as the London View Management Framework) would be needed as part of any planning application for development at Euston.</p> <p>It is therefore agreed the suggested changes should be made as proposed. It is suggested that the proposed reference to 'Appendix 3' should read "<u>Appendix 3 of the EAP Background Report</u>" for clarification.</p> | <p>English Heritage's initial comments should be considered also in light of subsequent developments to the evidence base, which introduced greater clarity of likely impacts.</p> |

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| | <p>for impacts on surrounding heritage assets, using the methodology set out in English Heritage’s Guidance on the Setting of Heritage Assets (2011).</p> <p>Appendix 3 should then be cross-referenced as a piece of evidence which provides further detail on the potential for impacts from taller buildings on surrounding heritage assets.</p> <p><i>To reflect this we suggest that the paragraph be reworded as follows:</i></p> <p><i>"General heights that may be appropriate for new development are illustrated in figure 3.4, and are based on an analysis of the surrounding built context and modelling of potential impacts on strategic views and selected local views. The general heights shown would allow development that does not encroach into background or foreground assessment areas identified in the London View Management Framework (LVMF), <u>however, there may be impacts on local heritage assets which would need to be addressed (please see Appendix 3 for further detail)</u>. In the Background Assessment area there are potential locations for tall buildings (up to 60 metres) in the shadow of St Paul’s Cathedral. However, a full justification and demonstration of impacts in terms of the requirements of the LVMF <u>and local views</u> would need to accompany proposals for tall buildings in these locations.</i></p> <p><i>The heights shown are measured from an average ground level using a general storey height of three metres; therefore where development is above station buildings or infrastructure this will need to be taken into consideration. Within the background</i></p> | | |
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| | <p><i>assessment areas any building proposed taller than the general heights indicated in figure 3.4 Any proposals should be thoroughly tested against the LVMF. An impact assessment should demonstrate that the proposal does not unacceptably impact on strategic and local views (including views from adjoining boroughs, such as those from Regent's Park and views identified in the EAP Background Report), the character of the surrounding area including the settings of heritage assets (see English Heritage Guidance on the Setting of Heritage Assets, 2011), and that it contributes positively to the London skyline. Where buildings currently detract from existing protected views, the consideration of the potential for redevelopment to contribute to the enhancement of these views will be encouraged. Tall buildings should be designed to have a minimum impact on neighbouring properties and have a clearly defined relationship with the streets, buildings and uses around it."</i></p> | | |
| <p>3.3 - Tall buildings (p49)</p> | <p><i>As part of subsequent discussions with the EAP team, English Heritage have also highlighted the need for further changes to the EAP text in order to address potential impacts on the setting of Chester Terrace when viewed from the Inner Circle of Regent's Park, in association with further analysis provided in Appendix 3 to the EAP Background Report.</i></p> <p>English Heritage requested further work to address concerns about the robustness of the modelling in Appendix 3. As part of an evidence-led approach English Heritage has requested further changes to the plan text to address these further findings.</p> | <p>It is suggested that the following text is added to the end of paragraph 2, p49 of the EAP:</p> <p><u>"It should be noted that testing of building heights in Appendix 3 to the EAP Background Report shows that a 60m tall building to the north of the station would have an impact on the setting of Regent's Park and the grade I listed Chester Terrace. The Regent's Park Conservation Area Appraisal notes that a key element of the view from Regents Park to Chester Terrace is being able to see a clear roofline (without buildings in the background). There is a need to have special regard to</u></p> | <p>The acknowledgement that there will be an impact on the setting of important heritage assets is welcomed. However, the implication that the subsequent policy references create is that this consideration is of limited importance. This is concerning as the NPPF advises that plans should seek to overcome impacts highlighted in the evidence base. The implicit encouragement of tall buildings in this location is of even greater concern as there has been no assessment of the significance for the heritage assets affected and their setting as part of this Plan.</p> |

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| | | <p><u>the setting of listed buildings when considering development proposals. The NPPF (see paragraphs 131-134) and London Plan (policy 7.7 and paragraph 7.25) seek to protect heritage assets and their settings, and highlight that proposals will be resisted unless it can be demonstrated that any harm to or loss of significance caused is necessary to achieve substantial public benefits that outweigh that harm or loss. The NPPF also states that the more important the asset is, the greater the weight should be given to its conservation.</u></p> <p>(It is also suggested that in paragraph 2 of p49 a new paragraph is started from "In the Background Assessment area there are..." in order to read better and to avoid excessive paragraph size)</p> | <p>Additionally, English Heritage considers that the references to the NPPF and the London Plan confuse matters. While the reference to the Conservation Area Appraisal adds an important and specific policy consideration that would apply to new buildings in this location, the NPPF and London Plan are generally applicable to planning applications in London and are not a key finding of this document. English Heritage considers the Key Findings in Appendix 3 and the Plan would be clearer if they focused on the results of the evidence base.</p> <p>For these reasons a statement of fact like: "a building would need to be less than 60m tall to not be visible in the protected local view and to not affect the setting of important heritage assets including Regent's Park and Chester Terrace" would be a more useful piece of commentary in the appendix, and reference in the Plan. Please see English Heritage's suggested wordings for both p.49 of the Plan and for the Key Findings of Appendix 3.</p> |
| <p>Background Report Appendix 3</p> | <p>Since the publication of the consultation draft further detail has been added to the tall buildings evidence paper within the Background Report, Appendix 3. This section, and the policy implications which fall from it, are the focus of our representations; we have concerns that the modelling provided suggests, within certain local views, the potential for harm to heritage assets as a</p> | <p>Detailed concerns addressed below.</p> | |

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| | <p>result of impacts on settings, contradicting some of the key findings contained in the Appendix. We are also concerned that the methodology provided for the modelling is not sufficiently informed by considerations of impacts on the setting of heritage assets to be considered fully robust. We set out our concerns in more detail below.</p> | | |
| <p>Background Report Appendix 3</p> | <p>As set out in English Heritage/CABE's Guidance on Tall Buildings, we encourage Local Authorities to model the impacts of building heights and forms to inform the decision-making and place-making process as part of a development plan-led approach to the management of tall buildings (paragraph 2.9). We are therefore pleased that the Council has decided to model the impacts of the taller elements proposed within the Euston Area Plan; the Euston Area and its surrounds are particularly sensitive to impacts on heritage assets given the high concentration of listed buildings, including many listed Grade I and II*, and designated Areas such as Conservation Areas and Registered Parks.</p> <p>However, it is crucial that such modelling is carried out in a comprehensive manner, to ensure that the conclusions drawn can be considered to be robust and reliable. We have concerns that the current draft does not provide a sufficient assessment of impacts on the settings of heritage assets in local views. English Heritage has published Guidance on the Setting of Heritage Assets (2011) to assist Local Authorities and developers in identifying the impacts of potential development proposals on the historic significance of heritage assets. The methodology set out in the document is widely used by the development sector and we would encourage</p> | <p>Please see response against individual comments below in relation to the conclusions drawn in Part B Key findings.</p> <p>It is proposed to amend the methodology section part of B (local views) to highlight that the images and accompanying photographs provided are indicative only, and any planning applications proposing taller buildings would be required to provide Accurate Visual Representations (AVRs) to establish in detail the potential impacts: Please see proposed changes to Appendix 3 Background Report.</p> | <p>In order that the modelling exercise is worthwhile, the results should feed through into observations that minimise risks or impacts. This has been avoided where the risks are most apparent and most serious from a heritage perspective.</p> |

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| | <p>the Borough to adopt it within this modelling exercise. Below we provide more detailed suggestions on how the methodology could be made more robust, in line with this guidance.</p> <p>Following from these observations we would question some of the conclusions drawn in Appendix 3 and would urge the Council to revisit them following our recommendations above. In its current form, English Heritage would not support some of the conclusions drawn in the Appendix.</p> <p>We have therefore made a number of suggestions which we hope the Council would consider as the basis for a revised draft.</p> | | |
| Background Report Appendix 3: figure 2 | While the EAP notes (p.49) that building heights shown are measured from an average ground level using a general storey height of three metres, it may be worth reiterating this in appendix 3 in relation to figure 2, for clarity. | <p>This clarification has been assessed underneath Figure 2 as requested.</p> <p>Please see proposed changes to Appendix 3 Background Report.</p> | Agreed |
| Background Report Appendix 3: Introduction / Part B | In subsequent discussions, English Heritage highlighted that, in addition to any work on local views, a planning application would need to be fully assessed in relation to potential impacts on the settings of heritage assets. | <p>Additional text has been proposed in the Introduction to Appendix 3, and the Methodology of part B highlighting that applicants would also be expected to undertake an assessment of the impact of tall buildings on the setting of affected heritage assets.</p> <p>Please see proposed changes to Appendix 3 Background Report.</p> | Agreed |
| Background Report Appendix 3: Introduction | <p>Introduction</p> <p>Given the importance of this appendix in identifying parameters of development we would recommend that the introductory paragraph be extended to provide a more comprehensive explanation of the context for this study. It should note the sensitivity of the Euston Area and its surroundings due to the high concentration of heritage assets; offer a</p> | It is proposed to amend the introduction to reflect these comments with additional text highlighting policy requirements. Additional text has also been proposed in the introduction to highlight the historic sensitivity of the Euston area in order to provide a balanced context, as requested in subsequent discussions with English Heritage. | Agreed |

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| | <p>brief synopsis of the policy background to the tall buildings modelling, including relevant references from English Heritage/CABE's Guidance on Tall Buildings (2007), English Heritage's Guidance on the Setting of Heritage Assets (2011) and Seeing the History in the View (2011); and establish a definition of 'tall buildings', with reference to those provided in the local plan and in the London Plan. Relevant factors in determining the acceptability of taller buildings should include the impact on the settings of all relevant heritage assets (listed buildings, scheduled monuments, registered parks and gardens and conservation areas).</p> | <p>In subsequent discussions English Heritage also requested that the introduction defines what is considered to be a tall building for the purposes of the assessment. A definition has therefore been provided at the start of the introduction.</p> <p>Please see proposed changes to Appendix 3 Background Report.</p> | |
| <p>Background Report Appendix 3: Methodology</p> | <p>Methodology: This section should explain why a height of up to 60m is considered for assessment. Although this becomes clear later in the document, it appears unexplained at this point.</p> | <p>It is proposed to amend the methodology to briefly explain why a height of up to 60 metres is considered for assessment. Please see proposed changes to Appendix 3 Background Report.</p> | <p>Agreed</p> |
| <p>Background Report Appendix 3: Part A</p> | <p>Part A – Tall Buildings and London View Management Framework Views</p> <p>We welcome the intention to establish and test indicative buildings heights parameters. However, the heights established should be clearly justified in the text to clarify why the building heights shown in figure 2 are considered acceptable.</p> <p>Views Assessments: for clarity the viewing corridors should be labelled as such, and in the format used within the LVMF. As currently shown they could be mistaken for the outline of a proposed building. In each case the 3D modelled views should be at the same scale as the photographic views.</p> | <p>It is proposed to add text at the beginning of Part A to briefly set out how the building heights in Figure 2 were established. A key will be added to better explain the viewing corridors shown in the extracted images from the LVMF.</p> <p>Changing the scale of the model to match photographic views is not considered appropriate as it becomes hard to view the impacts - therefore it is not proposed to do this. However where images are differing scales this will be clearly stated. Further text will also be added to explain that more detailed testing of the impact of any proposals on the LVMF will be required as part of any planning applications proposing taller buildings in line with the LVMF</p> | <p>Agreed</p> |

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| | | methodology. Please see proposed changes to Appendix 3 Background Report. | |
| Background Report Appendix 3: Part B (introductory paragraph) | In subsequent discussions English Heritage highlighted that 'local views' can contain views of nationally important buildings * that are therefore of more than 'local' significance. *and affect the experience of nationally important designed landscapes and that they | An additional sentence is proposed at the end of the introductory paragraph to Part B highlighting that local views can have wider importance as a result of significant buildings within the view.* Please see proposed changes to Appendix 3 Background Report. *and impacts on how a historic designed landscape is experienced. | Partially agreed: See additional comments. |
| Background Report Appendix 3: Part B (methodology) | Part B Tall buildings and local views Methodology: an explanation should be provided of how the local views were identified. The location plan of taller buildings and local view points is welcomed, however we would suggest that the heritage assets plan be overlaid to show where views relate to the character and appearance of particular conservation areas and to the settings of listed structures. | Additional text is proposed to be added to the methodology section at the start of Part B to explain the rationale for the local views selected and also to highlight that these views do not represent a finite list of views which may need to be tested when considering any planning applications in the future. Listed buildings and conservation areas will be overlaid onto the plan for ease of reference as suggested. Please see proposed changes to Appendix 3 Background Report. | Agreed |
| Background Report Appendix 3: Part B (Key findings) | Part B Tall buildings and local views Key findings: English Heritage does not support the conclusions drawn here, including whether taller buildings would not be considered to cause significant harm to certain local views. Given that harm cannot be ruled out at this stage, we would recommend that the conclusions be altered to simply state instances where there may be the potential for harm, rather than providing a judgement on the degree of harm this may cause. Specifically: | A number of amendments are proposed for the 'Key findings' section of Part B to identify areas where there may be potential for harm and avoiding judgement regarding likely impacts in advance of a planning application. Please see proposed changes to Appendix 3 Background Report. | English Heritage still has concerns about the conclusions drawn here, including whether taller buildings would cause significant harm to certain local views and the setting of the heritage assets within them. While some of the wordings have been improved, those, particularly in relation to view 24, prevent us from agreeing to the proposed changes to the Background Report and to the Plan. Also see our |

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| | <p>3. "Taller buildings would be visible along Upper Woburn Place towards Eversholt Street but these views would not appear to significantly affect the setting or appearance of St Pancras Church." This judgement should be reserved until a planning application has come forward for consideration.</p> <p>5. "Whist taller buildings would also be visible from other local views from conservation areas, would not be considered to cause significant harm to these views". This judgement should be reserved for planning applications. However, we would consider proposals for taller elements shown in views 24 and 28 as harmful to the setting of Regents Park Registered Park and the listed terraces which front the park.</p> | | <p>comments in relation to 3.3 - Tall buildings (p49) above.</p> |
| <p>Background Report Appendix 3 (local views analysis)</p> | <p>Part B Tall buildings and local views Local Views analysis:</p> <p>To fully understand the potential impacts on surrounding heritage assets, local views analysis should follow the methodology set out in English Heritage's Guidance on the Setting of Heritage Assets (2011). This would require:</p> <ul style="list-style-type: none"> • A photo of each view as existing; • Identification of the heritage assets present in each view identified, and the significance attributed to each, including by virtue of setting; and • The impact of proposals on the significance to be identified. <p>We suggest that each view be accompanied by a commentary providing an indication of possible impacts on significance.</p> | <p>In order to address these concerns it is proposed to identify key heritage assets in views and summarise their significance and setting issues, and the potential impacts of development on any views.</p> <p>Commentary is proposed as suggested along with photographs of the heritage assets identified as impacted on in the views. Alongside this, following a request from English Heritage during subsequent discussions, the local view images have been refreshed from the versions provided in the proposed submission version of the Background Report.</p> <p>Additional text is also proposed to highlight that the views selected are not an exhaustive selection and that other views may need to be tested for impact depending on the type of development proposed. Applicants should discuss the</p> | <p>We note that the revised images show the impacts would be greater than initially thought. For example, the impact on view 24 now shows that the visible element of a tower in location B would be twice as tall as originally shown. This would not only interrupt the roofline of the historic terrace, but would make a tower a dominant feature in relation to the setting of the terrace, and within the view more generally as it is focused on the built form at the end of the road.</p> |

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| | <p>For example:</p> <ul style="list-style-type: none"> • View 5: Gordon Street/Euston Road junction to Euston Station – the proposal shown could have settings impacts on the Royal College of General Practitioners, listed Grade II*. • View 10: There could be setting impacts on the Church of St Mary the Virgin, Grade II listed. • View 24: the terraces shown, viewed from Chester Road / Inner Circle junction looking east towards Euston Station are Grade I Listed. Proposals for a tall building visible above their rooflines would be considered as harm and would not be supported. | <p>extent of views testing and information required with Camden, GLA and English Heritage on a site by site basis and should follow guidance set out in the wider planning policy framework.</p> <p>Please see proposed changes to Appendix 3 Background Report.</p> | |
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