

## Euston Area Plan Examination

### Matters, issues and questions for the Hearing sessions

#### Matter 6 Heritage – EAP Team Responses

*Question 6.1: How have English Heritage helped shape the Plan's proposals affecting the listed buildings, structures and spaces across the Plan area?*

- 6.1.1 English Heritage has helped shape the Plan's proposals and content throughout its development in numerous ways. At the outset the EAP team met with English Heritage to outline draft objectives for the plan, the plan area and discuss how best to ensure heritage issues were fully considered. At this stage, English Heritage recommended the production of a Historic Area Assessment for the plan area, which was subsequently commissioned to provide a deeper understanding of the historical development and significance of the Euston area to inform plan production. English Heritage helped with the scope of the tender brief and liaised with both the EAP team and the successful consultants, Allies and Morrison Urban Practitioners, to shape and inform the content of the Assessment.
- 6.1.2 English Heritage provided comments on the drafts of the Historic Area Assessment, along with the local Camden Conservation Area Committees, and the historic advisors from Camden Council, the GLA and TfL. The Assessment highlights significant, sensitive designated and undesignated heritage assets, and has been used to inform proposals for change in the EAP.
- 6.1.3 Alongside this, as masterplan proposals for the plan area were developed by the team, meetings were held at appropriate points with English Heritage to share emerging key proposals and allow them to inform the development of the masterplanning and direction of travel. English Heritage were also consulted as statutory consultees on the draft Euston Area Plan and the Proposed Submission version of the plan and we are seeking to address outstanding concerns regarding Appendix 3 of the Background Report, local views, and hope to agree a Statement of Common Ground prior to the Examination hearings. We have held meetings to discuss amendments to Appendix 3 of the Background Report and made good progress in addressing the concerns expressed in English Heritage's representations.

*Question 6.2: How realistic is the Plan's approach to the potential reinstatement of the Euston Arch?*

- 6.2.1 The reinstatement of the Euston Arch has been raised as an aspiration by various groups and representors throughout the evolution of the Plan. The EAP team have liaised with the Railway Heritage Trust, whose extensive knowledge on the history of Euston Station has informed the EAP Historic Area Assessment (document EED4) and the approach taken to the Euston Arch in the EAP. The Trust note in their representation that the Plan includes provision for the replacement of the Euston Arch in the site they suggested, which is in the vicinity of the historic axis of Drummond Street.
- 6.2.2 Whilst the Plan does not require the reinstatement of the arch, text on page 74 supports the rebuilding of the arch subject to development viability considerations or securing separate funding. The Secretary of State, in his statement on 17<sup>th</sup> March 2014, gave a firm indication that the Euston Arch should be included in the redevelopment proposals for the station and related over site development. In the same statement the SoS asked HS2 Ltd and Network Rail to develop proposals for a level deck station at Euston. As part of this work it is envisaged that Network Rail and HS2 Ltd will work to develop plans that allow for the reinstatement of the arch, and consider mechanisms for funding the reinstatement of the arch, working with the Euston Arch Trust, who are campaigning for its reinstatement
- 6.2.3 It is therefore considered that the plan's flexible approach in providing guidance for the location of the reinstatement of the arch but noting the potential mixed nature of its funding is appropriate in the context of the Secretary of State's requirements.

*Question 6.3: Does the Plan successfully address the issue of building height and tall buildings in the context of the London View Management Framework (LVMF), and with particular regard to Figure 3.4 and Appendix 3 of the Background Report?*

- 6.3.1 Figure 3.4 of the EAP provides indicative building heights for the main development sites across the Euston area, including indicative locations for taller buildings.
- 6.3.2 Strategic Principle EAP2 (C) states that there may be some opportunities for taller buildings in the Euston area, whilst acknowledging that the strategic viewing corridors will limit heights, and design, heritage and other policy considerations will also influence the approach taken.
- 6.3.3 The EAP supporting text (p49) indicates that taller buildings up to 60 metres in the identified locations would fall within the shadow of St Paul's Cathedral, but also states that a full justification and demonstration of impacts in terms of the requirements of the LVMF and local views [*underlined text: proposed change in*

*response to English Heritage representations]* would need to accompany proposals for tall buildings in these locations.

- 6.3.4 In developing the overall approach to building heights in the EAP area (as set out in Figure 3.4), regard was given to a range of considerations, including:
- Factors indicating the need to maximise appropriate development density in the Euston area, including growth area designation, its central London location, excellent public transport accessibility and its potential role as a major economic driver within London’s Central Activities Zone;
  - The strategic viewing corridors, which would limit the height of potential developments across much of the Euston area (see *Strategic views* below);
  - Surrounding built context, including prevailing building scale/ height, heritage assets and their settings (see also *Local views* below);
  - Residential amenity issues, for example potential impacts on sunlight and daylight and outlook from neighbouring properties;
  - Wider factors such as open space provision, supporting facilities and services and connectivity were also taken into account in developing the approach taken to building density.
- 6.3.5 The approach taken to taller buildings in the EAP therefore seeks to balance the drivers for growth in the Euston area with a range of other factors, including strategic and local views as well as wider social and economic factors. It provides a flexible framework to guide development by indicating areas where taller buildings could be provided, whilst emphasising that detailed proposals for taller buildings would need to be informed and justified by a rigorous assessment of impacts, including on strategic and local views.
- 6.3.6 The EAP team has liaised on an ongoing basis with English Heritage in the production of the Euston Area Plan, including in relation to local and strategic views. We are seeking to address outstanding concerns from English Heritage regarding Appendix 3 of the Background Report, local views (see below), and hope to agree a Statement of Common Ground prior to the Examination hearings
- 6.3.7 The following text sets out how the EAP (including Figure 3.4) addresses the issue of building height and tall buildings in the context of the London View Management Framework (LVMF) and local views, supported by EAP Background Report Appendix 3.

### **Strategic views**

- 6.3.8 In relation to potential impacts on the LVMF strategic views, the indicative locations where taller buildings could be provided were informed by the analysis provided in Appendix 3, Part A of the EAP Background Report, which found that taller buildings could be provided in two areas (locations ‘A’ and ‘B’) with limited impact on strategic views. Key findings from this assessment are set out below:

- *Panorama from Assessment Point 5A.2 Greenwich Park: the General Wolfe Statue - looking toward St. Paul's Cathedral:* The taller building at location 'A' lies in the Wider Setting Consultation Area in the background of St. Paul's Cathedral. It will be 'hidden' behind St. Paul's Cathedral from this viewpoint.
- *Panorama from Assessment Point 6A.1: Blackheath Point near the orientation board - looking toward St. Paul's Cathedral:* The taller building at location 'B' lies in the Wider Setting Consultation Area in the background of St. Paul's Cathedral, but would be hidden behind St. Paul's Cathedral.
- From all other identified strategic viewpoints (Assessment Points 2A.1, 2A.2, 2B.1, 4A.1 and 4A.2) the taller buildings would lie outside the Landmark Viewing Corridor and the Wider Setting Consultation Area. However, they would appear within the wider panoramas, and would be visible in the context of a number of other tall buildings and landmarks.
- The redevelopment of 1 Eversholt Street with more sensitive, lower height development could open up the view from Primrose Hill towards St. Paul's Cathedral, thus significantly enhancing the setting of St. Paul's Cathedral. Page 49 of the EAP states that 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.

## Local Views

6.3.9 EAP background Report Appendix 3 Part B provides an initial assessment of potential impacts of taller buildings in the identified locations 'A' and 'B' on local views. It identifies local views where careful consideration of impacts on the setting of heritage assets would be required as part of any planning application. The key findings of the assessment are provided below:

- Taller buildings in both of the identified locations would be largely visible from streets in their immediate vicinity, but would appear to reflect and respond to the existing varying streetscape in the Euston area.
- Taller buildings in the identified locations would largely be hidden in local views from Regent's Park, particularly in views from the area east of The Broadwalk. However, they are likely to be visible from specific points in the western areas of Regent's Park where the view is not blocked by trees, in particular the junction of Inner Circle and Chester Road (View 24). Whilst other taller buildings also appear to the east of the terraces along Chester Terrace/ Cumberland Terrace, detailed consideration would need to be given to the impacts of any new taller buildings on views from Regent's Park. English Heritage have highlighted potential significant adverse impacts on the setting of the Grade I listed Chester Terrace when seen from this view point, and have advised that any taller building in Location B should seek to preserve the clear roofline of the terrace when viewed from this location.
- A taller building in location B would be visible along Upper Woburn Place towards Eversholt Street, and therefore could impact on the setting of the Grade I listed St Pancras Church and Grade II\* Listed Euston Fire Station.

- A taller building in location A would be visible from Gordon Street (see View 5), and consideration should therefore be given to potential impacts on views of the Grade II\* Listed 1-9 Melton Street.
- Taller buildings would also be visible from other local viewpoints, including from conservation areas, and locations with views of listed buildings and non-designated heritage assets.

6.3.10 Page 49 of the EAP highlights that an impact assessment should demonstrate that a development proposal would not unacceptably impact on local views, including from Regent’s Park. The assessment in Appendix 3 would therefore help to inform this assessment by highlighting potential points where careful consideration is required, including the area around viewpoint 24 of the assessment.

*Question 6.4: How will the Plan secure the enhancement of the following heritage assets:*

- *Church of St Pancras*
- *Euston Fire Station*
- *Euston Square Gardens*
- *Important assets in the North Euston Cutting area and within the Regents Park and Camden Town Conservation Areas*

### **Euston Square Gardens**

- 6.4.1 The plan seeks to secure the enhancement of Euston Square Gardens through encouraging their reinstatement (if HS2 construction requires the use of the gardens temporarily) and improvement at Development Principle EAP 2 and details the aspirations on page 84. In discussion with English Heritage, the plan requires that proposals for the gardens should be informed by a “detailed study of their historic significance, including the original layout and extent of remaining original fabric”. This should then inform design proposals for improvements or in replacing the gardens to enhance the Square’s historic significance.
- 6.4.2 The plan also encourages the gardens to be designed to be a more attractive place for users and to mitigate noise from Euston Road. The plan also encourages new development to front onto the northern edge of the gardens with active ground floor uses to enhance the use of the gardens and their setting. The setting of the gardens is currently undermined by the busy Euston Road, the current bus station design and by the design of the piazza and office blocks in front of the station.

**Euston Fire Station and Church of St Pancras**

- 6.4.3 Through both enhancing the gardens themselves and securing new high quality and sensitively designed development in front of the station, the setting of, and views to and from, neighbouring listed buildings, including the Fire Station and St Pancras Parish Church will be enhanced. This is noted on page 82 of the plan under “enhancing heritage assets”.
- 6.4.4 The proposed measures to improve the environment along Euston Road with landscaping and planters wherever possible will also significantly enhance the setting of these buildings, along with other heritage assets here including Friends House and the Royal College of General Practitioners building. It is anticipated that improvements to Euston Road will be delivered through the continuing work of TfL’s Roads Task Force which is looking at the future role of Euston Road, amongst other major roads in London, and ways to improve the environment around them over the next year.
- 6.4.5 The plan also proposes to introduce new or improve some retail frontages on Euston Road, to ensure this aspiration is considered for any redevelopment plans for these areas. It is suggested that this aspiration will be delivered through the appropriate design of new development.

**North Euston Cutting and adjacent conservation areas**

- 6.4.6 In terms of heritage assets in North Euston Cutting, Development Principle EAP 3 requires that development proposals “should be sensitive to the historic context and seek to preserve the setting of heritage assets through sensitive design and scale”. The extent of development in the cutting is limited to the southern end of the cutting, and is designed to create a transition between the historic grand terraced homes to the north to the large scale tower blocks in Regents Park Estate to the south. The northern half of the cutting would either be left undeveloped, or if funding could be found, the cutting could be developed as public open space which would help to mitigate the loss of open space elsewhere in the plan area due to the construction of HS2 and provide green space for existing and new residents.
- 6.4.7 The design guidance set out on page 89 seeks to ensure that any development is designed to be sensitive to the historic context of Regent’s Park and Camden Town Conservation Areas, the Grade II listed terraced buildings on Mornington Crescent/Hampstead Road and Mornington Terrace, Grade II listed piers on Mornington Bridge and Grade II\* listed villas on Park Village East. The height of proposed development is scaled to reflect the surrounding properties. A maximum of 4-6 storeys is appropriate to the north of the development parcel identified, with up to around 10 storeys being identified as appropriate at the south of the development parcel close to Hampstead Road.
- 6.4.8 The Historic Area Assessment (document EED4) and Camden Town Conservation Area Appraisal (document CG5) notes that prior to 1906 Park Village East and Mornington Terrace had properties on both sides of the road, but the eastern and western sides respectively were demolished to widen the railway cutting to Euston

(see page 13). Therefore development fronting onto Park Village East at the southern end would partially restore the historic street pattern in a sensitive manner.