

**Statement of Common Ground
between the London Borough of
Camden and Historic England
concerning the Euston Area Plan
Proposed Submission Draft**

October 2026

1. Introduction

- 1.1 This document is a Statement of Common Ground (SoCG) between the London Borough of Camden and Historic England, and concerns planning policies included in the Euston Area Plan (EAP) Proposed Submission Draft at the Regulation 19 stage.
- 1.2 It has been prepared to demonstrate that EAP Update, Proposed Submission Draft is 'based on effective joint working on cross boundary strategic matters' throughout the plan preparation period in accordance with Paragraph 36 of the National Planning Framework (NPPF) and will inform further engagement to ensure effective implementation of EAP Update policies.
- 1.3 It focusses on the matters raised by Historic England in their response to consultation on the EAP Update Proposed Submission Draft. It highlights matters where agreement has been reached between the Council and Historic England, and areas where agreement has not yet been reached.
- 1.4 In the spirit of collaboration, the document has been prepared as a 'live' document, which can be updated as matters progress and agreement is reached on outstanding issues. It therefore includes details on mechanisms for monitoring, reviewing and updating the Statement of Common Ground.
- 1.5 The EAP is being updated to ensure that the evidence base for key parts of the plan are revised to reflect the most up to date information, constraints, opportunities and priorities, including ensuring that the EAP is consistent with the updated Local Plan and the latest Government position on the construction of HS2 at Euston. Following informal consultation and engagement, proposed updates to the EAP were published for consultation January 2023. An additional consultation was held in Summer 2024. Regulation 19 consultation was held January - March 2026.
- 1.5 The Council is also in the process of updating the Local Plan. The Council published the Camden Local Plan Proposed Submission Draft for comment in May - June 2025. The draft Plan sets out the Council's vision for future development in Camden over the next 15 years and includes the planning policies and site allocations to help achieve this. The Camden Local Plan Proposed Submission Draft was submitted to the Secretary of State for independent examination on 3 October 2025, with examination hearings taking place in May and June 2026.
- 1.6 Historic England provided a response to the Euston Area Plan Update Proposed Submission Draft on 3 March and followed up with a more detailed letter on 6 March and to the Local Plan on 25 June 2025.

2. Strategic Geography

- 2.1 The parties to this SoCG are the London Borough of Camden and Historic England.

London Borough of Camden

- 2.2 Camden is a diverse inner London Borough with a population of approximately 215,000. Camden has a relatively young population, typical of a metropolitan city with a university presence, with a large proportion of students and younger adults and relatively few children and older people, compared to the national average. The southern portion forms part of the Central Activities Zone (CAZ) and includes Bloomsbury and Holborn, which neighbour the West End and City of London. Further north the character changes with many residential areas and neighbourhoods, including Camden Town, Hampstead, Highgate, Swiss Cottage, West Hampstead and Kentish Town, each with their own distinctive identity and characteristics. The character of the borough is also shaped by its topography and by significant parks and open spaces including Hampstead Heath and Primrose Hill.
- 2.3 London Borough of Camden is bordered by six other London boroughs: City of London, Westminster City Council, London Borough Brent, London Borough Barnet, London Borough Haringey and London Borough Islington.



Historic England

- 2.4 Historic England is the Government's statutory adviser on the historic environment, championing historic places and helping people to understand, value and care for them.

3. Key Strategic Matters

- 3.1 Many of the strategic matters and key issues to be addressed through compliance with the duty to co-operate are, in London, a matter for the London Plan or addressed through the preparation of the London Plan. The London Plan is part of the development plan for all planning authorities in London and Local Plans prepared by London boroughs are required to be in general conformity with it.
- 3.2 In London, planning and co-operation on strategic matters are generally covered by the London Plan, with more locally specific matters covered in local plans. Historic England are a key stakeholder on the London Plan and Camden and other boroughs also engage on the preparation of the Plan. The main strategic matter to be addressed through the Duty to Co-operate for the London Borough Camden and Historic England is tall buildings and their impact on heritage assets.
- 3.3 The Council has engaged with Historic England in an appropriate, proportionate and effective manner throughout the preparation of the Euston Area Plan Update, providing an opportunity for strategic matters to be discussed, and concerns in relation to the Plan to be addressed. Historic England are satisfied that the Duty to Co-operate has been met.
- 3.4 Given this, it is appropriate for this SoCG to focus on areas of agreement and disagreement between the London Borough of Camden and Historic England, in respect of the matters raised by Historic England in their response to the consultation on the Euston Area Plan Update Proposed Submission Draft.

4. Matters where the parties agree or disagree

Tall Buildings & Heritage Impacts

- 4.1 The Euston Area Plan Update identifies a number of potential sites for tall buildings. Policies in the EAP Update seek to encourage high-quality design and highlight that the acceptability of particular tall building proposals, and their location within sites, will be assessed against relevant Development Plan policies. They will be considered against relevant criteria, including consideration of the relationship between any proposed tall building and any impact on the historic environment. It also notes that any building which encroaches on the LVMF will be subject to consultation with the GLA.

4.2 While it is recognised that:

- the modelling is for capacity purposes and detailed design and layouts will need to be developed in accordance with development plan and London Plan policies
- on-site constraints have resulted in a reduction in developable area, and the challenge this presents in terms of meeting residential and commercial growth targets and facilitating viable development options in a sustainable location aligned to enhanced public transport infrastructure.

Historic England have raised concerns about the potential negative impact on the historic environment. This includes effects within the setting of the Grade I listed St Paul's Cathedral (also a strategic landmark within a number of LVMF views) as well as a number of other important heritage assets including Regents Park.

4.3 In response to the comments raised by Historic England, proposed modifications¹ to the EAP Update are set out in appendix A which seek to add clarity to the text with reference to the existing policy framework and add specific reference to heritage assets in relation to proposals for tall buildings. There are no outstanding issues.

4.4 A topic paper is being produced which sets out how the Council considered Heritage Assets in the development of the EAP update to support the Plan at examination.

5.1 Governance arrangements

5.1 This Statement has been prepared as a 'living' document, which will be reviewed and updated whenever agreement is reached on any outstanding matters; or at key stages in the plan-making process, as the Plan progresses through examination.

¹ These modifications fall within the scope of para.1.5 of the PINS Guidance and are not being submitted as part of the Submission Plan for examination. They are modifications which have been negotiated to address issues raised in response to the Regulation 19 consultation and which the Council is content to make subject to the Inspector concluding that they are necessary for soundness and should form Main Modifications to be consulted on in due course.

Signatures

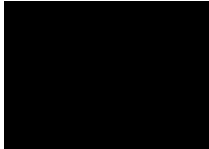
Both parties agree that this Statement is an accurate representation of matters discussed, and issues agreed upon.

LONDON BOROUGH OF CAMDEN

Name: Mary-Ann Lewis

Position: Director of Euston Regeneration

Signature:



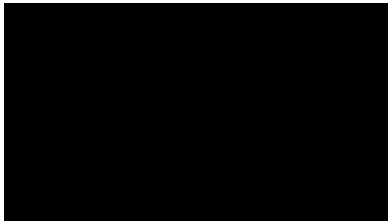
Date: 7th October 2026

HISTORIC ENGLAND

Name: Tim Brennan

Position: Historic Environment Planning Adviser

Signature



Date: 7 October 2026

The proposed modifications are set out below (suggested additions in **bold**, deletions as ~~striketrough~~).

These modifications fall within the scope of para.1.5 of the PINS Guidance and are not being submitted as part of the Submission Plan for examination. They are modifications which have been negotiated to address issues raised in response to the Regulation 19 consultation and which the Council is content to make subject to the Inspector concluding that they are necessary for soundness and should form Main Modifications to be consulted on in due course.

Doc Ref	Proposed modification	Reason
Strategic Principle EAP2 Design – D (pg. 68)	Adding specific reference to heritage assets in relation to proposals for tall buildings and reference to existing policy framework. <i>D: Tall buildings at Euston should be designed to respond to London Plan and Local Plan policies, being of both exceptional architectural quality and exemplary in terms of sustainable and low-carbon design in order to minimise their visual, and environmental and heritage impacts, demonstrating this through independent design review.</i> <i>E: The designated strategic viewing corridors will limit development heights in the Euston area. In accordance with the Camden Local Plan Submission Draft, tall buildings are defined as buildings which are over 40 metres in height in the Central Activities Zone and over 30 metres elsewhere. Locations appropriate for buildings above these thresholds are indicated in Figure 3.4, subject to design, heritage, policy and local view-considerations. Proposals should take account of, and avoid/ and or minimise harm to the significance of heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, and will be considered in accordance with National, London and Local Plan policies.</i>	Clarity - adding specific reference to heritage assets in relation to proposals for tall buildings and reference to existing policy framework.
Strategic Principle EAP2 Design – supporting text, (pg. 73)	General heights that may be appropriate for new development and potential locations for tall buildings are illustrated in figure 3.4. and are based on an analysis of the surrounding built context and modelling. The Generally heights shown would allow development that does not encroach into Protected Vistas (Landmark Viewing Corridor and Wider Setting Consultation Areas) identified in the London View Management Framework (LVMF) SPG. However, there may be impacts on local heritage assets, local views and context which would need to be addressed	Clarity - adding reference to existing policy framework and highlighting particular area of sensitivity.

	Development proposals should avoid and/or minimise harm to the significance of heritage assets and their settings in accordance with national, London Plan and Local Plan policies, this includes London Plan policy in relation to the LVMF. Development proposals, including those for tall buildings should not impact on the ability to recognise and appreciate relevant landmarks. Where there may be harmful impacts including on Protected Vistas, the significance of local heritage assets, local views and context, these will which would need to be appropriately addressed assessed and avoided and/or minimised (please see Appendix 3 of the EAP Background Report for further detail). Proposals resulting in harm to the historic environment will require clear and convincing justification and will be considered in accordance with National, London Plan and Local Plan. Exceptional quality design, including variation in heights and shaped massing to avoid coalescence of massing in the townscape should be developed to avoid and/or minimise any harmful impacts. However, there may be impacts on local heritage assets, local views and context which would need to be addressed (please see Appendix 3 of the EAP Background Report for further detail).	
Strategic Principle EAP2 Design – supporting text, (pg. 73)	Additional para proposed to be added to the end of pg. 73: The proximity of the EAP area to the Primrose Hill viewpoint 4A1 means that development in the Plan area, particularly in the indicative locations for taller buildings (Figure 3.4), should be carefully designed to avoid harm to St Paul’s and consideration should be given to the panorama as a whole. Development in the wider setting consultation area (and in the wider panorama) of Protected Vista 4A.1 will need to be carefully designed to avoid creating a canyon effect.	Clarity – adding reference to existing policy framework and highlighting particular area of sensitivity.
Strategic Principle EAP2 Design Building heights, massing and scale (pg.74)	A taller building to the north-east of the station (as shown in location B and site allocation EA2 in figure 3.4) would need to be less than 60 metres tall from approximate ground level (which equates to between 82 metres AOD and 84 metres AOD) will need to fully assess and avoid and / or minimise any harm to not	Responding to comments re View 24 Chester Terrace (from inner circle) with reference to existing policy framework

	affect the setting and significance of, and views within and of, nationally important heritage assets including the Grade I Regent's Park and Grade I Chester Terrace. Likewise, tall buildings in other areas identified in figure 3.4 (such as Regent's Park Estate and Maria Fidelis) would need to consider potential impacts on the setting of these heritage assets.	
EAP Site Allocation EA1 Euston Station and Tracks'(pg. 141)	Potential location of taller buildings Subject to design and testing, locations for taller buildings may be located in: • Location A (indicative heights 40-60m / 62-84m AOD) to the south-west of the station acting as a marker for the major infrastructure, within the shadow of St Paul's; or similar or lower in height of, the now demolished, 1 Euston Square. Proposed height to take account of and avoid and / or minimise any harm to the setting and significance of heritage assets including the Royal College of General Practitioners (Grade II*) and key views from Bloomsbury Conservation Area. • and in location B to the north-east of the station (indicative height 40-60m / 66-86m AOD) within the shadow of St Paul's Cathedral. Proposed height to take account of and avoid and / or minimise any harm to the setting of heritage assets including Regent's Park and Chester Terrace and mitigate the impact on neighbouring residential amenities. • Fuller guidance on heights for this site allocation is provided in the preceding section (Section 4.1) • Such development would need to be carefully sited to avoid harm and in line with London Plan policy, should seek to make a positive contribution to the strategic viewing corridors. Massing should be stepped back, have variation presenting breaks, avoid coalescence of massing in the townscape, and stitch the development within the context, especially where height needs to be mitigated to avoid harm to the immediate surrounding neighbourhood, strategic and local views and the setting and significance of heritage assets, including St Paul's Cathedral. • The acceptability of particular tall building proposals, and their location within the site, will be assessed against relevant Development Plan policies including Tall Building policy. Any building which encroaches on the LVMF will be subject to consultation with the GLA.	Clarity - adding reference to existing policy framework and inclusion of design guidance from earlier in the chapter in the site allocation for completeness.

	• Proposals resulting in harm will require clear and convincing justification, and will be considered in accordance with National, London and Local Plan policies. • Further guidance on tall building locations is provided in section 3.3 Design Strategy and in the preceding section (Section 4.1).	
EAP Site Allocation EA6 Park Village East (pg. 175)	Amendment to second bullet point of 'Potential location of taller buildings' • 'Tall buildings of around 12 storeys (up to approximately 42m / 73m AOD) may be appropriate in some locations. Potential taller building may be appropriate to the north, by the railway tracks. subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. The exact height of a future tall building would be subject to testing of impacts on strategic views in the London View Management Framework relevant local views and heritage assets. Exceptional quality design and shaped massing should be developed to minimise avoid and/or minimise any impact on the setting of the Conservation areas and listed buildings, including the grade I listed 2-11 Gloucester Terrace. Additional bullet to be added for consistency • Proposals resulting in harm will require clear and convincing justification, and will be considered in accordance with National, London and Local Plan policies.	Clarity - adding reference to existing policy framework and highlighting particular area of sensitivity
EAP Site Allocation EA9 Maria Fidelis (pg. 190)	Amendment to first bullet point of 'Proposed location of taller buildings' 'and relevant local views. <i>Particular attention should be given to any impacts on the setting of the grade II* St Katharine's Church in views from Regent's Park, with the design, height and massing of development proposals such that any adverse effects on significance are avoided and/or minimised.</i> Proposals resulting in harm will require clear and convincing justification, and will be considered in accordance with National, London and Local Plan policies.	Clarity - adding reference to existing policy framework and highlighting particular area of sensitivity

	<i>Development in the wider setting consultation area of Protected Vista 4A.1 ‘Primrose Hill: the summit – looking toward St Paul’s Cathedral’ (and in the wider panorama), should be carefully designed to avoid creating a canyoning effect and to not detract from the panorama as a whole.</i>	
EAP Site Allocation EA10 Regent’s Park Estate North (pg. 205)	Height of the proposed development should respond to the surrounding context with a potential general height of up to approx. 10 storeys. A taller building up to approximately 15 storeys may be appropriate subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. <i>Particular attention should be given to any impacts on the setting of the grade II* St Katharine’s Church in views from Regent’s Park, with the design, height and massing of development proposals such that any adverse effects on significance are avoided and/or minimised.</i> <i>Development in the wider setting consultation area of Protected Vista 4A.1 ‘Primrose Hill: the summit – looking toward St Paul’s Cathedral’ (and in the wider panorama), should be carefully designed to avoid creating a canyoning effect and to not detract from the panorama as a whole.</i> Proposals resulting in harm will require clear and convincing justification, and will be considered in accordance with National, London and Local Plan policies. The form and scale of a taller building should respect the amenity of neighbouring residents. The acceptability of particular tall building proposals, and their location within the site, will be assessed against relevant development plan policies. Any building which encroaches on the LVMF will be subject to consultation with the GLA. Further guidance on heights for this site allocation is provided in the preceding section (Section 4.5).	Clarity - adding reference to existing policy framework and highlighting particular area of sensitivity.

