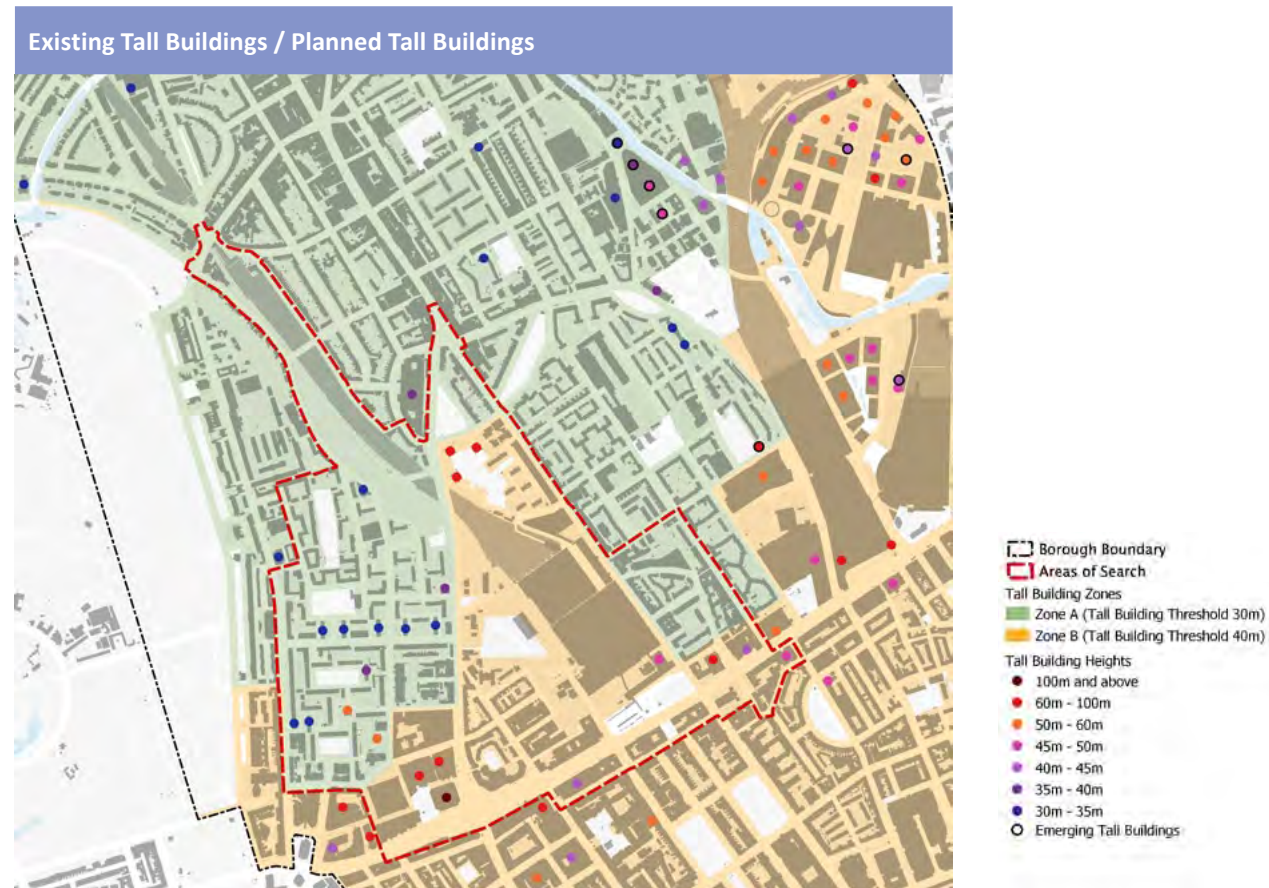


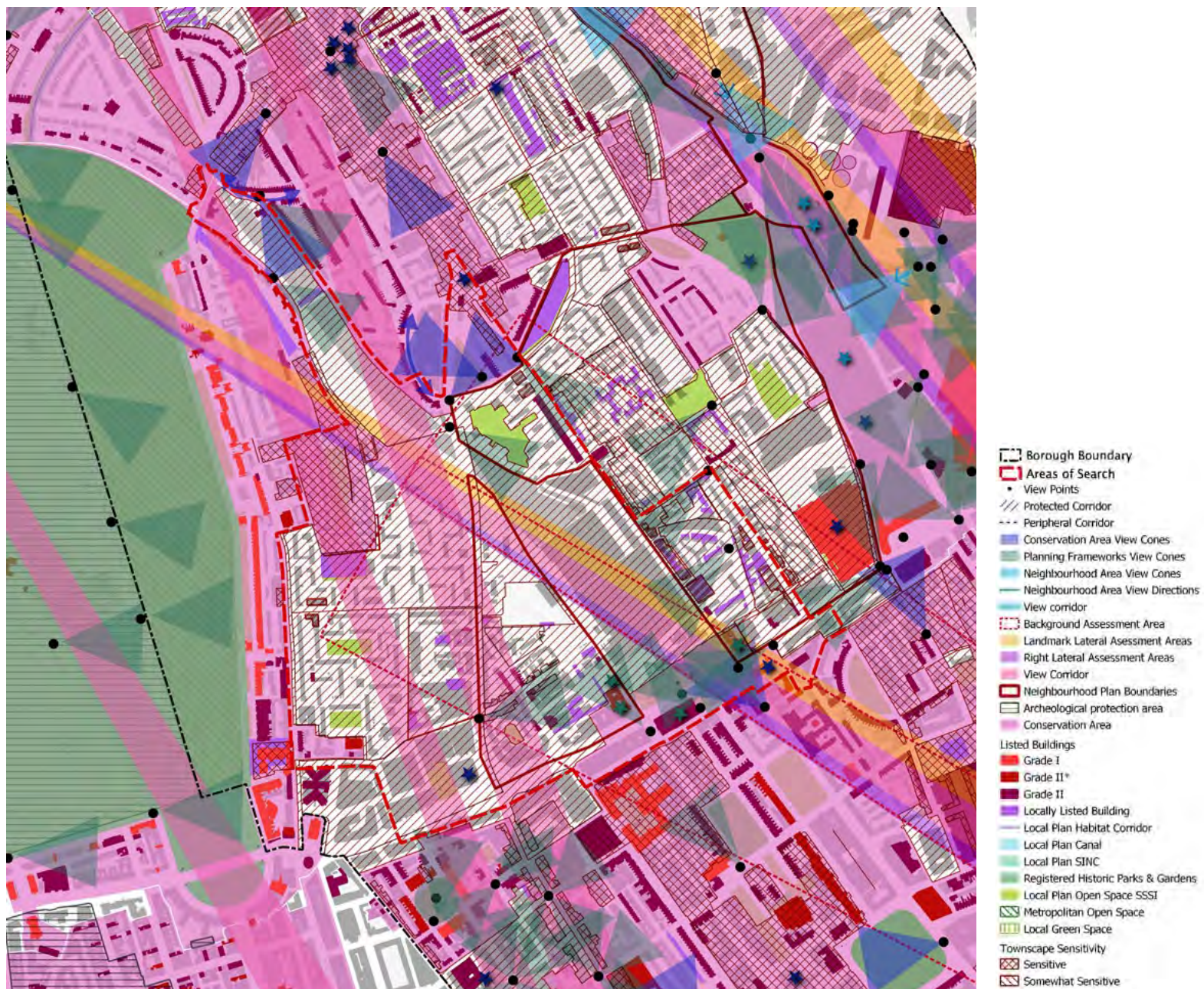


Tall Building Threshold

- The northern and western part of the area is situated in Zone A with a tall building threshold of 30m.
- The southern part of the site including the station and the area to the east of Hamstead Road are on Zone B with a tall building threshold of 40m.

Existing tall buildings

- There are 23 existing tall buildings in the area ranging between 31.1-83m (10- 26 Rst).
- Planned / emerging tall buildings are those developments that have been granted planning permission. The adopted EAP also indicates locations for new tall buildings, with additions included in the proposed updates.



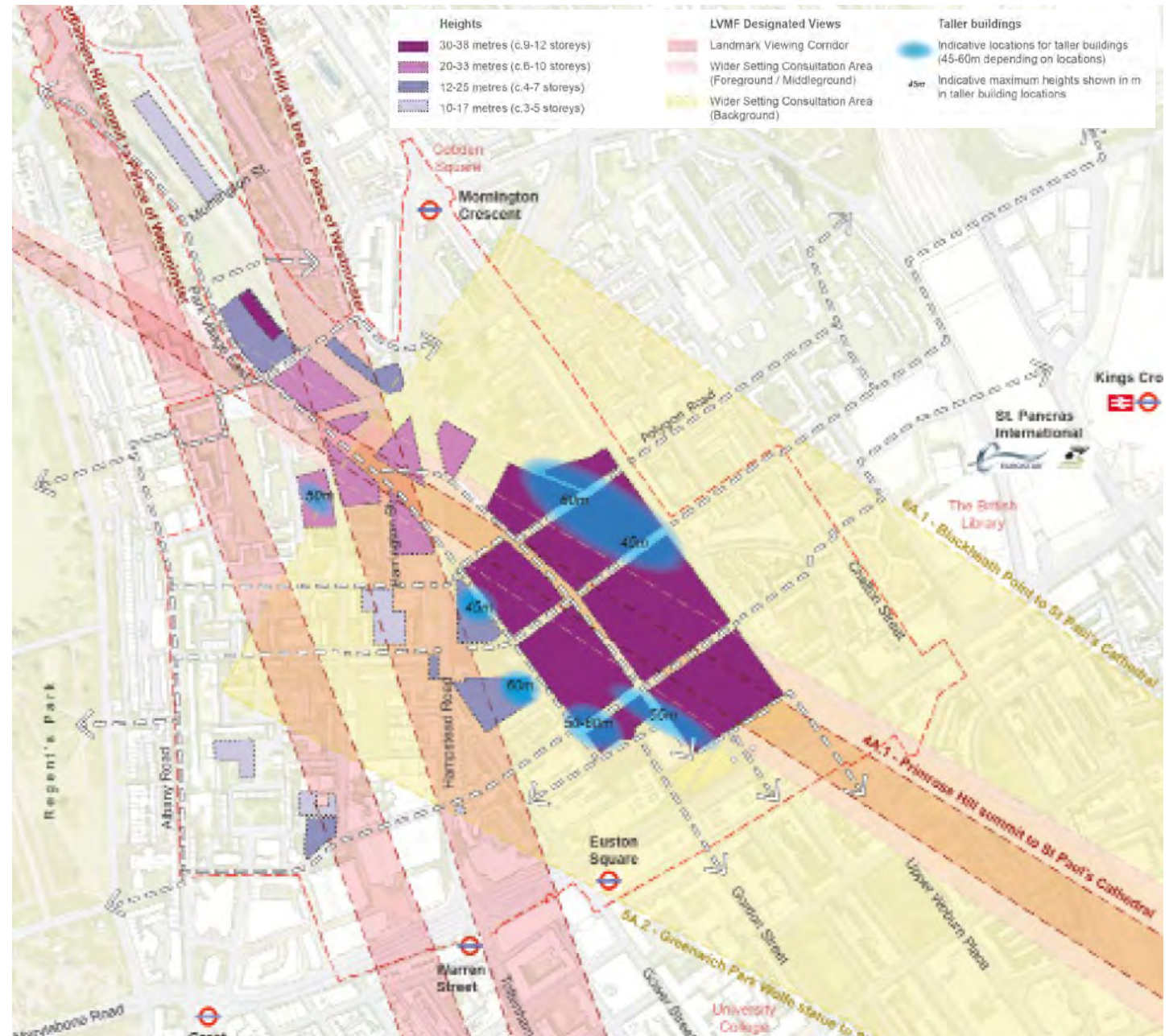
Plan of area with composite of sensitivities (Heritage, Townscape Sensitivity to tall buildings, strategic and local views, green space designations), identifying remaining Sub-areas of Search following exclusion of areas with planning consent.

SUMMARY OF EUSTON AREA PLAN HEIGHT APPROACH

The EAP (2015) states that given the area's location as part of the CAZ and its function as a major transport hub, it is a suitable location for optimising development and tall buildings in specific locations. The EAP and proposed update responds to the limits of deviation set out in the HS2 Bill and subsequent Act.

The EAP adopted in 2015 set out the approach to building heights for development sites in the area as reflected on the potential general building heights plan (pg. 283). The proposed updates to the EAP published for consultation in Jan 2023, continues the broad approach established in the adopted plan, suggesting some areas for increased heights including new locations for tall buildings.

Based on its analysis of the surrounding context, character and modelling of impact on strategic views the Consultation Draft EAP Update 2023 suggests a threshold for tall buildings at 45m. The adopted EAP 2015 identifies two potential locations for tall buildings in the shadow of St Paul's Cathedral. The draft EAP Update 2023 continues this approach to identify further potential locations where tall buildings of heights of 45 to 60m could be appropriate. These locations are situated on



EAP Illustrative masterplan to show potential general building heights (heights are indicative only) - EAP Consultation 2023.

REVIEW OF THE EAP IN THE CONTEXT OF THE TALL BUILDING STUDY

either side of the strategic LVMF view from Primrose Hill to St. Paul's Cathedral. All locations are situated in the backdrop to LVMF views from Greenwich and Blackheath to St. Paul's Cathedral.

The EAP states that heights up to 38m may not have an impact on the backdrop of strategic views from Greenwich and Blackheath, whilst acknowledging that technically the level of constraint is at 30m. It further states that taller structures could be promoted in this corridor where they are hidden behind the dome of St. Pauls Cathedral or other buildings. As a principle the study requires all structures over 30m, equivalent to 53m to 54.2m AOD, within the LVMF backdrop to be tested against their impact on the LVMF views.

In addition, the EAP identifies areas where four different general heights may be appropriate. These are:

- 10-17m (c. 3-5 storeys) in infill locations to the west of the station development area
- 12-25m (c. 4-7 storeys) in selected locations in the immediate periphery of the station development

- 20-33m (c. 6-10 storeys) above and adjacent to tracks in the north of the development area
- 30-38m (c. 9-12 storeys) above the station

The EAP acknowledges that these heights may have impacts on local heritage assets, local views and context, which will need to be addressed.

The EAP provides high-level design principles for tall buildings, which buildings above the tall building threshold of 45m will need to adhere to. Buildings above 30m and below 45m will need to be tested against LVMF views and local views and avoid harmful impacts.

GENERAL HEIGHTS

Proposed general heights in the EAP have been established based on local consideration for development and placemaking.

Generally greater heights (20-33m (6-10 Rst) and 30-38m (9-12 Rst)) are proposed above the tracks and the station, as part of comprehensive development. In principle this is a valid approach for a place making area and allows the development of a character of its own.

Lower heights of 10-17m (3-5 Rst) and 12-25m (4-7 Rst) are proposed in other areas with existing development and lower heights.

There are pockets of Victorian terraces to the west and east of the station (CH 12-15m), some of which are listed or locally listed. Whilst these areas are not part of a Conservation Area, their townscape is somewhat sensitive to development.

The post-war estate to the west of Hampstead Road already comprises of a greater range of heights (typically between 15m and 30m) including larger and taller buildings, and is generally of lesser sensitivity to buildings of greater height.

The proposed two lower height ranges correspond to the respective contexts and support contextual development whilst also providing some flexibility for modest local increase in height where appropriate.

Recommendations

The EAP requires development of the general height to respond to context and local views, and as such acknowledges other contextual constraints that development will need to respond to. The draft EAP Update 2023 (Station and Tracks chapter) suggests that "massing should be stepped back, have variation presenting breaks and avoiding coalescence of massing in the townscape, and stitch the development within the context".

However, it may also be useful for the Design Section of the EAP to include this general point and emphasise the need for stepping down towards lower rise context to avoid a cliff edge and sheer contrast in height.

TALL BUILDING THRESHOLD

The methodology by the EAP for establishing its guidance on tall buildings does not make reference to the existing local context heights within the area, which currently averages at CH 9-12m to 15-18m, but which also includes higher buildings up to 30m.

The EAP sets the tall building threshold for the entire AAP area to 45m. This could be problematic in peripheral areas of the EAP that are not promoted for transformative development. The lower prevailing context height in these areas could result in proposed development that is below the tall building threshold being locally considered as tall and contrasting with the existing fabric.

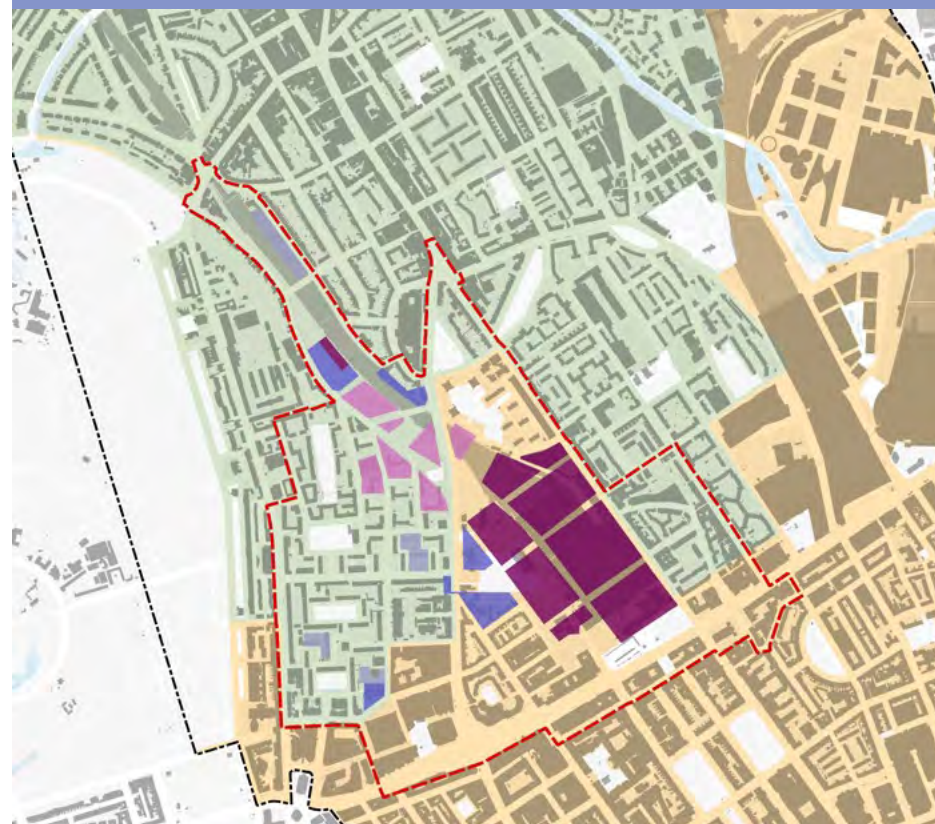
Recommendations

It is recommended for the EAP to adopt the same tall building thresholds as proposed by the building height study. Zone A, outside the Central Activity Zone, has a threshold of 30m, whilst Zone B, inside the Central Activity Zone has a threshold of 40m.

Similarly to the recommendations by the building height study, development that is below the respective tall building threshold is not automatically acceptable. It will need to be scrutinised in respect of its relation with and impact on the immediately surrounding context, especially where its height is significantly greater than the existing context height.

Notwithstanding if a building is above or below the tall building threshold, any building with heights greater than their context, and situated within or near of an LVMF view cone will need to be reviewed in respect of its potential impact on said view.

EAP Building Heights comparison



Overlay Draft Euston Area Plan Building Heights with Proposed Tall Building Thresholds (Option A)

- Borough Boundary
- Areas of Search
- Euston Area Plan Building Height Threshold**
- 30-38 metres (9-12 storeys)
- 20-33 metres (6-10 storeys)
- 12-25 metres (4-7 storeys)
- 10-17 metres (3-5 storeys)
- Tall Building Zones**
- Zone A (Tall Building Threshold 30m)
- Zone B (Tall Building Threshold 40m)

TALL BUILDING LOCATION AND HEIGHT

The review of the EAP Tall Building Location and Height acknowledges that the station and adjoining area have been identified as a growth area and are in the CAZ, and that there are limited locations for tall buildings due to the LVMF viewing corridors passing over much of the EAP area.

The adopted EAP's locations for tall buildings gave significant weight to the impact on strategic LVMF views. Heights are proposed to be increased on either side of the viewing corridor from Parliament Hill to St. Paul's Cathedral that passes over the station area. Broad zones for tall buildings have further been shaped so as to potentially be hidden behind the dome of St. Paul's Cathedral or other existing buildings in the two LVMF views from Greenwich and Blackheath.

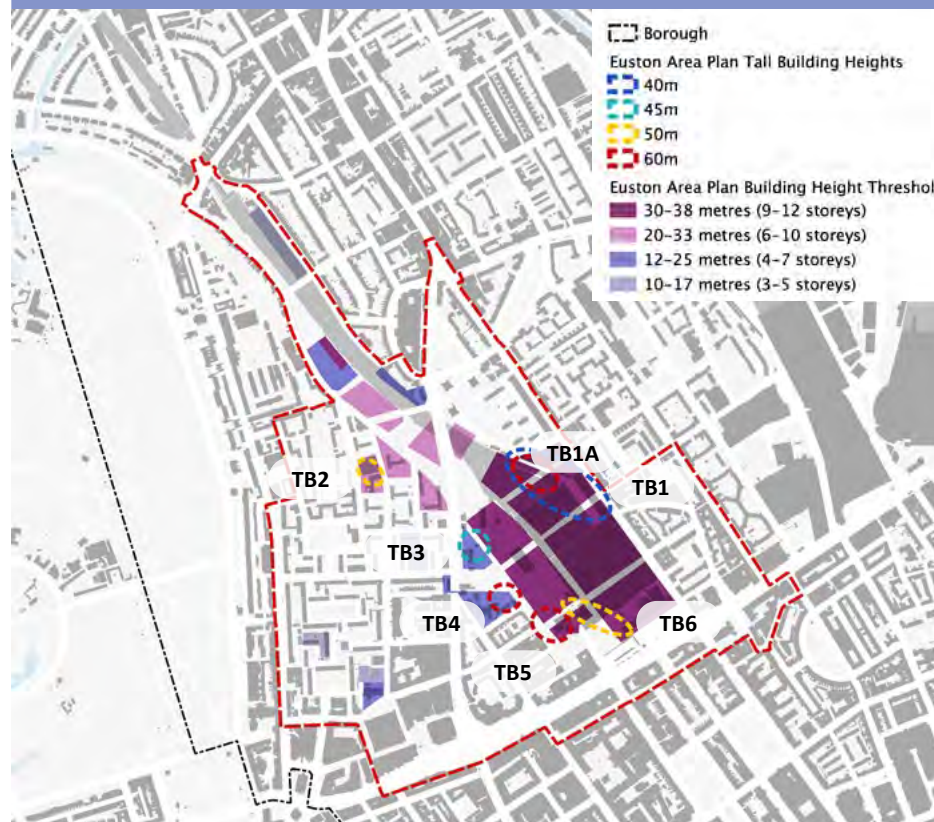
Issues identified:

- The locations of proposed tall buildings are informed by the LVMF which means that it is not possible to locate them centrally to the station redevelopment, where they would correspond to higher levels of activities and be visually associated with the station. This approach will

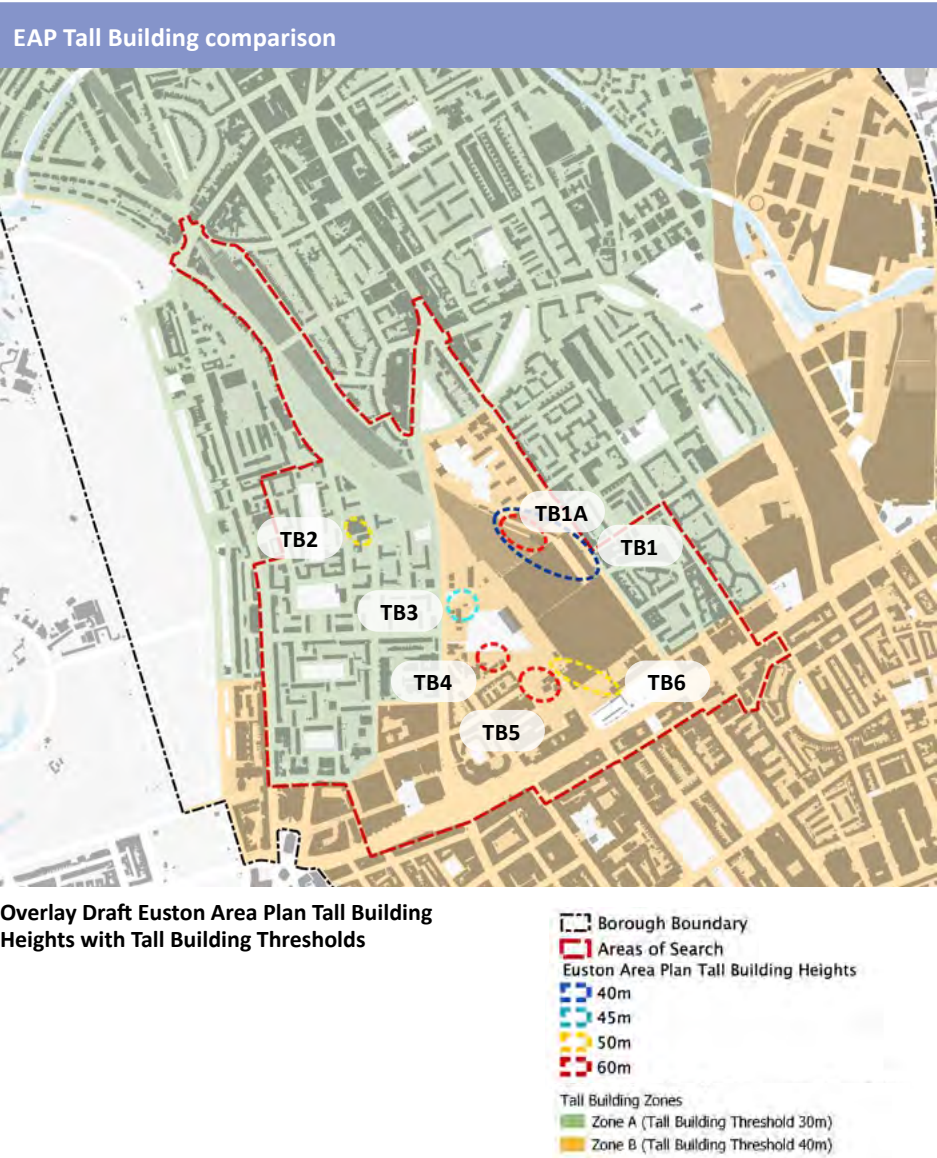
need to emphasize how best to integrate tall buildings as part of a placemaking approach.

- Tall buildings would be located in peripheral locations to the EAP at the edge of the station development area. Therefore, where tall buildings directly interface and contrast with the existing lower rise context, every opportunity should be taken for sensitive integration with their context and to minimize their impact on local character.
- In translating the recommendation of broad tall building zones behind St. Paul's Cathedral, individual tall buildings should not encroach in the silhouette of St. Paul's Cathedral and thereby weaken its clarity and integrity on the skyline. Development should not be visible in views from around the official viewpoint, and thereby weaken the impact and value of the view.

EAP Building Heights



Building Height diagram (as per Draft Euston Area Plan)



TB Code	Proposed EAP Max Height	Existing / Proposed Context height	Tall Building Threshold as per TB study	Defined as Tall Building	Context height ratio	Tall building Classification in their immediate context
TB1	45m	34m (proposed)	40m	Yes	1.3 x CH	Large building
TB1A	60m	34m (proposed)	40m	Yes	1.8 x CH	Lower local scale TB
TB2	50m	26m (proposed)	30m	Yes	1.7 x CH	Lower Local Scale TB
TB3	45m	18m (proposed)	40m	Yes	2.5 x CH	Local scale TB
TB4	60m	18m (proposed)	40m	Yes	3.3 x CH	District scale TB
TB5	50-60m	34m (proposed)	40m	Yes	1.5-1.7 x CH	Large building/ Lower Local Scale TB
TB6	55m	34m (proposed)	40m	Yes	1.6 x CH	Large building

Table representing the context height, tall building threshold, context height ratio and tall building classification of proposed tall building locations by the EAP (* Proposed context height is the midpoint of the EAP potential general building height range)

EAP’s proposed tall building heights range from 45m up to 60m.

The 60m (c. 18 Rst) upper threshold is relatively modest in the context of new tall buildings being brought forward in London, which is principally due to the restrictions by the backdrop of LVMF views from Greenwich Park and Blackheath as discussed above.

In absolute terms, the highest buildings are situated in or adjacent to the re-development area of the station, whilst heights drop slightly in locations to the west (TB2 and

TB3). This will help to reinforce the legibility of the station development on the skyline.

TB5+TB6, at the front of the station, and TB1A, at the back of the station, are located apart from each other, and will not be seen as part of the same cluster.

Both clusters may be of the same height at the skyline and do not express the significance of their location through their height.

Consideration should be given to expressing the station front and entrance on the skyline through a

principal high point, relative to the heights of the cluster at the back of the station (TB1A) to signal that this is sub-ordinate to the station front (TB5+TB6) and thereby assist with legibility.

The review of the context height ratio of the tall building locations in respect of their surrounding context height (see table) shows that locations in the station development will only marginally stand out over their context, largely due to the increased proposed context heights here. The ratios range from Large Buildings (TB1, TB5, TB6) to Lower local scale TB (TB1A).

Adjacent to the station development, there are two further locations for tall buildings:

- TB3 at 2.5 x proposed CH is a local scale TB
- TB4 at 3.3 x proposed CH will be perceived as a district scale TB. However, TB4 will be viewed against the proposed CH of the area above the Station and Tracks which will partially ameliorate the perception of TB4's height.

Within the Regent's Park Estate, TB2 would be 1.7 proposed CH and would be perceived as a local scale tall building. The existing CH to the

north, south and east of TB2 is 8-9 storeys (26m-30m) which is similar to the proposed CH. The existing CH to the west is 4-6 storeys (13m-20m) and while TB2 would be perceived as almost a district scale tall building from this part of the neighbourhood, this would be ameliorated by the generally higher CH to the east.

To reinforce legibility one would expect that the place with the greatest significance (Euston Station Front / Entrance) would be marked with the tallest building. Such an approach would need to consider the relative importance of a location, but also the ability of a context to accommodate a building of such exceptional and contrasting height.

Recommendations

It is recommended for the EAP to:

- Review its approach to the location and heights of tall buildings in respect of comments made in the review;
- Ensure proposed heights are proportionate to the context height in their location and can successfully be assimilated by local character; and
- Review EAP's guidance for tall buildings proposed in the shadow of St. Paul's to clarify on how they should avoid impact on the silhouette of this landmark and how to demonstrate this through testing and criteria.

