Euston Area Plan Update

Proposed Submission Draft 2026

Consideration of Heritage Topic Paper

October 2026

Consideration of Heritage in the Euston Area Plan Update

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1. INTRODUCTION

1.1. The Euston Area Plan (EAP) (and subsequent update) is an area action plan, a development plan document that focuses on the Euston area, providing a framework for managing development and ensuring that it aligns with broader planning policies and community needs. The adopted EAP is, and the update once adopted will become part of, the Council's Development Plan.

1.2. The EAP is being updated to ensure that the evidence base for key parts of the plan is 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. The updated EAP will cover the period to 2051. 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.

1.3. 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. The examination is currently ongoing and hearings were held from May to June 2026, and a consultation on the proposed modifications to the plan is due to be carried out in Autumn 2026

1.4. The Paper details how the consideration of heritage assets accords with legislation, policy and guidance. While the Topic Paper focuses in on those issues raised by Historic England and other respondents, all heritage effects have been assessed in preparing the plan to the extent appropriate at the plan making stage.

1.5. This Topic Paper is one of a collection of Topic Papers to support Camden's Submission draft of the Euston Area Plan Update (Regulation 19).

2. STATUTORY AND POLICY FRAMEWORK

2.1. Section 66 of The Planning (Listed Buildings and Conservations Areas) Act 1990 sets out the general duty as respects listed buildings in exercise of a local authority's planning functions. In considering development which affects a listed building or its setting the local planning authority shall have special regard to the desirability of preserving a listed building or its setting or any features of architectural or historical interest which it possesses. Section 72 of the Planning (Listed Buildings and Conservation Areas Act) 1990 sets out the general duty as respects conservation

areas. In the exercise of a local authority's planning functions under the Planning Acts with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing its character or appearance.

2.2. Proposals for development in the Euston area, will be considered against the policies in the development plan.

2.3. Once adopted, the new Local Plan will replace both the current Camden Local Plan (2017) and those site allocations in the Camden Site Allocations Plan (2013) that do not fall within the Euston Area Plan boundary. The Euston Area Plan will replace the site allocation policies in the Camden Site Allocations Plan (2013) that fall within the Euston Area Plan boundary and the current Euston Area Plan (2015).

2.4. POLICY FRAMEWORK

National Policy and Guidance

2.5. Paragraph 203 of the NPPF states that: "Plans should set out a positive strategy for the conservation and enjoyment of the historic environment". This strategy should take into account:

- the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive contribution to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.

2.6. There is an expectation that planning authorities should deliver sustainable development by incorporating policies and issue planning decisions concerning the historic environment to:

- recognise that heritage assets are an irreplaceable resource;
- conserve heritage assets in a manner appropriate to their significance; and
- utilise opportunities to incorporate the historic environment in to place shaping

2.7. Paragraph 205 of the NPPF states that local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to assess the significance of heritage assets and the contribution they make to their environment.

2.8. Paragraph 208 of the NPPF states that local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to

avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

2.9. The NPPG at 18a-003-20190723 states that in developing a positive strategy for the conservation of the historic environment, "plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness".

2.10. Paragraph 003 goes on to set out that "The delivery of the strategy may require the development of specific policies, for example, in relation to use of buildings and design of new development and infrastructure. Plan-making bodies will need to consider the relationship and impact of other policies on the delivery of the strategy for conservation".

London Plan 2021

2.11. The EAP Background Report (proposed submission draft 2026) sets out the policy requirements of London Plan (LP) policies HC1 (part C), HC3 (Strategic and Local Views) and HC4 (London View Management Framework).

2.12. In addition, LP policy HC1 (Heritage conservation and growth) includes requirements for boroughs to develop evidence demonstrating a clear understanding of the historic environment in relation to Development Plans and strategies:

A. *Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.*

B. *Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:*
   1) *setting out a clear vision that recognises and embeds the role of heritage in place-making*
   2) *utilising the heritage significance of a site or area in the planning and design process*
   3) *integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*

4) *delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.*

2.13. The London Plan also includes other policies relevant to the EAP Update in relation to the identification of appropriate locations for tall buildings, the optimisation of site capacities for site allocations with details of acceptable building heights and massing. The policies are summarised in the Background Report (proposed submission draft 2026):

"*The London Plan sets out how development plans should approach planning for growth with an understanding of an area's character and qualities (Policy D1) and boroughs are expected to follow a design-led approach (set out in Policy D3 Optimising site capacity through the design-led approach) to establish optimised site capacities for site allocations. Boroughs are encouraged to set out acceptable building heights, scale, massing and indicative layouts for allocated sites, and, where appropriate, the amount of floorspace that should be provided for different land uses. Tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and making optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Based on local context, boroughs should define what is considered a tall building for specific localities and should determine if there are locations where tall buildings may be an appropriate form of development (London Plan Policy D9 Tall buildings).*"

Local Plan

2.14. The 'Proposed Submission Draft Camden Local Plan 2025' includes Policy D5 'Historic Environment' which seeks to conserve and enhance heritage assets and their settings and to ensure that the local historic environment is at the heart of place making. The submission draft is currently the subject of independent examination.

Other Guidance

2.15. A range of guidance is relevant to the consideration of the impacts of site allocations and taller buildings on heritage assets, including a range of Historic England guidance as set out below:

- The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3 (2015);
- Tall Buildings (Historic England 2022);
- The Setting of Heritage Assets (2017).

3. EVIDENCE BASE

3.1. Various supporting documents provide up-to-date evidence about the historic environment in the Euston area. In addition, relevant conservation area appraisals and management strategies together with the London View Management Framework

were taken into account when preparing the EAP Update. This included the testing and updating of the site capacity for the Euston Station masterplan area and previously identified sites, as well as additional sites identified through the call for sites. The evidence base is set out below.

- Euston Area Plan Historic Area Assessment, Allies and Morrison (2014)
- Background Report Appendix 2 Euston Area Action Plan: Historic Area Assessment: 2025 Update
- Euston Community-led heritage assessment (2019)
- Conservation Area Appraisal and Management Strategies: Regents Park (2011), King's Cross / St. Pancras (2003), Camden Town (2007), and Bloomsbury (2011)
- Camden's Local List (2015)
- London View Management Framework (2012)
- Camden Building Heights Study

3.2. The Background Report (proposed submission draft 2026) summarises the heritage context and notes changes to the heritage context since the EAP 2015. The Background Report also sets out key aspects from the relevant Conservation Area Appraisal and Management Strategies.

3.3. The Council considers that the evidence base prepared for the EAP Update is proportionate, relevant and up to date in line with the National Planning Policy Framework and provides a sound evidential basis for the Plan's proposals.

4. EAP'S STRATEGY FOR CONSERVATION OF THE HISTORIC ENVIRONMENT

4.1. The EAP Update highlights that the plan area includes parts of three conservation areas, over 50 listed buildings and features, and five designated London Squares (Key Issues, pg.30 of the EAP Update). It also highlights that the area is covered by several protected views in the Mayor's London View Management Framework (LVMF) which limits the scale of new development and which some of the current buildings in front of Euston Station intrude.

4.2. In accordance with the NPPF, the EAP Update avoids unnecessary duplication of policies set out in other parts of the Development Plan. This means that the design and heritage policies in the EAP Update need to be read alongside other policies in the Development Plan (the most relevant of which are set out below).

London Plan

- Design policies including D4 'Delivering good design', D8 'Public realm' and D9 'Tall buildings'
- Heritage and Culture policies including HC1 'Heritage conservation and growth', HC2 'World Heritage sites' and HC4 'London view management framework'

Camden Local Plan 2017

- Design and heritage policies D1 Design and D2 Heritage

Proposed Submission Draft Camden Local Plan 2025

- Design and heritage policies D1 Achieving design excellence, D2 Tall buildings, D5 Historic Environment
  (Historic England's response to the Proposed Submission Draft Camden Local Plan notes and very much welcomes the emphasis on high-quality design in new development)

4.3. The Design Strategy in the EAP Update includes overarching urban design, heritage and public realm policy. Strategic Principle EAP 2: Design sets out key design principles including:

- Responds in a manner that respects the scale and character of existing buildings, context and local views;
- Ensuring that development proposals take account of LVMF policy in relation to the designated Protected Vistas that cross the EAP area;
- Preserving or enhancing heritage assets and their settings that are sensitive to change;

4.4. Strategic Principle EAP 2 also sets out the EAP Update's policy in relation to strategic views and tall buildings. Strategic Principle EAP 2D highlights that tall building proposals should be developed in accordance with all relevant policies in the Development Plan and does not seek to repeat such policies. The relevant parts of the Strategic Principle are set out below and reflect proposed modifications[1] that have been agreed with Historic England following the Regulation 19 consultation. The additional proposed text has been highlighted in bold and the deleted text has been struck-through.

> **D:** Tall buildings at Euston should be designed in accordance with London Plan and Local Plan polices. This includes that they must be 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** impact**s**, demonstrating this through independent design review.
>
> **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**

[11] *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.*

considered in accordance with National, London and Local Plan policies.

4.5. The design principles and the policies in relation to both tall buildings and strategic and local views demonstrate a positive strategy for the conservation of the historic environment. Taken together with the strategic design and heritage policies of the London Plan and the Local Plan (when adopted) they provide a robust strategy for the conservation and enhancement of the historic environment.

4.6. The Euston Historic Area Assessment (HAA) (2014) identifies and describes 14 character areas, assesses their relative architectural and historic importance and provides an evidence base for retaining areas of distinctive character. The HAA also provides key recommendations for each character area (these are set out in the Background Report – submission draft).

4.7. The EAP 2015 took the character area approach forward with a simplified structure of seven character areas and specific policies and proposals for each area. The character areas were also referred to as 'Places'.

4.8. For each Place the existing context is summarised and then an overarching Development Principle to guide proposals in the area is set out. Informed by the evidence base, the EAP 2015 and the EAP Update highlight heritage assets in the context section for each Place. The EAP Update also refers to heritage assets in the relevant site allocations. The EAP Development Principles reflect the heritage context and sensitives of each of the character areas / places. The Development Principles set out below (in italics) demonstrate a positive strategy for the conservation of the historic environment.

4.9. *Development Principle EAP 2: Euston Road*

B: Elements of the historic design of Euston Square Gardens and its heritage assets will be restored, including moving the Stephenson Statue close to its original location. Opportunities to improve their setting through the provision of a redesigned bus facility will be encouraged to create a more welcoming, usable and attractive green space.

4.10. *Development Principle EAP 3: Camden Cutting*

Development proposals should be sensitive to the historic context and seek to preserve and enhance the setting of heritage assets through sensitive design and scale.

4.11. *Development Principle EAP 4: Drummond Street & Hampstead Road*

Development proposals in the Drummond Street and Hampstead Road area will protect and build upon the existing character of the area and heritage assets, and take opportunities to enhance connections, the public realm and building frontages where appropriate.

5. SITE SELECTION AND ASSESSMENT OF HERITAGE ASSETS

5.1. The following development sites were previously identified in the EAP 2015 which itself had cross referenced those sites first identified in the Camden Site Allocations 2013. The list below also identifies their Site Allocation identifier in the EAP Update (in **bold**).

- Euston Station and Tracks (**EA1**), the Royal Mail (**EA2**) and Ampthill Estate Railway Edge (**EA13**) were all included within a larger Euston Station and Tracks development site in the EAP 2015 rather than as separate site allocations;
- Cutting at Park Village East (**EA6**) and Granby Terrace bridge / Hampstead Road (**EA7**) were both part of the Cuttings development site in the EAP 2015;
- Former Maria Fidelis School (**EA9**) was identified as an opportunity site in the EAP 2015;
- Parts of Regents Park Estate North (**EA10)** were identified as a housing redevelopment site in the EAP 2015;
- Capital City College (**EA11**) was identified as site allocation 14 in the EAP 2015
- Surma Centre (**EA12**) was identified as a redevelopment opportunity in the EAP 2015

5.2. The following additional site allocations are identified in the EAP Update.

- The Place and Premier Inn (EA3)
- 250 Euston Road (EA4)
- Euston Square Hotel (EA5)
- Cutting at Mornington Terrace (EA8)

6. DESIGN LED CAPACITY ASSESSMENT

6.1. The capacity work to support the EAP update has followed a design-led approach, which has sought to optimise site capacity, in line with national policy and London Plan Policy D3 (Optimising Site Capacity through the design-led approach).

6.2. The first stage of the capacity assessment involved a thorough appraisal of the sites and their context including identification of relevant heritage assets. The main heritage assets that fall within each of the site allocations are set out in the context section of the relevant Places chapters (4.1– 4.7) of the EAP Update. Camden's conservation officers provided heritage advice setting out the significance of those heritage assets which had the potential to be affected by development of site allocations including any contribution to their setting from allocated sites. Consideration was given both to immediate impacts, where heritage assets were on or adjacent to sites, and to their setting (including their wider setting) through assessment of local and LVMF views.

6.3. A draft indicative block plan and height parameters were produced for each site allocation based on good design principles and site appraisal. The draft indicative block plan for site allocation EA1 'Euston Station and Tracks' was also based on officers' understanding of the emerging principles of HS2 and Network Rail station design and the land enabled for development. Developing a site layout and capacity for each site for testing was an iterative process which involved the use of SketchUp 3D modelling software to model the design parameters and select the options that best optimised both capacity and response to local context and character considered during the site-analysis stage.

6.4. The impacts on strategic and local views were assessed by placing the SketchUp models created for each site into VuCity, a highly accurate model of London, and assessing views from various viewpoints (full details of viewpoints are set out in Appendix 3 of the Background Report (proposed submission draft 2026). Modelling the height parameters and massing envelopes helped to refine height parameters and to determine the indicative site capacities for each site allocation. The process set out above is referred to as 'capacity modelling' in the Topic Paper and the SketchUp 3D model options that were selected for each site are collectively referred to as the capacity model. For many sites, the massing options tested show a range of building heights, demonstrating scope to redistribute capacity or reduce the height of taller elements without significantly affecting housing capacity. A lower and upper range for capacity was modelled by testing different massing envelopes. The capacity model outputs also informed viability testing.

6.5. The Conservation Officer's assessment of the nature and extent of any effects from development capacity massing envelopes on the significance of heritage assets informed the capacity work, resulting in modifications to the massing envelopes and informed the drafting of policies including site allocations.

6.6. In accordance with LP policy D9 'Tall Buildings', the design led capacity assessment identified potential locations for tall buildings and appropriate tall building heights. Following the approach taken in the draft new Camden Local Plan, tall buildings are defined as buildings that are over 40 metres in height in the Central Activities Zone (CAZ) and over 30 metres elsewhere in the borough. This definition was informed by the Camden Building Heights Study.

6.7. A range of factors, including the heritage context, were considered when identifying appropriate locations for tall buildings and the indicative heights for such tall buildings, in particular:

- Impact on the designated views, including protected vistas;
- Impact on the London Panoramas;
- Impact on local views, the setting of listed buildings and the character and appearance of conservation areas;
- Impact on local amenity, in particular sunlight and daylight, and outlook from neighbouring residential properties;

- The character, setting, context and the form and scale of neighbouring buildings; and
- Compliance with Tall Building policy in the London Plan (Policy D9).

6.8. As part of the design led capacity work, understanding the possible impact of potential future building heights on heritage assets and on the LVMF's London Panoramas and Protected Vistas was a key driver. London Panoramas and their protected vistas include the world heritage site of the Palace of Westminster and the Grade I listed St Paul's Cathedral as their focus. These buildings are cultural Strategically Important Landmarks. The process of determining potential locations for tall buildings and the indicative heights of such buildings sought to ensure that the ability to recognise and appreciate these Strategically Important Landmarks within the wider panorama would be preserved or enhanced in accordance with London Plan policy HC4 A.

6.9. The EAP area lies in the middle ground of strategic views from Primrose Hill to St. Paul's Cathedral and in the middle ground of two views from Parliament Hill to the Palace of Westminster. It also lies in the background assessment area of views from Greenwich Park and Blackheath Point to St. Paul's Cathedral. Full details of strategic viewing corridors and London Panoramas of relevance to the plan area are set out in Appendix 3 of the Background Report (proposed submission draft 2026).

6.10. These strategic views are all London panoramas, which under London Plan policy HC4 D should be managed so that development fits within the prevailing pattern of buildings and spaces, and does not detract from the panorama as a whole.

6.11. An assessment was also made of the potential impacts of the capacity model and taller buildings on local views. Appendix 3 of the Background Report (proposed submission draft 2026) sets out the status of these views and the methodology for identifying the local views, both of which are set out below.

6.12. "*Whilst the views assessed in this section are termed 'local views', it should be noted that such views can have wider importance, for example views from adjacent boroughs (i.e. views from Regent's Park which are within the boundary of the City of Westminster), or views that include nationally important listed buildings (such as the Grade I listed terraces facing onto Regent's Park), and impacts on how a historic designed landscape is experienced."*

6.13. "*The local views tested were identified through an assessment of the views identified in the conservation area statements and management strategies for Camden Town, Regent's Park, Bloomsbury and Fitzroy Square as well as the key access routes to the Euston Station site, which would provide unobstructed views to the site from main thoroughfares that would be subject to key viewpoints from the surrounding area."*

6.14. The local views tested were as follows:

- Views from a range of key access routes to the Euston Station site
- From Grade I Regent's Park towards Euston to the east

- Views north along Upper Woburn Place towards Grade I St Pancras Church and Eversholt Street
- Views from Grade II* Bedford Square to the north up Gower Street
- Views from Fitzroy Square to the north-east
- Views from the north end of Mornington Street and Park Village East towards the south
- Views from Oakley Square (locally listed), Mornington Crescent and Hampstead Road towards site allocation EA7 at the junction of Granby Terrace and Hampstead Road.

6.15. Strategic and local views of the capacity model were shared with the GLA, Historic England and neighbouring local authorities close to the EAP area (City of London, Westminster and Islington). Though an iterative process, the massing models were adapted and policy wording developed to reflect comments. A briefing was also held with the Dean and Chapter of St Paul's Cathedral as part of the regulation 19 consultation.

6.16. Historic England and the Dean and Chapter of St Paul's Cathedral have commented that the individual significance of designated heritage assets has not played a sufficient role in determining height ranges specified in the Plan. How the significance of heritage assets informed decisions on indicative building heights and the potential location and height of tall buildings and how this influenced policy wording is set out in sections 7 and 8 below. Appendix 1 of this topic paper identifies relevant heritage assets for each site allocation, provides details of the significance of these heritage assets and how the sites contribute to (or detract from) the significance of them. The potential level of harm to the significance of the asset was assessed, in accordance with step 3 of Historic England's HEAN 3 (2015). This level was assigned in relation to the harm that an asset might experience, but the descriptive assessment also identifies any neutral or beneficial changes where applicable. It then sets out potential mitigation and opportunities to enhance the significance and setting of these assets, and how this has been considered in the site allocation, noting that a full assessment will only be possible when there are detailed designs. This approach is in accordance with Historic England's Advice Note 'The Historic Environment and Site Allocations in Local Plans' and the Council considers that the approach taken is justified in supporting the policies in the EAP Update.

Potential harm to asset	Criteria
High	The significance of the heritage asset could be lost or substantially harmed.
Medium	The significance of the heritage asset could be harmed but not substantially.
Low	The significance of the heritage asset could be harmed but that harm would be minor.
None	The significance of the heritage asset will not be harmed.

Criteria for assessing potential harm from massing model

6.17. As detailed proposals for the sites are not available (site layout, building scale and massing etc.) and the assessment of heritage impacts is based on massing envelopes, the assessment cannot draw conclusive statements regarding the potential effects or definitive levels of harm. Detailed assessments would need to be undertaken as part of any subsequent planning applications. Therefore, where potential harm to heritage assets has been identified, this is indicative and there would be opportunities to mitigate this harm through the detailed design process, and policies in the EAP Update and wider development plan seek to minimise impacts on heritage assets.

7. POTENTIAL GENERAL BUILDING HEIGHTS

Basis for potential general building heights

7.1. Potential general building heights for site allocations are shown in Figure 3.4 of the EAP Update. Figure 3.4 also illustrates the Protected Vistas which criss-cross the EAP area. The potential general building heights were based on an analysis of the surrounding built context and modelling of impact on strategic views.

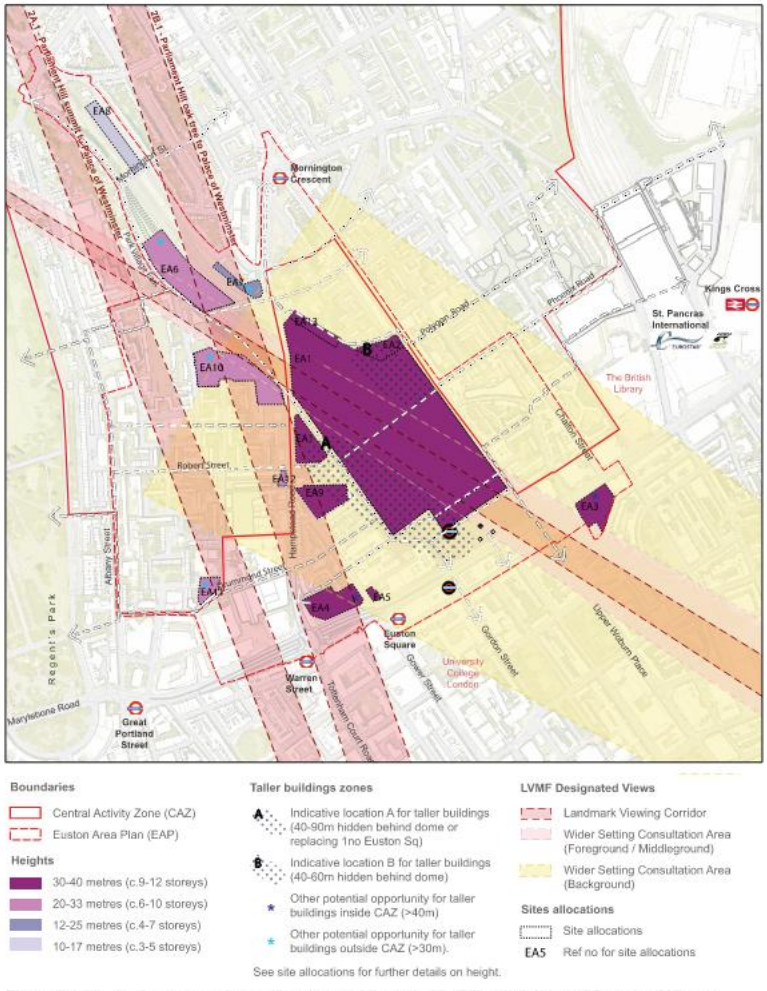


Figure 3.4 Illustrative masterplan to show potential general building heights and Protected Vistas; these are indicative only, and are assuming storey heights from an average ground level

Figure 1: reproduction of Figure 3.4 from EAP Update

7.2. The Background Report (proposed submission draft 2026) sets out how the general height range of 30-38 metres was identified for development in the backdrop of strategic views from Greenwich and Blackheath (5A.2 and 6A.1):

"*The indicative height of the proposed development (number of storeys) was initially based on the indicative heights in the EAP 2015. Additional height was modelled and tested against the threshold for height set by the viewing corridor restrictions protected through the Mayor's London View Management Framework (LVMF) and assessed in relation to the impact on local views and street views. VuCity provides a highly accurate model of London into which capacity models could be viewed allowing more accurate visualization and optimisation of height than was possible for the EAP 2015. This process demonstrated that the nominal LVMF height threshold of 30m could be fine-tuned giving a potential range of between 30 and 38 metres high from ground level without impact on protected viewing corridors. The impact of this additional height on local views and context was considered and adjustments made accordingly, in many cases highlighting sensitive relationships which will need to be considered when it comes to detailed design and planning applications.*"

7.3. As set out above, the capacity modelling process (see paragraphs 6.3 to 6.4) demonstrated that the nominal height threshold of 30m could be adjusted upwards and that building heights may go up to approximately 38m without extending over the existing built skyline or natural horizon ridge, preserving a viewer's ability to recognise and appreciate the important landmarks. The height threshold of 30m relates to the wider setting consultation areas of views 5A.2 and 6A.1. As the threshold height of the Primrose Hill viewing corridor 4A.1 is approximately 8m higher that these other viewing corridors, an increase of the threshold height to 38m was likewise found not to impact view 4A.1. The general heights threshold of 38m applies to site allocation EA1. Site allocations in other locations (e.g. EA3 and EA5) were found to be able to go up to 40m without affecting strategic views. Hence, the overall general heights range in Figure 3.4 is given as 30 to 40 metres.

7.4. Historic England (HE) requested clarification on the approach, highlighting that he Design Strategy states that "The general heights shown would allow development that does not encroach into Protected Vistas", but the capacity modelling "appears to show massing of a number of site allocations both within the wider setting consultation areas and in the viewing corridor".

7.5. A general height up to 38m on site allocation EA1 has been found to not impact on strategic views 4A.1, 5A.2 and 6A.1. However, the capacity model has tested massing which is higher than this, including both locations formally identified for tall buildings in the EAP Update as well as additional locations in site allocation EA1. This explains the encroachment HE has identified. This encroachment will be addressed in more detail in paragraphs 8.3 to 8.32 below.

7.6. To clarify this point, proposed modifications are suggested to the 'Building heights, massing and scale' section of the Design Strategy in the EAP Update (page 73) (as shown below). In discussion with HE, modifications are also proposed to strengthen references to NPPF, London and Local Plan policies, seeking to highlight the need to avoid/ and or minimise harm to the significance of heritage assets and their settings. Noting that proposals resulting in harm will require clear and convincing justification, and will be considered in accordance with National, London and Local Plan policies. The additional proposed text has been highlighted in bold and the deleted text has been struck-through.

> 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~~ **G**enera**lly** 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.~~
>
> **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.**

Potential general building height of EA1, EA2, EA3, EA4, EA5, EA9 and EA13

7.7. The general building heights range of 30-40 metres applies to the 'Euston Station and Tracks' site allocations (EA1 and EA2), 'Euston Road' site allocations (EA3, EA4 and EA5), Drummond Street and Hampstead Road site allocation (EA9) and Ampthill and Mornington Crescent Station site allocation (EA13). All these site allocations fall within the Wider Setting Consultation Areas of either View 5A.2 and 6A.1 identified in the LVMF. All these site allocations also fall within the Central Activities Zone where greater height would respond to the context of Euston Road and the significant potential for intensification and the opportunity to comprehensively transform Euston provided by HS2 and the redevelopment of the existing Euston Station.

7.8. More detailed site-specific guidance on general heights applicable to each site allocation's context is provided in each of the respective site allocations. This allows site allocations to indicate where heights should vary to respond to the surrounding context. For example, The Place and Premier Inn site allocation (EA3) includes the following:

"Height should respond to a varied context for this site: height may range from around 20m (42m AOD) above ground level to the south on Flaxman terrace (to better relate to the Bloomsbury Conservation area), to up to approx. 40m (62m AOD) to the north (responding to the higher context of Euston Road)."

7.9. As a principle, the EAP Update 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. It is also noted that any application for planning permission for development which would be above the development threshold plane for either the landmark viewing corridor or the wider setting consultation area, requires Camden to consult Historic England, the Mayor and relevant local planning authorities.

Regent's Park Estate North (EA10)

7.10. The potential general height range for Regents Park Estate North site allocation (EA10) is set as 20 to 33 metres (approx. 6-10 storeys). This is a broader height range than the EAP 2015, which set out a range of 21 to 24 metres (7 to 8 storeys). The area covered by site allocation EA10 also included Regent's Park Children's Centre and Stanhope Parade in addition to Carmel, Coniston and Langdale, the latter three sites having been previously identified in the EAP 2015. The change to the potential general building height range reflects updated capacity work and that some of the existing residential buildings already range in height from 7 to 9 storeys. The existing context to the north and south includes 9 storey residential buildings, so there is potential for an additional storey in this context.

Cutting at Park Village East (EA6)

7.11. The potential general height range for Park Village East site allocation (EA6) is set as 20 to 33 metres (approx. 6-10 storeys). The EAP 2015 had a more granular approach to height with 3 different height zones in this area, with height increasing towards Hampstead Road in the south. The potential general building heights in the EAP 2015 were 12 metres (up to 4 storeys) opposite Silsoe House, 50 Park Village East; 21 to 24 metres (7-8 storeys) opposite Richmond House; and 27 to 30 metres (9-10 storeys) to the north of Granby Terrace bridge and Cubitt Court, 100 Park Village East.

7.12. The supporting text to 'Development Principle EAP 3: Camden Cutting' in the EAP Update provides additional guidance on heights for this site allocation. It states that building heights should be generally circa 16m (5 storeys) adjacent to Park Village East and that development to the north side of Granby Terrace bridge may be up to around 9-10 storeys (c. 30-33 metres). The lower height of 16m recognises the lower surrounding context height to the north of Augustus Street. The increased height to

the south (30-33 metres) recognises the higher surrounding context near to Granby Terrace bridge (e.g. Cubitt Court, 100 Park Village East is 10 storeys).

Granby Terrace Bridge/Hampstead Road (EA7)

7.13. The potential general height range for Park Village East site allocation (EA6) is set as 12-25 metres (c.4-7 storeys) based on the assumption of 3.3m for a residential storey (rounded to a whole number of storeys). The adopted EAP 2015 had a narrower potential height range of 21-24 metres (7-8 storeys) based on the assumption of 3m for a residential storey. The range reflects the existing context height of 4 storey listed semi-detached houses and terrace houses on the south side of Mornington Crescent.

Cutting at Mornington Terrace (EA8)

7.14. The site allocation is a railway siding located adjacent to Camden Town Conservation Area and adjacent to Grade II listed buildings (58 Mornington Terrace (2 storey) and Edinboro Castle PH (3 storey)). The site is also opposite a 4 storey Grade II listed terrace (26-52, 53 and 54, 55 and 56 Mornington Terrace).

7.15. The potential general height range for the Cutting at Mornington Terrace site allocation (EA8) is set as 10-17 metres (c.3-5 storeys) based on the assumption of 3.3m for a residential storey (rounded to a whole number of storeys). The range reflects the existing context height.

7.16. The supporting text to chapter 4.3 'Camden Cutting' provides specific guidance for this site allocation. It states that "*development should be contextual to the historic grain of this part of the Camden Town Conservation Area and the nearby listed buildings. A development height of up to 5 storeys would respond to the existing context. This height is indicative and the precise height in this location should be the subject of a full testing process through detailed masterplanning work and an assessment of impact, site constraints and other factors including sunlight and daylight*".

Capital City College (EA11)

7.17. The site allocation is an existing education building of 5 storeys with a set-back 6th storey. Opposite the site on the eastern side of Stanhope Street is the locally listed '184 to 192 Drummond Street and 40 to 46 Stanhope Street' (5 storeys / c. 17m). Immediately to the north of the site allocation is Bucklebury Tower (a 19 storey residential tower), to the south west is Longford House, a part 6-storey, part 9-storey residential building and to the south is Regent's Place (a predominantly office development) with the 9 storey (45m) 1 Triton Square opposite the site.

7.18. The potential general height range for the Capital City College site allocation (EA11) is set as 20 to 33 metres (approx. 6-10 storeys) based on the assumption of 3.3m for a residential storey (rounded to a whole number of storeys). This range reflects the existing context height.

Surma Centre (EA12)

7.19. The site allocation is a 2 storey community centre on Hampstead Road. To the south of the site is the Grade II listed Prince of Wales public house which is part 4 storey and part single storey with the upper storeys set back from Hampstead Road. Opposite the site on the western side of Hampstead Road is the locally listed 108 Hampstead Road (the former St Pancras Charity School for girls). This is 3 storey with a raised ground floor (c.14m). To the north is a 7 storey residential block (Mardale) and to the west is the 6 storey Woodhall.

7.20. The potential general height range for the Surma Centre site allocation (EA12) is set as 20 to 33 metres (approx. 6-10 storeys) based on the assumption of 3.3m for a residential storey (rounded to a whole number of storeys). This range reflects the existing context height.

8. POTENTIAL LOCATION AND HEIGHT OF TALL BUILDINGS IN SITE ALLOCATIONS

EUSTON STATION AND TRACKS (EA1)

Identification of site as suitable for a taller building

8.1. Site allocation EA1 includes the following guidance on the potential location and height of tall buildings.

Potential location of taller buildings	• Height of up to 38m (61m AOD) over or adjacent to the station is assessed as not impacting on the LVMF viewing corridors and associated Wider Setting Consultation Areas.
	• 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 the setting 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 the setting of heritage assets including Regent's Park and Chester Terrace and mitigate the impact on neighbouring residential amenities.

8.2. This site allocation sets out two locations for tall buildings. These locations were originally identified in the EAP 2015. Location A is within the shadow of St Paul's (in the background Wider Setting Consultation Area of view 5A.2 'Greenwich Park General Wolfe statue to St Paul's Cathedral') and has been expanded since the EAP

2015 to take account of the opportunity for a replacement of the demolished 1 Euston Square, which previously would have appeared in this view. Such a replacement building has the potential to improve view 5A.2 which was previously impacted by this building's height and massing. As such, the site allocation identifies Location A as having the potential for a building similar or lower in height to 1 Euston Square. Location B is within the shadow of St Paul's in the background Wider Setting Consultation Area of view 6A.1 'Blackheath Point to St Paul's Cathedral'.



Figure 2: EAP Figure 3.4 (partial reproduction refocussed on site allocation EA1) showing potential general building heights (30-38m) and taller building zones A and B

8.3. Impact on Strategic Views

Impact on View 4A.1 Primrose Hill to St Paul's Cathedral

8.4. As well as these background wider setting consultation areas (of Greenwich Park and Blackheath Point to St. Paul's Cathedral), site allocation EA1 lies in the middle ground of the strategic view from Primrose Hill to St. Paul's Cathedral. Development above the threshold plane of this protected vista, which includes locations A and B in site allocation EA1, has the potential to impact this vista and the wider panorama.



Figure 3: Existing 2012 zoomed in view of Primrose Hill to St Paul's Cathedral showing threshold plane of landmark viewing corridor (red) and lateral wider setting consultation areas (yellow)

8.5. The London Views Management Framework 2012 (SPG) provides detailed guidance on the Protected Vistas. For the protected vista from assessment point 4A.1, the guidance makes the following observation: "*The cluster of tall buildings in the City of London is partially obscured by towers at Euston. St Paul's Cathedral is framed by two of these towers but a third, lower tower, reduces the viewer's appreciation of the dome and drum*."

8.6. The buildings at Euston referenced by the LVMF guidance are identified in Figure 4 (below). The towers framing St Paul's Cathedral are Evergreen House (180 Euston Road) and One Euston Square (demolished due to HS2). The 'third lower tower' (referred to above) can be identified as 1 Eversholt Street. The EAP Update continues to support comprehensive redevelopment of the area in front of the existing station. This would require the redevelopment of the station piazza, 1 Eversholt Street and the Podium, and former sites of 1 Euston Square and Grant Thornton House, to create new high quality buildings and new public spaces in front of the station entrances and entrances to the London Underground.

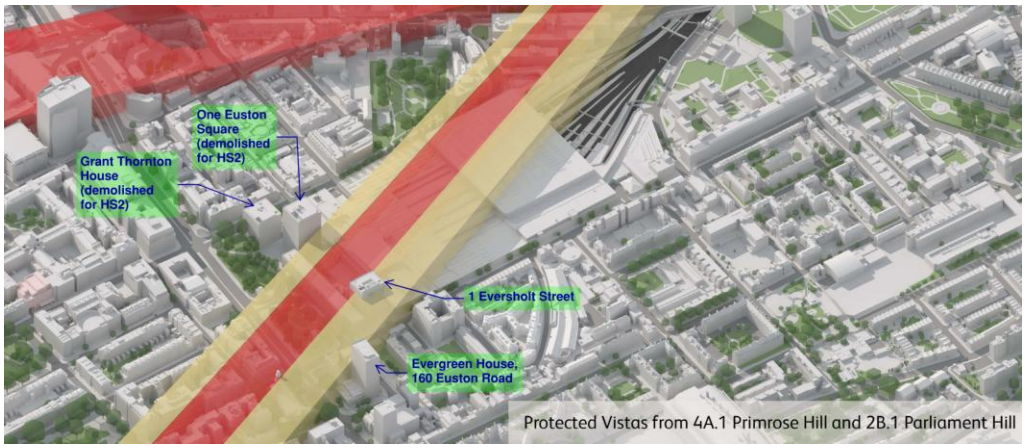


Figure 4: View 4A.1 Primrose Hill to St Paul's Cathedral and existing towers at Euston (some now demolished)

8.7. The LVMF views assessment in the Background Report (proposed submission draft 2026) demonstrates how comprehensive redevelopment at Euston including the demolition of 1 Eversholt Street could result in an improvement to Protected Vista 4A.1 (Primrose Hill to St Paul's Cathedral) as the ability to recognise and appreciate the peristyle, drum and dome of St Paul's could be enhanced. While the locations for tall buildings (A and B) are outside the wider consultation area for this view, it is nevertheless recognised that this particular view is sensitive to development because the foreground and much of the middle ground of the panorama is currently dominated by open space. Immediately beyond this are the existing towers of the Ampthill Estate and Euston. Given this context, future tall buildings in site allocation EA1 are likely to be prominent and have the potential to detract from this view. The massing of future development therefore needs to be carefully considered and guidance to this effect is proposed as a modification to the Design Strategy section of the EAP Update (see para. 8.18).

8.8. The view from Primrose Hill (Figure 5 below) helps to illustrate how existing tall buildings at Euston, and in the wider area, affect view 4A.1. Among the tall buildings identified in the view below, 40 Melton Street is identified. This was subsequently renamed as One Euston Square and has been demolished due to the construction of HS2. The less visible building, immediately to the left of 40 Melton St (One Euston square) and to the right of the western towers of St Paul's Cathedral, is Holborn Police Station, 10 Lambs Conduit Street.

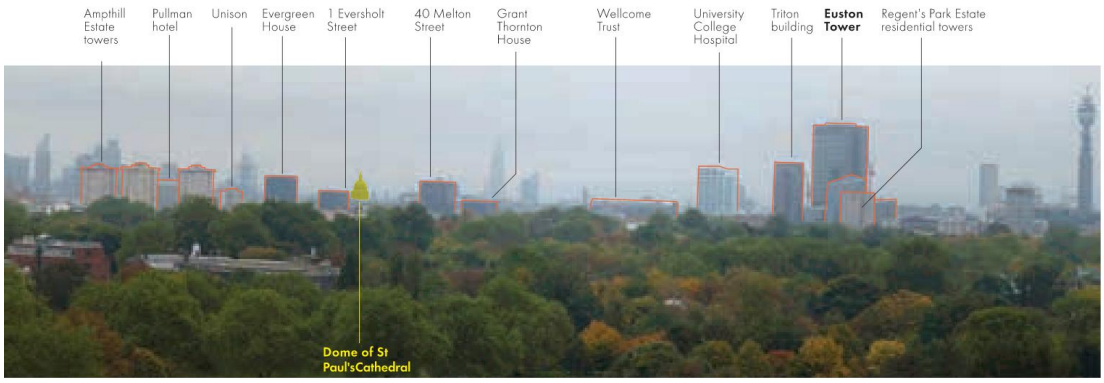


Figure 5: View from Primrose Hill (Euston Area Plan Historic Area Assessment (2014))

8.9. The use of VuCity for capacity modelling helped to highlight the potential for development at Euston to enhance the view of St Paul's from Primrose Hill (view 4A.1) and to align with the existing wider pattern of development (see Figure 6).

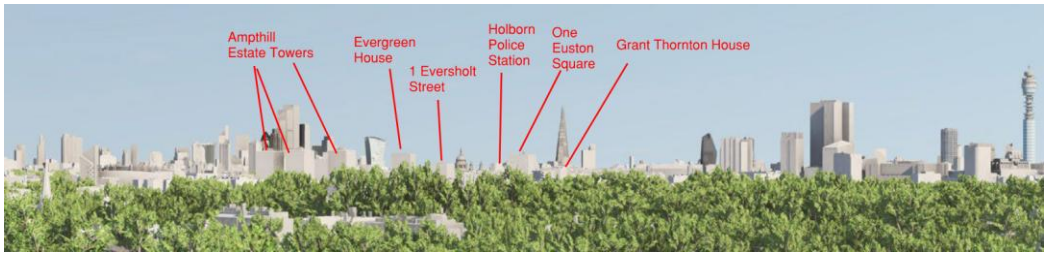


Figure 6: Existing Vu.City model showing Panorama 4A.1: Primrose Hill: the summit – looking toward St. Paul's Cathedral

8.10. In Site Allocation EA1 height was modelled both below and above the threshold plane of the lateral WSCAs of view 4A.1, providing a lower and upper range for capacity. For the upper range (see Figure 8 below), height and massing were modelled to step down towards St Paul's Cathedral from the height of Evergreen House without harming the overall composition of the panorama or the viewer's ability to recognise and appreciate this landmark. Likewise, in the wider setting consultation area (WSCA) on the other side of this viewing corridor, height and massing for the upper range were modelled stepping down from the height of the former One Euston Square. The modelled massing appears in front of existing development already visible in this area, such as Holborn Police Station, 10 Lambs Conduit Street. While the modelled massing goes above the threshold plane of the wider consultation area, this represents an improvement of the existing situation where 1 Eversholt Street reduces the viewer's appreciation of the dome and drum. The modelled massing above the threshold plane allows for height to step up either side of St Paul's Cathedral aligning with the existing wider pattern of development

with height appearing to increase with distance from the focal point of St Paul's. The progressive stepping of height also helps to avoid a canyon effect either side of the Protected Vista.



Figure 7: Vu.City model showing Panorama 4A.1 with lower range of capacity model



Figure 8: Vu.City model showing Panorama 4A.1 with upper range of capacity model

8.11. Historic England (HE) commented on the impact of the modelled massing of the capacity model on View 4A.1 Primrose Hill to St Paul's, noting that massing is modelled above the threshold plane of this view.

Cumulative VU.City model with tested Euston capacity model

The taller massing envelopes lies outside the Landmark Viewing Corridor and the Wider Setting Consultation Area. The taller cluster of buildings (in blue) to the left of St Paul's are part of the Canada Water Development in Southwark.

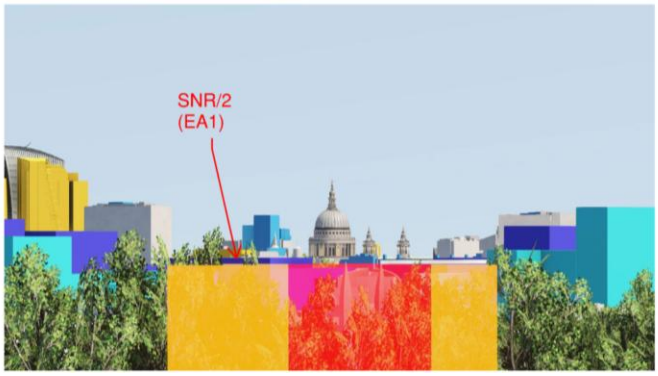
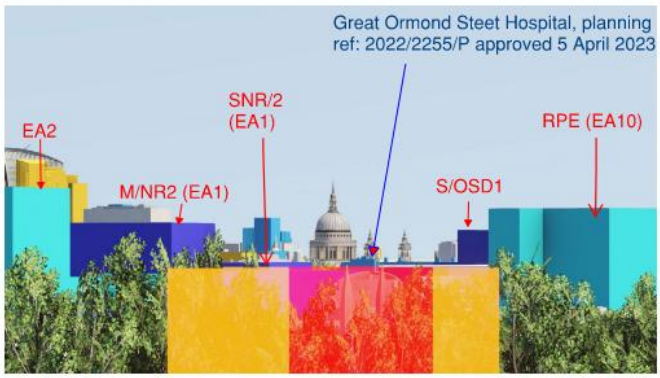


Figure 9: Cumulative Vu.City model - Zoom in of view 4A.1 Tested Massing Envelopes (lower range)



Cumulative VU.City model with tested Euston capacity model

The taller massing envelopes lies outside the Landmark Viewing Corridor. While there is some taller massing within the Wider Setting Consultation Area, this represents an improvement of the pre-existing situation where 1 Euston Square (now demolished) reduced the viewer's appreciation of the dome and drum (see existing 2015 photograph above). The taller cluster of buildings in blue to the left of St Paul's are part of Canada Water Development in Southwark.

Figure 10: Cumulative Vu.City model - Zoom in of view 4A.1 Tested Massing Envelopes (upper range)

8.12. Massing above the threshold plane of the Wider Setting Consultation Area of this protected view responds to London Plan policy HC4 which sets out clear expectations for how proposed development should respond to the various aspects of the LVMF. The London Plan states that "development in the foreground, middle ground or background of a view can exceed the threshold plane of a Wider Setting Consultation Area if it does not damage the viewer's ability to recognise and to appreciate the Strategically-Important Landmark" and that "development in the background of a Protected Vista that is inside or outside of the Wider Setting Consultation area should not harm the composition of the Protected Vistas".

8.13. HE's specific comments are as follows:

8.14. "*LVMF View 4A1 Primrose Hill to St Paul's: We note the protrusion of the proposed building line* [EA1] *above the LVMF threshold demonstrated in the modelling in relation to both the lower and upper ranges tested, including within the protected vista. Together with the taller buildings at either side (that would potentially create a closer 'canyonising' effect), we consider that this would be harmful and should be given further consideration.*"

8.15. Figure 3.4 of the Design Strategy and the site allocation set a guideline general height of 38m across site allocation EA1 and locations for tall buildings A and B both outside the wider setting consultation for view 4A.1.

8.16. As set out above, there is potential for height above the threshold plane of the lateral WSCAs without damaging the viewer's ability to recognise and appreciate St Paul's Cathedral and where progressive stepping of height helps to avoid a canyon effect either side of the Protected Vista. Notwithstanding HE's concerns, the upper range of the capacity model would enhance the viewer's ability to recognise and to appreciate St Paul's Cathedral due to the assumed demolition of 1 Eversholt Street.

8.17. It is also important to note that HE's comments relate to one potential arrangement of development plots. The capacity modelling does not reflect a proposed scheme and a future masterplan will need to respond to the developing designs for the HS2 and Network Rail stations and greater certainty on what land will be enabled for development. Policies in the EAP Update highlight the need for further modelling, testing and detailed design to develop an appropriate scheme and the policies in the Development Plan will ensure there will be appropriate consideration of heritage assets in the detailed design of the scheme.

8.18. Following discussion with HE, modifications are proposed to highlight the specific sensitivity more clearly in the 'Building heights, massing and scale' section of the Design Strategy in the EAP Update (page 73), highlighting existing London Plan and NPPF policy. The additional proposed text has been highlighted in bold.

> **The proximity of the EAP area to the Primrose Hill viewpoint 4A.1 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.**

Impact on View 5A.2 Greenwich to St Paul's Cathedral

8.19. Site allocation EA1 is in the background Wider Setting Consultation Area of view 5A.2 London Panorama Greenwich Park to Central London.

8.20. Figure 11 shows the pre-existing view 5A.2 with 'One Euston Square' (demolished as a result of HS2 works) highlighted. It is noted that while One Euston Square may impede the view of St Paul's Cathedral in view 5A.2, the London Views Management Framework 2012 description of the background view, does not explicitly refer to One Euston Square. The general description states that *"the background of St Paul's Cathedral in the view is mostly unimpeded, with a clear silhouette of the dome above the peristyle, and the western towers"*. The description of the view provides some guidance: "The ability to see sky between the upper parts of the various elements is crucial to the viewer being able to recognise and appreciate St Paul's Cathedral in this panorama". The Visual Management Guidance for the background of this view includes additional guidance: *"The dome (above the peristyle) and the upper parts of the western towers of St Paul's Cathedral are well defined against their background in this view. Development that exceeds the Wider Setting Consultation Area in the background of this view should preserve or enhance this level of definition".*

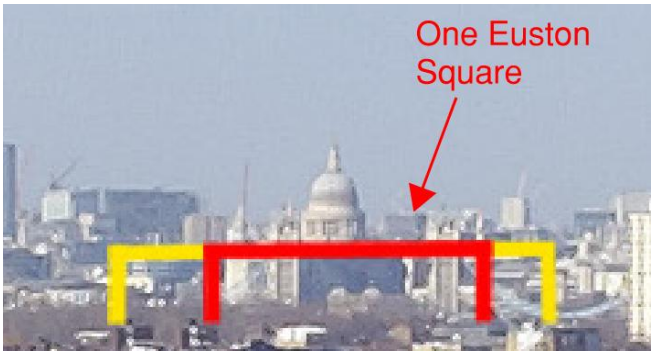


Figure 11: View 5A.2 as illustrated in London Views Management Framework 2012 (SPG) (enlarged)

8.21. In accordance with the approach taken for the EAP 2015, massing was modelled in the shadow of St Paul's. Following discussions with the GLA, massing was also modelled as a replacement of the demolished One Euston Square which previously would have appeared in the background of this view (see figure 11). The modelled massing is lower in height than One Euston Square and both the lower and upper range of the capacity model are considered to improve view 5A.2 which was previously impacted by this building's height and massing (see Figure 14 and 15). While the upper range slightly reduces the amount of sky around the peristyle, it does not go above this and it is important to again note the nature of the modelling, with the opportunity for a fully designed scheme to further refine this to ensure that the dome remains well defined against the background. It is noted that the assessment in appendix 1 (Euston Area Plan Site Allocations: Heritage Impact and Mitigation) identifies that there is potential for some harm to the significance of St Paul's Cathedral in the view from Greenwich (see appendix EA1 Euston Station and Tracks). It identifies harm rather than an improvement to the view because the pre-existing development (One Euston Square) was demolished in 2020 as part of the HS2 works and so is given less weight when assessing the heritage impact of massing modelled as a replacement. Nevertheless, there is scope at the detailed design stage to ensure an appropriate design led architectural response with stepping back massing and sympathetic materials which would minimise this impact.

8.22. The LVMF guidance states that "if existing buildings in a Landmark Viewing corridor are demolished, any replacement building should be designed so that no part of the building envelope … exceeds the threshold plane". However, this guidance is specific to development in a Landmark Viewing Corridor (the Landmark Viewing Corridor being the triangular area defining the foreground and middleground of a view) and no such advice is provided for WSCA. As previously highlighted, the London Plan states that development in the background of a view can exceed the threshold plane of the WSCA if it does not damage the viewer's ability to recognise and to appreciate the Strategically-Important Landmark. The lower and upper range of the capacity model help to demonstrate that a more fully developed scheme could meet this requirement and preserve the viewer's ability to recognise and appreciate St Paul's Cathedral.

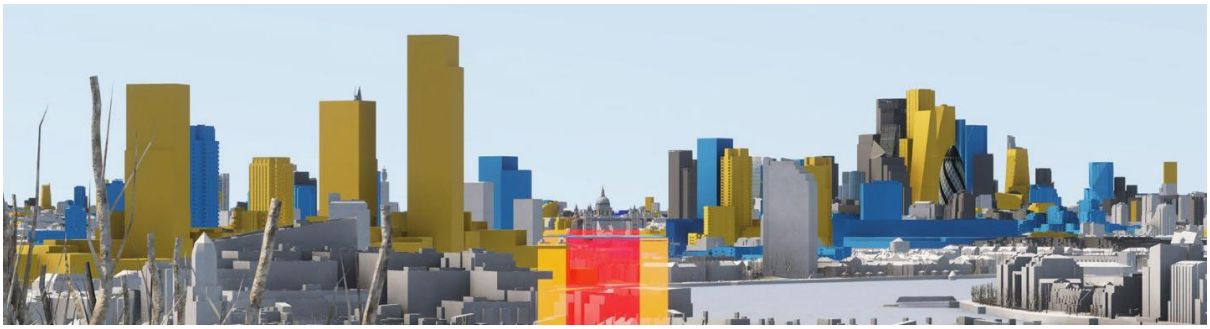


Figure 12: Vu.City 'cumulative' model showing Panorama 5A.2 with lower range of capacity model

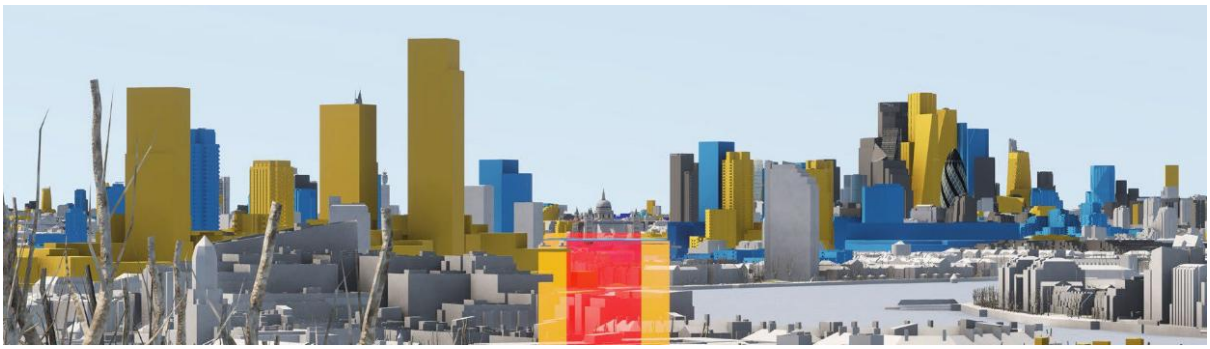


Figure 13: Vu.City 'cumulative' model showing Panorama 5A.2 with upper range of capacity model



8.23. HE commented on the impact of the modelled massing on this view.

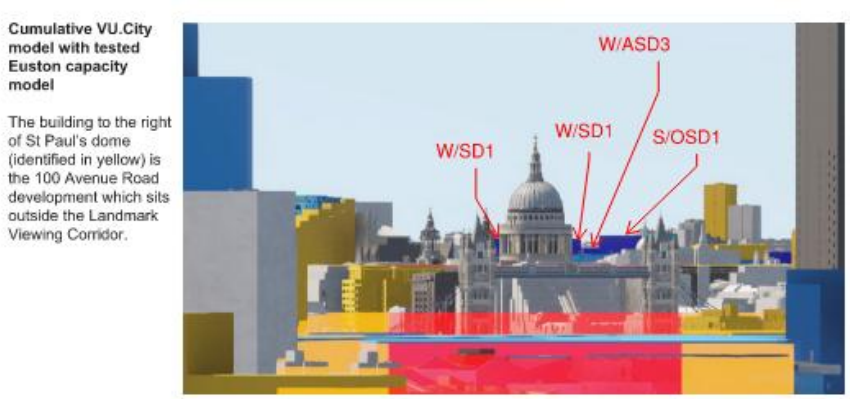


Figure 14: *Zoom in of view 5A.2 Tested Massing Envelopes (lower range)*

Cumulative VU.City model with tested Euston capacity model

The building to the right of St Paul's dome (identified in yellow) is the 100 Avenue Road development which sits outside the Landmark Viewing Corridor.

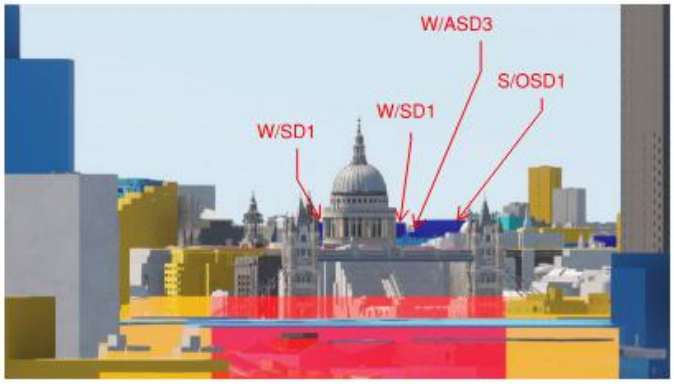


Figure 15: Zoom in of view 5A.2 Tested Massing Envelopes (upper range)

8.24. "*LVMF 5A2 Greenwich to St Paul's: While we note the harm created by 1 Euston Square has been removed by its demolition, we consider the opportunity for new development this creates should seek to reinforce the enhancements that have already been secured. The modelling demonstrates that development would wrap around behind the drum of the Cathedral, while the buildings to the right add further to the cumulative harm within the view. We consider that a different approach to development that redistributes the massing of new buildings in such a way that harm to significance is avoided is necessary here.*"

8.25. The potential harmful development identified by HE relates to the modelled massing envelopes of blocks W/SD1 and S/OSD1 in site allocation EA1. The indicative massing envelope for block W/SD1 was modelled to be within the shadow of St Paul's Cathedral and does not include any massing above the top of the peristyle. A scheme at detailed design stage has the opportunity to further refine this to ensure that the drum remains well defined against the background. The capacity model massing of S/OSD1 reflects discussions officers have had with the GLA in relation to the potential for a tall building at the south-west corner of the station as a replacement for the now demolished One Euston Square. This is an indicative capacity model and does not reflect what can be achieved with a designed scheme. The exact location and heights of buildings will be determined through a detailed design process which will be informed by the station(s) design and where land is enabled for development. Policies in the Development Plan will ensure that the detailed design responds appropriately.

8.26. To address the sensitivities identified by HE, a modification is proposed to the 'Protecting and enhancing strategic views and heritage assets:' section (4.1 Euston Station and Tracks) in the EAP Update (page 131) highlighting existing policy. The additional proposed text has been highlighted in bold.

> 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 or to **strategic and** local views **and the significance of heritage assets.**

8.27. In addition, modifications are proposed to site allocation EA1 'Euston Station and tracks' to respond to HE's comments, to highlight London Plan policy that development should seek to make a positive contribution to the characteristics and composition of Strategic Views and their landmark elements and, for completeness, to repeat the design guidance set out in the design sections of the EAP Update (as shown below).

Potential location of taller buildings	• Height of up to 38m (61m AOD) over or adjacent to the station is assessed as not impacting on the LVMF viewing corridors and associated Wider Setting Consultation Areas.
	• Subject to design and testing, locations for taller buildings may be located in:
	  o 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.
	  o 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.
	• **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.
	• **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 **more detailed guidance on heights is provided** in the preceding section (Section 4.1).

Impact on View 6A.1 Blackheath to St Paul's Cathedral

8.28. Site allocation EA1 also sits within the background Wider Setting Consultation Area of view 6A.1. London Panorama Blackheath Point to Central London.

8.29. The London Views Management Framework 2012 description of the background view states that *"the dome and western towers of the Cathedral are visible, the former silhouetted against the sky, enabling clear recognition and appreciation of the landmark. Few buildings are visible immediately behind the landmark, such that the rising line of hills to the north are the dominant backdrop feature"*.

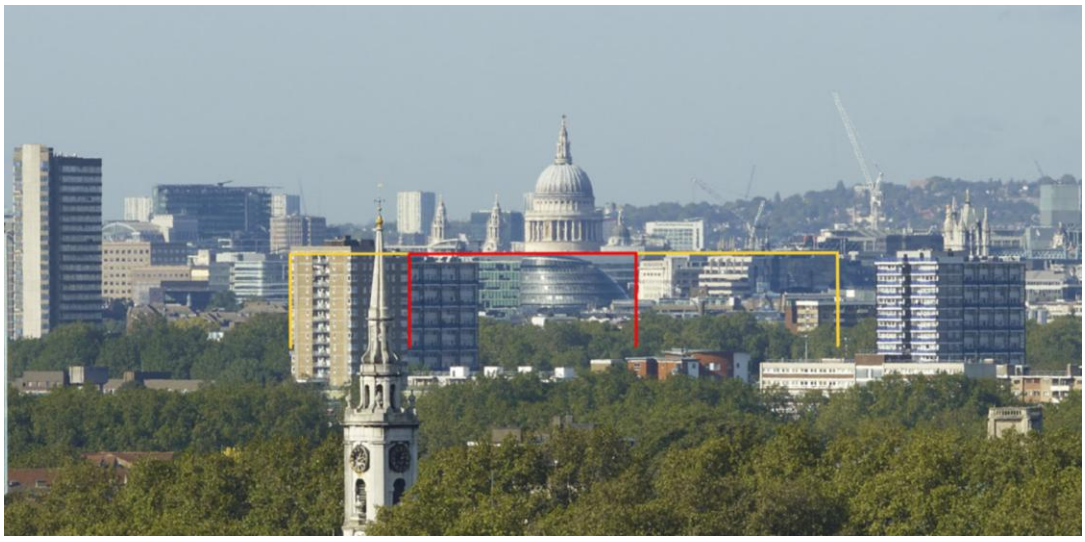


Figure 16: Telephoto view of Protected Vista from Assessment Point 6A.1 to St Paul's Cathedral as illustrated in London Views Management Framework 2012 (SPG)

8.30. The Visual Management Guidance for the background of this view includes the following guidance: *"Development in the Wider Setting Consultation Area should preserve or enhance the viewer's ability to recognise and appreciate St Paul's Cathedral and its western towers. It should generally not be taller than the base of the peristyle of the Cathedral although the effect of colour, scale, reflectivity and distance from the landmark of new development should be understood and tested"*.

8.31. In accordance with the approach taken for the EAP 2015, massing was modelled in the shadow of St Paul's. For the capacity model lower range, a very minimal amount of massing of site allocation EA1 was found to be visible, with the height of the massing marginally above the base of the peristyle (see Figure 17 below). In the upper range, while the massing envelopes of S/NR2 and M/NR2 are higher than the base of the peristyle and slightly more visible behind one of the western towers, the massing is nevertheless considered to allow for a detailed design which preserves

the viewer's ability to recognise and appreciate St Paul's Cathedral and its western towers (see figure 18 below).



Figure 17: Vu.City model showing Panorama 6A.1 with lower range of capacity model

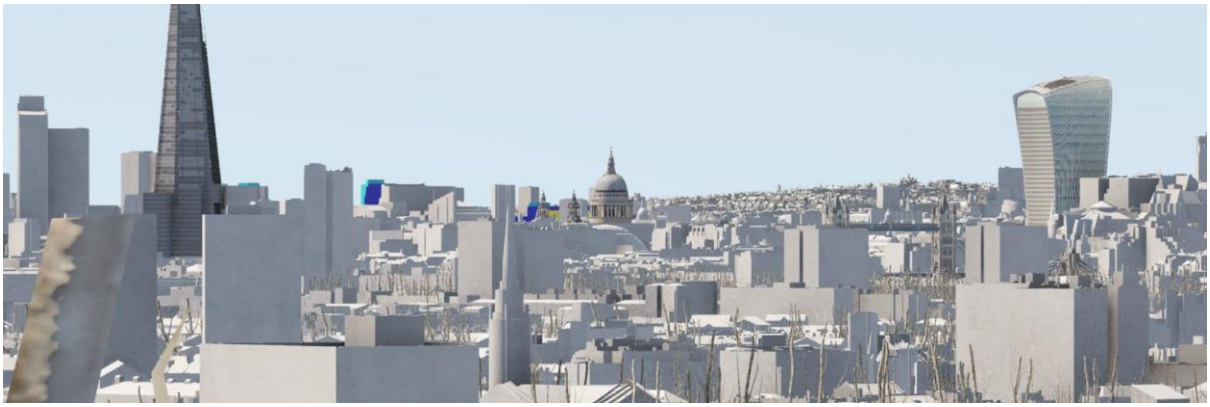


Figure 18: Vu.City model showing Panorama 6A.1 with upper range of capacity model

8.32. **Impact on heritage assets in local views**

8.33. An assessment has been made of the potential impacts of modelled massing and the indicative height and location of taller buildings, in site allocation EA1, on local views and the significance of heritage assets. The full local views assessment is set out in Appendix 3 of the Background Report (proposed submission draft 2026) and the full list of heritage assets is provided in appendix 1 of this topic paper with an assessment of potential impacts, mitigation and opportunities to enhance the significance and setting of these assets. The most significant potential impacts are discussed in more detail below.

Impact on views from Regent's Park: Chester Road towards Chester Terrace

8.34. Regent's Park is a Grade I Registered Park which is part of the Regent's Park Conservation Area. The conservation area covers part of John Nash's early 19th century Regent's Park development. The conservation area statement sets out key views in the conservation area which include views which emphasize the relationship of city to green space: 'Chester Terrace from Chester Road and from Chester Place' and 'From the Park to the Terraces seeing a clear roofline (without buildings in the background)'. Chester Terrace is a grade I listed terrace.



Figure 19: View 24 'Inner Circle junction with Chester Road' - Tested Massing Envelopes (lower range)

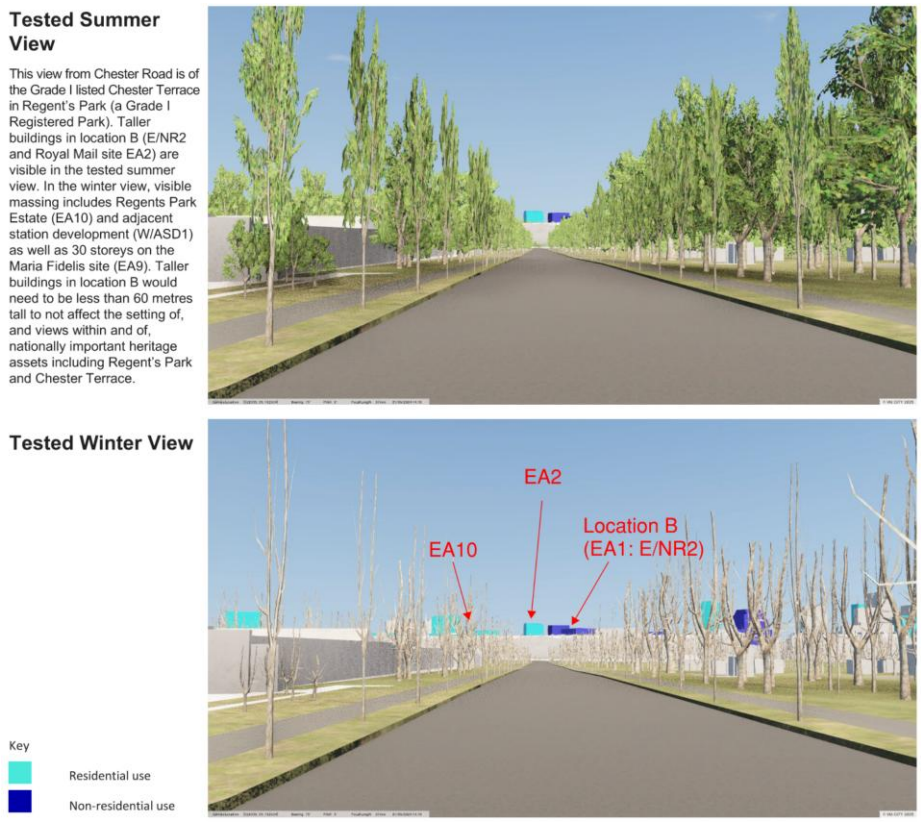


Figure 20: View 24 'Inner Circle junction with Chester Road' - Tested Massing Envelopes (upper range)

8.35. The local views assessment shows that taller buildings in location B to the north east of the station (site allocations EA1 and EA2) have the potential to impact the setting of Grade I Regent's Park and Grade I Chester Terrace from the Inner Circle/Chester Road view (local view 24). The capacity model massing has been developed in a range of heights and massing (lower and upper range) showing the possibility for minimising effects on the setting of Chester Terrace (see figures 19 and 20). In addition, the lower range massing has been developed so that any height that is visible is kept as low as possible and as far south as possible so as to result in a massing that is off-centred from the view, and partially hidden, nestled into the tree canopies.

8.36. The EAP Update retains wording from the EAP 2015, stating that '*A taller building to the north-east of the station (as shown in location B 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) to not affect the setting of, and views within and of, nationally important heritage assets including Regent's Park and Chester Terrace'* The EAP 2015 recognised that there are limited locations for tall buildings at Euston due to the LVMF strategic views which cross the area. As such location B, in the shadow of St Paul's Cathedral, represents an important location where there is potential for height and this approach was tested at examination and found to be sound and justified. The EAP Update continues with this approach and continues to promote tall buildings in this location which was reflected in the modelling.

8.37. It is also noted that Brill Tower is already visible above Chester Terrace and is a prominent feature in this view, providing a modern context. In developing massing options, it was considered that additional buildings visible above the terrace will result in a degree of harm but would not undermine the composition or the grandeur of the terrace.

8.38. HE have highlighted the impact of the EAP Update capacity model on the views of the Grade I listed Chester Terrace from Regent's Park (local views 23 and 24) and raised a concern that the EAP text setting out indicative height for development in location B of the EAP Update would not protect the setting of this heritage asset. Location B relates to both site allocation EA1 and EA2 (Royal Mail). While HE mentions views 23 and 24, their second letter (dated 6th March 2026), appears to clarify that the concern is with view 24 from the Inner Circle junction with Chester Road. This second letter contains the following:

8.39. "*While this demonstrates that proposed building heights would not be visible from the junction of Chester Road and the Broad Walk towards the Plan area (view 23), it also shows buildings above the roof line of the terrace from the junction of the Inner Circle and Chester Road.*"

8.40. HE suggested that the wording taken forward from the EAP 2015 is not appropriate given that capacity modelling shows massing envelopes above the roof line of the Grade I listed Chester terrace when viewed from the junction of the Inner Circle and Chester Road, despite site allocation EA1 being less than 60m in height in the lower

range. HE's full comments on the lower and upper range of the capacity model (view 24), are set out below.

8.41. "*As such, the retained text that indicates 'A taller building to the north-east of the station (as shown in location B 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) to not affect the setting of, and views within and of, nationally important heritage assets including Regent's Park and Chester Terrace' is problematic. The modelling appears to demonstrate both that buildings below 60m would create effects, and that the upper range massing for relevant site allocations would also appear above the roofline.*

Chester Terrace is listed at grade I. Designed by Decimus Burton and completed in 1825, the terrace terminates the designed axial view along Chester Road from the Inner Circle (the focal point of Regent's Park). It also forms part of John Burton's vision for the remodelling of a substantial part of central London. The proposed heights of the tall buildings in question would in our opinion affect the setting and significance of the Terrace, and would further disrupt a view that was designed to show a row of buildings of coherent architectural unity.

The existing tall building at Brill Place clearly harms this view. We consider that proposed buildings at location B and site allocation EA10 would create cumulative harm to the setting and significance of the Terrace if developed at the modelled lower capacity range. If buildings were to come forward at the upper range, they would obscure the Brill Place tower and present taller and more intrusive effects on the view. This would represent a greater level of harm.

As a result, we consider that the related text on conserving the significance of the affected assets where tall buildings proposals come forward in these locations needs to be revised to ensure it will achieve its objective."

8.42. Officers considered that the impact of new buildings in this location is lessened (see figure 19) with the completion of Brill Tower. There is no longer a clear roofline above Chester Terrace, and Brill Tower provides a modern context. Notwithstanding this, the range of heights contained in the policy allows for the appropriate height of a development to be determined through the development management process in the context of detailed designs. It is difficult to say in the absence of detailed proposals what the appropriate height is, with the final decision turning on a balance of considerations. Reflecting this, the detailed height guidance for location B provides a range of heights (indicative height 40-60m / 66-86m AOD) and expressly states that the proposed height would need to take account of the setting of heritage assets including Regent's Park and Chester Terrace.

8.43. Following discussion with HE and to address the specific issue identified (i.e. that buildings below 60m would create effects), a modification is proposed to the 'Building heights, massing and scale' section of the Design Strategy in the EAP Update (page

74) which seeks to clarify this issue and highlight wording in the NPPF, London and Local Plans.

> 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 60m tall from approximate ground level (which equates to between 82 metres AOD and 84 metres AOD) to~~ ~~not affect~~ **will need to fully assess and avoid and/or minimise any harm to** 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.

8.44. In addition, following discussion with HE, modifications are proposed to parts D and E of 'Strategic Principle EAP 2: Design' to refer to the wider policy framework.

> **D:** Tall buildings at Euston should be designed in accordance with London Plan and Local Plan polices. This includes that they must be 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** impact**s**, demonstrating this through independent design review.
>
> **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.**

Impact on views from Regent's Park: The Broad Walk towards St. Katharine's Danish Church

8.45. As previously set out, Regent's Park is a Grade I Registered Park which is part of the Regent's Park Conservation Area. St. Katharine's Danish Church is a Grade II* listed church and the view 'towards St Katharine's, the Danish Church, with its spires and precinct' is identified as one of the key views in the Regent's Park Conservation Area appraisal.

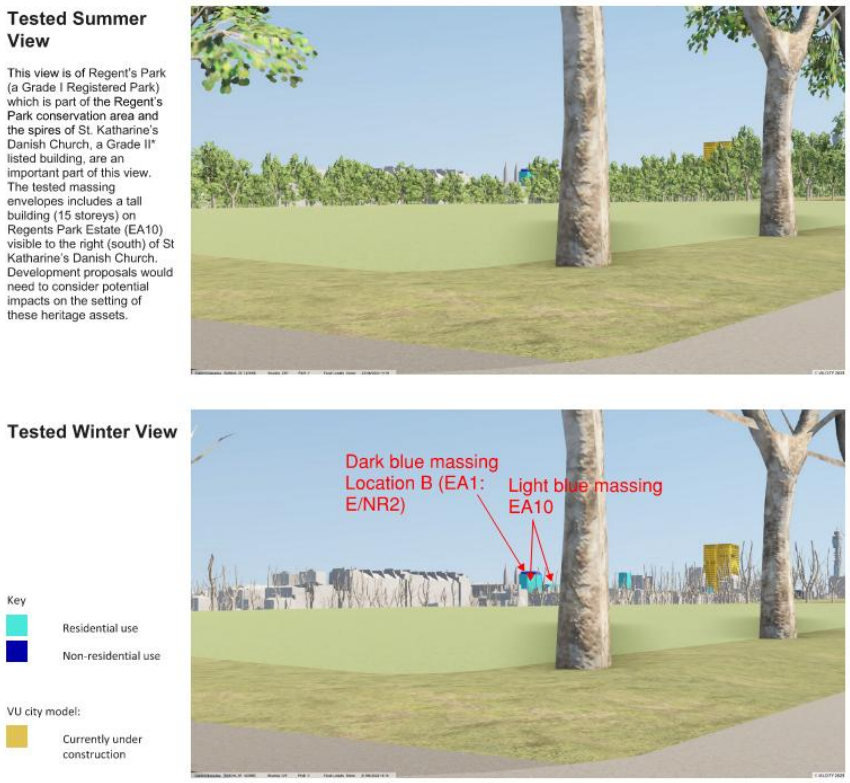


Figure 21: View 20 'Regents Park – The Broad Walk (north) looking south east' - Tested Massing Envelopes (lower range)

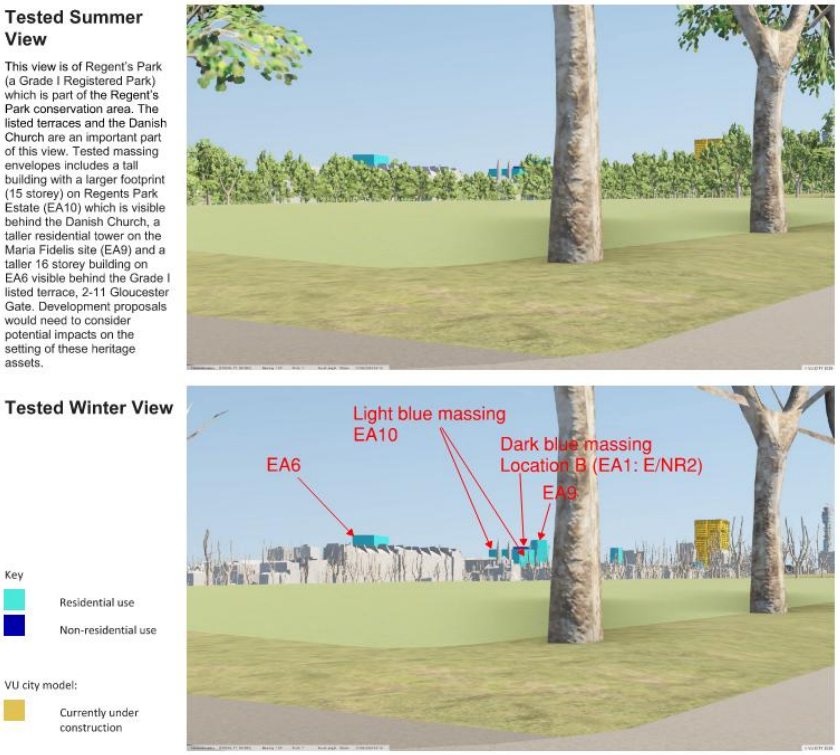


Figure 22: View 20 'Regents Park – The Broad Walk (north) looking south east' - Tested Massing Envelopes (upper range)

8.46. The local views assessment shows that taller buildings both in location B in this site allocation (EA1) and in site allocation EA9 (Maria Fidelis) and EA10 (Regent's Park

Estate North) have the potential to impact the setting of the Grade II* St Katharine's Church in this view from the Broad Walk (view 20). There would also be an impact on the setting of both the Regent's Park conservation area and the Grade I Regent's Park. The modelled massing envelope of a tall building in location B of site allocation EA1 is largely hidden behind the massing of EA10. It is important to note that more recent photography demonstrates that tree cover, even in winter, would limit the visibility of future development to the south-east of the church (i.e. development to the right of the spires in Figure 21 and 22).

8.47. The massing has been developed in a range of massing and heights (upper and lower range) showing the possibility for minimising effects on the heritage asset. The lower range massing has been adjusted to sit behind existing foliage and to avoid appearing directly behind the Grade II* listed Danish Church spires. Nevertheless, it is noted that the tested height of the massing for both EA1 (Euston Station and Tracks) and EA10 (Regents Park Estate North) in the lower range could distract from the prominence of the listed church and spires in this particular view.

8.48. The capacity massing is indicative and future development proposals will require a more detailed design process resulting in an appropriate design led architectural response, including a refined massing composition which will need to take into account the significance of this listed church, and the setting of the Regent's Park conservation area and the Grade I registered park. Further views testing will be required for future development proposals to identify whether there are further viewpoint locations (in addition to view 20) that should be considered to understand the extent of any impacts on the view towards St Katharine's, the Danish Church.

8.49. Modifications are proposed to relevant site allocations to highlight that 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 mitigated.

8.50. While there is an identified heritage impact from both the lower and upper range, the capacity testing of site allocation EA1 is considered to provide a sound justification for the indicative height range of location B (indicative height 40-60m / 66-86m AOD). The assessment of harm is based on massing envelopes rather than detailed proposals and there will be scope to redistribute the massing to minimise impacts. In addition, the lower range tested of the capacity model has a height in location B of 56.7m (77.9m AOD) which is actually towards the top end of the indicative height range. This helps to demonstrate that height towards the lower end of the height range would be likely to have less impact on these heritage assets if located appropriately. In accordance with Development Plan policy, future development proposals would be expected to avoid harm to heritage assets and their settings with proposals resulting in harm requiring clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh such harm.

ROYAL MAIL (EA2)

Existing context

8.51. The site is located in the CAZ and within the WSCA (background) of view 6A.1 Blackheath Point to St Paul's Cathedral as set out in the London View Management Framework SPG. The terrace to the north (Eversholt House, 163-203 Eversholt Street) is Grade II listed as is the Church of St Mary the Virgin, diagonally opposite the site.

Identification of site as suitable for a taller building

8.52. This site was identified as a potential location for tall buildings, in the shadow of St Paul's Cathedral, by the adopted EAP 2015 (Figure 3.4). While this site is now identified as a separate site allocation, it continues to be identified as a potential location for tall buildings and is identified as 'location B' in Figure 3.4 of the EAP Update. The EAP 2015 identified that a tall building on this site had the potential to affect the setting of, and views within and of, nationally important heritage assets of Grade I Regent's Park and Grade I Chester Terrace.

Impact on views from Regent's Park, Chester Road towards Chester Terrace

8.53. The local views assessment shows that taller buildings in this site allocation have the potential to impact the setting of Grade I Regent's Park and Grade I Chester Terrace from the Inner Circle/Chester Road view (local view 24 – Figures 19 and 20 above). The massing has been developed in a range of heights and massing (upper and lower range) showing the possibility for minimising effects on the heritage assets. The minimum option shows how the development of different typologies (i.e. low deep massing) minimises effects (see figure 19 above).

8.54. View 24 of the local views assessment and other views of Chester Terrace terminating the view along Chester Road contribute to the special interest of both the park and the terrace by revealing a planned axis that Nash intended to lend grandeur to his development. The view frames the centre of the Terrace quite tightly however, and even in winter the roofs of no more than 5 of its 42-house long horizontal roofline are visible between trees (as shown in Figure 23 below).



Figure 23: View from Inner Circle/Chester Road towards Chester Terrace with 100mm and 200mm lens (3rd April 2026)

8.55. At this distance and without views of the wider Terrace, the detail, totality and special length of Nash and Burton's architecture is not easily appreciated. Chester Road itself is lined with cars and road markings. Other views of Chester Terrace also reveal aspects of its special interest. Views to the east from the Broad Walk are particularly significant; indeed, they better reveal the length and horizontality of Chester Terrace than do longer views along Chester Road from the Inner Circle, and they better set the Terrace in its intended parkland context than do views of it beyond a car-lined road. The massing of both this site allocation and location B of site allocation EA1 would not be visible at all in views from the junction of the Broad Walk and Chester Road (see Figures 24 and 25 below).



Figure 24: View 23 'Chester Road / The Broad Walk junction looking east' - Tested Massing Envelopes (lower range)



Figure 25: View 23 'Chester Road / The Broad Walk junction looking east' - Tested Massing Envelopes (lower range)

Soundness of site allocation

8.56. The capacity testing of site allocation EA2 is considered to provide a sound justification for the indicative height range of location B (40-60m). Height above 40m is defined as a tall building in the CAZ. Height below 60m would be screened in the background of view 6A.1 by the dome of St Paul's Cathedral. The local views testing demonstrates that development at the lower end of the range would minimise impact on Chester Terrace.

Reg 19 consultation

8.57. Following discussion with HE and in order to ensure consistency across the plan, modifications are proposed to this site allocation which reflect the modifications proposed to site allocation EA1 (see para. 8.41 above).

Potential location of taller buildings	• Subject to detailed design and testing, there may be opportunity for a taller building **(indicative height 40-60m / 66-86m AOD)** to be located on this site. ~~The building would need to be less than 60 metres tall from approximate ground level (which equates to between 82 metres AOD and 84 metres AOD) to not affect the setting of, and views within and of, nationally important heritage assets including Regent's Park and Chester Terrace~~. **Proposed height to take account of and avoid and / or mitigate any harm to the setting of heritage assets including Regent's Park and Chester Terrace.** • The height of a tall building should not cause unacceptable impact to the amenity of neighbouring occupiers, in particular the residents of the Ampthill Square Estate situated to the north of the site.

	• 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. • Development must be designed to respect the nearby listed buildings.

THE PLACE AND PREMIER INN (EA3)

Existing context

8.58. Part of this site is located within the lateral WSCA of Protected Vista 4A.1 'Primrose Hill to St Pauls Cathedral' and the whole of the site falls within the background WSCA of Protected Vista 6A.1 'Blackheath Point to St Paul's Cathedral' as set out in the London View Management Framework SPG. The strategic views assessment in the Background Report (proposed submission draft 2026) has not identified any impact from the modelled massing on these views (with a height of 10 storeys tested to north of the site).

8.59. The south of this site is also located within the Bloomsbury Conservation Area. Part of the site, 17 Duke's Road and attached railings, is Grade II listed. Opposite the site on Duke's Road is the Grade I listed Church of St Pancras and opposite the site on Flaxman Terrace is the Grade II listed Flaxman Lodge. The existing mixed-use building (hotel and residential), which occupies the front (northern) part of the site facing Euston Road with a return wing on Duke's Road, is part 6 storey and part 10 storey.

Identification of site as suitable for a taller building

8.60. The site falls within the Euston Road sub-area. The prevailing character of Euston Road is one of large commercial and institutional buildings. It is punctuated by a number of tall buildings including the Euston Tower, One Euston Square (now demolished as part of HS2 works), Evergreen House (160 Euston Road) and University College Hospital. Around the site allocation there are a number of existing tall buildings: Pullman Hotel,100-110 Euston Road (16 storeys); Unison, 130 Euston Road (10 storey), The Halo Building,1 Mabledon Place (11 storeys). In this context, a redevelopment of the front of the site with a taller building would be an appropriate response to the surrounding context.

8.61. On Flaxman Terrace to the rear of the site allocation, Flaxman Court is 6 storeys (including a floor of accommodation at roof level) and Flaxman Lodge is 2 storeys (with raised ground floor). In this context, a redevelopment of the site with a building that responds to this lower context would be appropriate.

8.62. Site allocation EA3 states that the height should respond to the varied context of this site. It provides an indicative height of 40m (62m AOD) to respond to the higher context of Euston Road while highlighting that taller buildings may be appropriate on Euston Road subject to testing the impact on the LVMF background view and impact on local context. Recognising the lower context on Flaxman Terrace and the Bloomsbury Conservation Area to the south of the site allocation, the site allocation

provides an indicative height of around 20m (42m AOD) above ground level for this part of the site.

8.63. It is noted that the Grade I listed Church of St Pancras and the Grade II listed 17 Duke's Road (a former drill hall) are already adjacent to the taller element (10 storey) of the Premier Inn / Somerton House part of the site. The contrast in height with these nearby listed buildings has therefore been established. Nevertheless, it is important that the redevelopment of this site allocation protects the setting of these listed buildings.

EUSTON CIRCUS BUILDING, 250 EUSTON ROAD (EA4)

Existing context

8.64. The eastern edge of this site is located with the background Wider Setting Consultation Area of Protected Vista 5A.1 'Greenwich Park Wolfe statue to St Paul's Cathedral' and the remainder of the site falls within Landmark Viewing Corridor 2B.1 'Parliament Hill oak tree to Palace of Westminster' as set out in the London View Management Framework SPG. The presence of the Landmark Viewing Corridor restricts the potential for increased height over much of the existing site.

8.65. The site does not fall within a conservation area, but the Bloomsbury Conservation Area is located to the south east of the site on the opposite side of Euston Road. To the north of the site there are two terraces of listed buildings on North Gower Street: Nos.168 and 170 and Nos.185 -191. Tolmers Square is a green public open space, part of which is included within the site allocation as it is in the same ownership as 250 Euston Road. The whole of the open space is designated as public open space and is protected by Local Plan policy.

8.66. The existing building is used for a range of office, research and development, and healthcare purposes. The building is part 6 storey and part 8 storey with the height stepping down further in response to the lower residential context to the north. The residential blocks in Tolmer Square are 4 storeys, as are the residential terraces on North Gower Street. The existing site includes a small car park on the eastern side.

Identification of site as suitable for a taller building

8.67. The site falls within the Euston Road sub-area. The prevailing character of Euston Road is one of large commercial and institutional buildings. It is punctuated by a number of tall buildings including the Euston Tower, One Euston Square (now demolished as part of HS2 works), Evergreen House (160 Euston Road) and University College Hospital UCH). In addition, to the north-west of the site is the 26 storey Triton Tower (adjacent to Drummond Street). In this context, a redevelopment of the eastern part of the site with a taller building would be an appropriate response to the surrounding context. Due to the LVMF constraints, a tall building in this location would need to be relatively slim and residential would be the most appropriate use given the constrained floorplate and Camden's need for additional homes.

8.68. Site Allocation EA4 outlines that a potential taller building may be appropriate of up to approx. 75m (from ground level / 101m AOD) on the corner of Euston Road and North Gower Street subject to detailed design and testing. A building of this height (approximately 23 residential storeys) would respond to the height of UCH on the opposite side of Euston Road (107.3m AOD), optimising the number of homes that could be provided. The strategic views assessment in the Background Report (proposed submission draft 2026) has not identified any impact from the modelled massing on strategic views (with a height of 25 storeys tested to east of the site).

Reg 19 consultation

8.69. Following the comments received during the Regulation 19 consultation, officers have reviewed this site allocation and while it is considered that detailed design in the context of a planning application is required to establish the exact height, additional testing suggests that a residential building of approx. 53m (79m AOD) may be more appropriate in this location. A building of this height (approximately 16 residential storeys) has the potential to better respond to the indicative height of Site Allocation EA5 'Euston Square Hotel' opposite the site of North Gower Street (65.8m AOD). The relationship between the indicative heights of Site Allocations EA4 and EA5 is important in townscape terms and the proposed reduction in indicative height of EA4 could improve both this relationship and the relationship with the lower residential context to the north of Tolmers Square and North Gower Street which includes listed terraces. The reduction in height would reduce the indicative housing capacity of this site from 115 to 80, a reduction of 35 homes.

8.70. The proposed modification to site allocation EA4 is set out below. The additional proposed text has been highlighted in bold and the deleted text has been struck-through.

Potential location of taller buildings	• ~~A potential taller building may be appropriate of up to approx. 75m (from ground level / 101m AOD) on the corner of Euston Road and North Gower Street subject to detailed design and testing.~~ **A tall building may be appropriate on the corner of Euston Road and North Gower Street subject to detailed design and testing. The final appropriate height will be the product of detailed design within the development management process but initial testing suggests that a residential building of approx. 53m (79m AOD) may be appropriate.** • The height and massing should be tested so as to mitigate impact on residential amenities to the north **and to assess its townscape impact. An application for a tall building should demonstrate how the proposal would make a positive contribution to the area and enhance its townscape characteristics.** • 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.

CUTTING AT PARK VILLAGE EAST (EA6)

Existing context

8.71. This site allocation is in the middle ground of Protected Vista 4A.1 'Primrose Hill to St Pauls Cathedral' and 2B.1 'Parliament Hill oak tree to Palace of Westminster' Granby Terrace Bridge/Hampstead Road (EA7) and in the background WSCA of both Protected Vista 5A.1 'Greenwich Park Wolfe statue to St Paul's Cathedral' and Protected Vista 6A.1 'Blackheath Point to St Paul's Cathedral'.

8.72. The site does not fall within a conservation area but the Regent's Park Conservation Area is immediately to the west, with the boundary running down Park Village East. To the north of the site allocation are a series of Grade II* listed villas on the west side of Park Village East: Numbers 2-16, 22-34, 36A and 36B.

Identification of site as suitable for a taller building

8.73. The site allocation is part of the HS2 construction site and is identified in the London Plan as part of the Euston Opportunity Area. As this site allocation is outside the Central Activity Zone, a tall building is defined as a building which is over 30m in height. This means that a building with a height at the upper end of the indicative general height range for this site allocation, 33 metres / 10 storeys, would qualify as a tall building and would need to demonstrate compliance with Tall Building policy.

8.74. The capacity study found that there was potential for taller buildings of around 12 storeys in this site allocation and that height greater than this would need further testing. Regent's Park Conservation Area Advisory Committee (RPCAAC) has raised a concern that no basis is given in the Plan for this assertion. The rationale for this indicative height is provided in the Background Report (proposed submission draft 2026) which includes the following:

8.75. "*To the east of Park Village East and adjacent to the railway, there is an identified location for tall buildings up to approximately 40m high (around 12 storeys). In this location, tall buildings could be set back from Park Village East, adjacent to the less sensitive context of the railway, and there would be opportunities for the heights of surrounding plots to step down towards the lower heights of Park Village East.*"

8.76. The capacity study also tested the potential for a taller building (16 storey) in this site allocation and the impact on local views is shown in the Background Report (proposed submission draft 2026).

Impact on Regent's Park Conservation Area and Grade II listed villas on Park Village East (2-16, 22-34, 36A and 36B)*

8.77. The northern part of this site allocation is approximately 70m away from the nearest of the Grade II* listed villa (36 Park Village East). The existing context of these

buildings when viewed from Park Village East is mainly defined by the locally listed wall of the railway cutting and the planting in front. More recently a hoarding has been erected on Park Village East which includes an image of the wall and planting.

Existing View



Figure 26: Existing View 12 Park Village East to Euston

Tested Summer View

This viewpoint is just to the north of Mornington Street bridge in the Regent's Park conservation area. Tested massing envelopes in the cutting (site allocation EA6) includes a 12 storey residential building. This could have the potential to affect the setting of Grade II* listed villas on Park Village East and the Regent's Park conservation area. Development proposals would need to consider potential impacts on the setting of these heritage assets and excellent design and careful modelling will be required.



Tested Winter View



Key

Residential use

Non-residential use

Figure 27: View 12 Park Village East to Euston - Tested Massing Envelopes (lower range)



Figure 28: View 12 Park Village East to Euston - Tested Massing Envelopes (upper range)

8.78. The Background Report assessment of local views found that a taller building massing envelope would terminate the view south from Park Village East (figures 27 and 28 above) and therefore there was potential to impact the setting of the Grade II* listed villas on Park Village East and the Regent's Park Conservation Area. A 16-storey building would have more impact on the setting of the conservation area and these listed buildings. However, the height and massing would be clearly set apart from the listed buildings (in the distance, further south and to the other side of the road).

Impact on views from Regent's Park, The Broad Walk looking south east towards Euston Station and setting of Grade I listed 2-11 Gloucester Terrace

8.79. As previously set out, Regent's Park is a Grade I Registered Park which falls within part of the Regent's Park Conservation Area. The conservation area statement sets out key views in the conservation area which include views 'From the Park to the Terraces seeing a clear roofline (without buildings in the background)'. A variety of views have been tested from Regent's Park. The Background Report assessment of local views found that the upper range tested (16 storeys) for the capacity massing of a taller building in this site allocation would appear above the roofline of the Grade I listed 2-11 Gloucester Terrace in some views (Views 20 and 21). The most affected view is view 20 from the northern part of the Broad Walk (see figures 21 and 22). From this viewing point the lower range (12 storeys) would not be visible above the roofline of the listed terrace and, importantly, this is the indicative tall building height set out in the site allocation. In view 21, also from the Broad Walk, the testing

massing of this site allocation in both the upper and lower range was shown to be impeded by tree cover and this would likely be the case even in winter. The capacity model testing demonstrates that a development of 12 storeys would preserve this view of the listed terrace with no harm to its significance.

Soundness of site allocation

8.80. The capacity testing for site allocation EA6 is considered to provide a sound justification for the indicative height for a taller building on this site as the indicative height for a taller building is 12 storeys (i.e. the lower range tested in the capacity model) and the guidance clarifies that any additional height would need to be tested. The guidance for taller buildings in EA6 is set out below.

> *Taller 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. Exceptional quality design and shaped massing should be developed to minimise any impact on the setting of the Conservation areas and listed buildings.*

8.81. The massing modelling provides a sound justification for the indicative housing capacity which is given as 350 homes, as there are a number of possible arrangements for residential blocks and the final number will depend on how much land is enabled for development, including the potential to develop alongside the HS2 headhouse.

Reg 19 consultation

8.82. Following discussion with HE, a modification is proposed to this site allocation which references the wider policy framework and highlights the sensitive relationship with the grade I listed 2-11 Gloucester Terrace . The proposed modification is set out below.

Potential location of taller buildings	• Height should respond to a varied context: from 16m (48-50m AOD) along Park Village East to the north, near the listed buildings and conservation area, to 33m (62m AOD) to the south as a marker to Granby Terrace Bridge to the south. • 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**. • 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. • Development must be designed to respond to the site's context including the nearby Regent's Park Conservation Area and the setting of listed buildings on the west side of Park Village East. • **Proposals resulting in harm will require clear and convincing justification, and will be considered in accordance with National, London and Local Plan policies.** • Full details on heights for this site allocation are provided in the preceding section (Section 4.3)

GRANBY TERRACE BRIDGE / HAMPSTEAD ROAD (EA7)

Existing context

8.83. This site falls within the background WSCA of view 6A.1 Blackheath Point to St Paul's Cathedral and the north western part of the site, behind the terrace housing and adjacent to the railway, falls within the middle ground of Landmark Viewing Corridor 2B.1 Parliament Hill oak tree to Palace of Westminster.

8.84. Part of the site is located within the Camden Town Conservation Area and there are nearby Grade II listed buildings including the adjacent semi-detached houses '261-263 Hampstead Road' and the terrace of houses comprised of 1 Mornington Crescent and 2-12 Mornington Crescent.

Existing View



Figure 29: NEW VIEW 3 - Mornington Crescent towards 1 Mornington Crescent with one of the Ampthill towers on the left (Dalehead) and Greater London House on the far left

8.85. The existing context includes the 4 storey listed houses and terrace on the south side of Mornington Crescent, the 6 storey Greater London House (23m-25m) on the north

side of Mornington Crescent and the 20 storey residential towers on the Ampthill Estate on the east side of Hampstead Road.

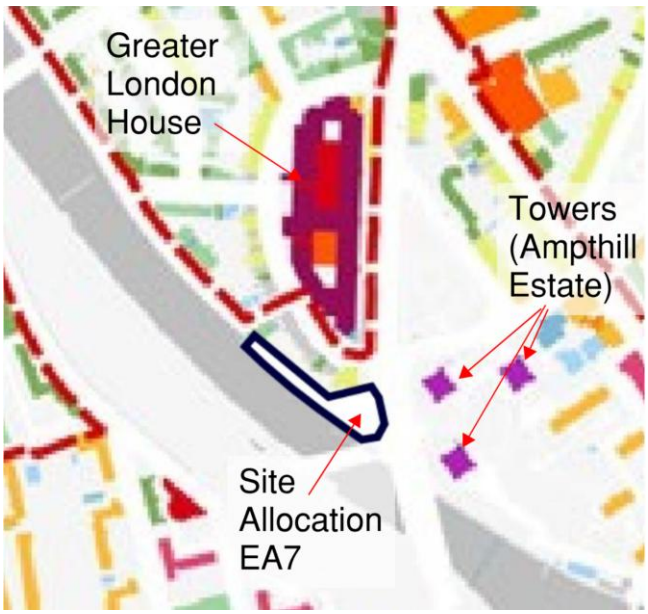


Figure 30: Heights diagram

Identification of site as suitable for a taller building

8.86. The rationale for a tall building in this site allocation is set out in the Background Report (proposed submission draft 2026). This is set out below.

8.87. "*There is a further location identified for a tall building up to circa 40m (66m AOD) at the junction of Granby Terrace and Hampstead Road. Hampstead Road is a main artery and a tall building in this location would act as a marker of Granby Terrace as a key east west link. It would also mediate the height of the towers of the Ampthill Estate on the eastern side of Hampstead Road. This location has a sensitive heritage context consisting of the Grade II listed terrace (Mornington Crescent) and adjacent Grade II listed '261-263 Hampstead Road' to the northwest. Part of this development site (Granby Terrace Bridge / Hampstead Road site allocation EA7) is also in the Camden Town Conservation which continues to the north.*"

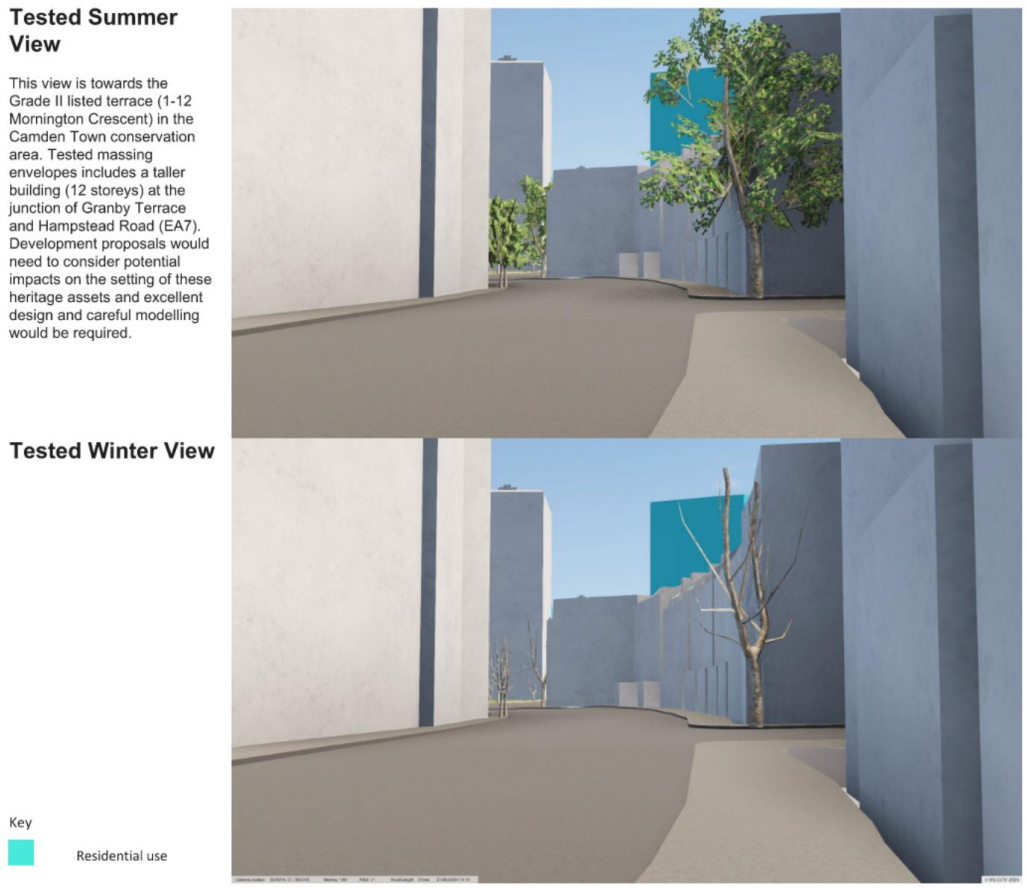


Figure 31: NEW VIEW 3 - Mornington Crescent towards 1 Mornington Crescent - Tested Massing Envelopes (upper range)

Impact on heritage assets

8.88. An assessment of the impact on local views is provided in the background report which includes the following.

8.89. "*A taller building (12 storeys) on site allocation EA7 (Granby Terrace/Hampstead Road) would impact the setting of the Grade II listed terrace (1-12 Mornington Crescent) and the Grade II listed 261-263 Hampstead Road (see New View 3 and 5) in the Camden Town conservation area. Development proposals would need to consider potential impacts on the setting of these heritage assets and excellent design and careful modelling would be required.*"

Soundness of site allocation

8.90. The capacity testing for site allocation EA7 is considered to provide a sound justification for the indicative height of a taller building and the indicative housing capacity of 33 homes. This is identified as *up to* circa 40m (12 storeys), subject to testing of impacts. A building that is less than 40m (12 storeys) is likely to have less impact on the setting of the listed terrace. Equally a more refined massing than the massing envelope tested is also likely to have less impact. Moreover, the site allocation provides an opportunity for redevelopment to provide a more attractive southern entrance to the conservation area than the previous uses of this site.

FORMER MARIA FIDELIS SCHOOL (EA9)

Existing context

8.91. This site is located with the background WSCA of Protected Vista 5A.2 'Greenwich Park Wolfe statue to St Paul's Cathedral' and the western part of the site falls within the middle ground of Landmark Viewing Corridor 2B.1 'Parliament Hill oak tree to Palace of Westminster' as set out in the London View Management Framework SPG.

8.92. To the south of the site there are Grade II listed terraces on North Gower Street (Nos.190-204 on the east side and Nos.211-229 on the west side). Adjoining the site to the north, is the locally listed 108 Hampstead Road (the former St Pancras Charity School for girls). To the north west is the Grade II listed Prince of Wales Public House on Hampstead Road.

8.93. The site adjoins site allocation EA1 (to the north and east) which will accommodate the future HS2 station as well as adjacent station development and public open space. The adjacent station development in site allocation EA1 has been identified as a location for taller buildings (40-60m / 62-84m AOD). The context to the south of the Maria Fidelis site allocation includes a 4 storey residential terrace (including mansard roof) on the south side of Starcross Street and the Exmouth Arms, which adjoins the site allocation to the east, is 3 storey. George Mews, a residential development to the west, is 5 to 6 storeys in height.

Identification of site as suitable for a taller building

8.94. This site was included as a development site in the EAP 2015 and although not identified as a site for a taller building, part of this site is in the shadow of St. Paul's Cathedral in the background WSCA of Protected Vista 5A.2. Since the EAP 2015, the indicative location for taller buildings on the west side of the Euston Station and Tracks site allocation has been expanded to take account of the now demolished, 1 Euston Square and also extended to the north west so that it includes both this site allocation (EA9) and the triangular site to the north (part of site allocation EA1).

8.95. The rationale for extending location A to include this site is both to respond to the potential for taller buildings in the shadow of St Paul's and to reflect the future context of part of this site which will be adjacent to a site identified for taller buildings (EA1). A potential taller building could be located in this site allocation in the shadow of St Paul's Cathedral, up to 90m (115m AOD) subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. Height of 20 storeys and 27-30 storeys has been tested in the upper and lower range of the capacity model, and a further option which redistributes the massing across the site was also explored demonstrating a similar housing number.

Impact on heritage assets

8.96. Regent's Park is a Grade I Registered Park which is part of the Regent's Park Conservation Area. St. Katharine's Danish Church is a Grade II* listed church and

the view 'towards St Katharine's, the Danish Church, with its spires and precinct' is identified as one of the key views in the Regent's Park Conservation Area appraisal.

8.97. The Background Report (proposed submission draft 2026) local views assessment identified that a taller building in this site allocation had the potential to be visible in views from Regent's Park (Views 20 to 26). In many of these views the massing envelope tested was shown to be partially screened by trees and vegetation and this was likely to be the case even in winter. However, in the view from the northern part of the Broad Walk looking towards St Katharine's Church (view 20), the upper range of tested capacity had the potential to distract from the spires of the church in winter due to the height of the modelled massing (part 27, part 30 storeys). As such, future development proposals would need to be designed to consider potential impacts on the Regent's Park Conservation Area and the significance of heritage assets (including the Grade I listed terraces and the Grade II* listed St Katharine's Church) in views from the Grade I Regent's Park.

Soundness of site allocation

8.98. Taking into account the potential impact on heritage, the capacity testing for this site allocation is considered to provide a sound justification for the indicative height of a potential tall building as the site allocation sets out a height of *up to* 90m (which equates to 27 residential storeys). This is slightly less than the upper range tested in the capacity model (which was part 30 storeys) and allows for mitigations through careful design. The range in housing capacity (between 175 and 250 homes) reflects the different options that were modelled which demonstrate that a number of different arrangements could deliver housing capacity in the range identified which allows for proper consideration of the impact on St Katharine's Church at detailed design stage while delivering housing in the indicative range.

Reg 19 consultation

8.99. HE raised a concern in relation to view 20 and the impact of tall buildings on the view of the Grade II* St Katharine's Church from Regent's park. HE's full comment is set out below:

8.100. "*We consider the modelling within the background report clearly demonstrates harm to the setting of the Church from site allocations EA9 and EA10. The open nature of this area of Regent's Park creates the ability appreciate the twin spires of the Church through an uninterrupted view with an open sky background. Given its height and the twin spires, the Church is highly prominent in this view, appearing above the tree line and being taller than other buildings visible. The proposed site allocations would appear beside and behind the Church, distracting from this prominence and competing with the spires for attention.*"

We note the inclusion of text within the site allocation polices that proposals are subject to testing of impacts on LVMF and relevant local views. Given the significance of St Katharine's Church, and the contribution of its setting to this

significance, we consider that specific text to ensure proposals conserve its significance should be included here."

8.101. Following conversations with HE, modifications are proposed to site allocation EA9 to highlight the sensitivity of St Katharine's Church, highlighting existing NPPF, London and Local Plan policies as shown below (additional text in bold).

Potential location of taller buildings	• The proposed heights should respond to a varied context, with lower 4-7 storeys to the south, up to approx. 10 storeys on Hampstead Road and a potential taller building could be located in the shadow of St Paul's Cathedral, up to 90m (115m AOD) subject to testing of impacts on strategic views in the London View Management Framework and relevant local views. **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.** • The massing of any tall building should be a slender so as to provide generous and inclusive green public open space with a comfortable microclimate. Open space will need to be provided on site in order to support the delivery of a tall building. • The form and scale of a taller building should respect the amenity of neighbouring residents.
	• A full justification and demonstration of impacts on the LVMF, local views and its close neighbours would need to accompany proposals for a tall building in this location. • 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.

REGENT'S PARK ESTATE NORTH (EA10)

Existing context

8.102. This site allocation is in the middle ground of Protected Vista 4A.1 'Primrose Hill to St Pauls Cathedral' and 2B.1 'Parliament Hill oak tree to Palace of Westminster' and in the background WSCA of both Protected Vista 5A.1 'Greenwich Park Wolfe statue to St Paul's Cathedral' and Protected Vista 6A.1 'Blackheath Point to St Paul's Cathedral'.

8.103. The site does not fall within a conservation area but the Regent's Park Conservation Area is immediately to the west with the boundary running down Augustus Street. The Euston Historic Area Assessment (2014) describes the heights in the upper part of the Regent's Park Estate as follows: "The area is dominated by the eleven storey slabs perpendicular to Robert Street and the nine storey L shaped slabs along Stanhope and Harrington Streets". There are also contrasting lower height blocks within the estate including the Children's Centre (part single, part 2 storey) and Stanhope Parade (3 storey) which are both part of the site allocation. The blocks on the west side of Augustus Street (within the conservation area) are 4 and 6 storey.

Identification of site as suitable for a taller building

8.104. Given the surrounding context height, the site has been identified as having potential for taller buildings. Due to LVMF constraints, taller buildings would need to be on the western side of the site allocation. The site allocation states that a taller building up to approximately 15 storeys may be appropriate subject to further testing of impacts on strategic views in the London View Management Framework and relevant local views. As this site allocation is outside the Central Activity Zone, a tall building is defined as a building which is over 30m in height. This means that a building with a height at the upper end of the indicative height range for this site allocation, 33 metres / 10 storeys, would qualify as a tall building and would need to demonstrate compliance with Tall Building policy as part of a planning application.

Impact on heritage assets

8.105. As previously set out, Regent's Park is a Grade I Registered Park which is part of the Regent's Park Conservation Area. St. Katharine's Danish Church is a Grade II* listed church and the view 'towards St Katharine's, the Danish Church, with its spires and precinct' is identified as one of the key views in the Regent's Park Conservation Area appraisal.

8.106. The local views assessment identified that a taller building in this site allocation had the potential to be visible in views from Regent's Park (Views 20 to 24). In many of these views the massing envelope tested was shown to be partially screened by trees and vegetation and this was likely to be the case even in winter. As with the Maria Fidelis site allocation (EA9), the potential for the Regent's Park Estate North site allocation to impact the setting of St Katharine's Church was identified in view 20 (from the northern part of the Broad Walk looking towards St Katharine's Church). The impact of massing was lessened in the lower range as the massing did not appear behind the spires of the church. However, the lower range massing height was still identified as having the potential to distract from the prominence of the church spires.

8.107. The capacity massing is only indicative and future development proposals will require a more detailed design process resulting in an appropriate design led architectural response, including a refined massing composition which will need to take into account the significance of this listed church, and the setting of the Regent's Park conservation area and the Grade I registered park.

8.108. Further views testing will be required for future development proposals to understand the extent of any impacts on the view towards St Katharine's, the Danish Church in the light of a detailed design.

Soundness of site allocation

8.109. Taking into account the potential impact on heritage, the capacity testing for this site allocation is considered to provide a sound justification for the indicative height of a potential tall building, as the site allocation sets out a height of *up to* 15 storeys *"may be appropriate subject to testing of impacts on strategic views in the London View Management Framework and relevant local views".* The massing options tested show a range of building heights demonstrating scope to redistribute capacity or reduce the height of taller elements without significantly affecting housing capacity. With this in mind, the indicative housing capacity of 450 homes is conservative to allow for potential reductions or redistributions and the capacity model provides a sound justification for the indicative housing capacity.

Reg 19 consultation

8.110. Following Regulation 19 submissions from Historic England and the Regent's Park CAAC and subsequent conversations with HE, modifications are proposed to highlight the sensitivity of the setting of the church more explicitly and to highlight existing NPPF, London and Local Plan policies. The modifications to site allocation EA10 also take account of HE's concerns with potential impacts on Protected Vista 4A.1 'Primrose Hill: the summit – looking toward St Paul's Cathedral'.

Potential location of taller buildings	• 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. ***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.*** • ***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.*** • **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).

CAPITAL CITY COLLEGE (EA11)

Existing context

8.111. The eastern part of this site allocation is in the middle ground of Protected Vista 2A.1 'Parliament Hill summit to the Palace of Westminster'. The Regent's Park Conservation area is to the west, and opposite the site on the eastern side of Stanhope Street is the locally listed '184 to 192 Drummond Street and 40 to 46 Stanhope Street'.

8.112. In the Euston Historic Area Assessment (2014) this site falls within the lower Regent's Park Estate character area. The heights in this character area are mainly four storeys with two twelve storey slabs and two nineteen storey towers. Immediately to the north of the site allocation is Bucklebury Tower (19 storey residential tower), to the south west is Longford House, a part 6-storey, part 9-storey residential building and to the south is Regent's Place (a predominantly office development) with the 9 storey (45m) 1 Triton Square opposite the site. Planning permission has been granted on appeal for a 15 storey student accommodation building at 17-37 William Road (located at the corner of William Road and Stanhope Street). The existing education building on this site is 5 storey with a set-back 6th storey.

Identification of site as suitable for a taller building

8.113. Given the surrounding height context, the site has been identified as having potential for taller buildings. The site allocation states that a tall building may be appropriate on the site up to approx. 13 storeys subject to testing of impacts on strategic views in the London View Management Framework and relevant local views.

Impact on heritage assets

8.114. The Background Report (proposed submission draft 2026) identifies that a taller building on this site would be visible in views from Regent's Park (View 25 and 26). The Background Report provides the following assessment of view 25.

8.115. "*This view from the outer circle is towards Grade I listed buildings at St Andrews Place in Regent's Park (Grade I Registered Park) in the Regent's Park conservation area. Tested massing envelopes includes Capital City College (EA11) with development adjacent to the station (W/ ASD1) in the background. Partial screening would be provided by existing foliage in summer. Development proposals would need to consider potential impacts on the setting of these heritage assets.*"

8.116. A similar assessment is provided for view 26 which is also a view from the outer circle but at a greater distance from the listed buildings at St Andrews Place.



Figure 32: View 25 - Outer Circle / Park Square junction looking east towards Euston Station Tested Massing Envelopes (upper range)

8.117. While view 25 shows that massing would be visible in winter, it is noted that development in the Regent's Place campus including Euston Tower (which has permission to be redeveloped) already provides a modern context to the historic foreground in this view. Closer to St Andrew's Place, the part 9 and part 10 storey 'The White House' (Grade II) on Albany Street would be visible immediately behind St Andrew's Place.

8.118. The most significant views of the listed buildings are close ones from St Andrew's Place where their composition and detailed design can be appreciated in relation to each other and within the contemporary close setting of the Regent's Park conservation area. From St Andrew's Place, the height and massing of this site allocation is likely to be less visible.

Soundness of site allocation

8.119. Taking into account the potential change to the setting of the listed buildings, the capacity testing for this site allocation is considered to provide a sound justification for the indicative height of a potential tall building, as the site allocation sets out a height of *up to* approx. 13 storeys subject to testing of impacts on strategic views in

the London View Management Framework and relevant local views. Future development proposals will require a more detailed design process resulting in an appropriate design led architectural response, including a refined massing composition which can take into account the significance of affected heritage assets, the setting of the Regent's Park conservation area and the Grade I registered park and the more recent context. Given this, the capacity testing for this site allocation provides a sound justification for the indicative housing capacity (70 homes).

9. CONCLUSION

9.1. The Council considers that the evidence base of the historic environment that has been prepared for the EAP Update is proportionate, relevant and up to date and provides a sound base for the Plan's proposals - in line with the National Planning Policy Framework and London Plan policy HC1A 'Heritage conservation and growth'.

9.2. The Council has worked to develop a positive strategy for the conservation of the historic environment. The design principles and the policies in relation to strategic and local views in the EAP Update demonstrate a positive strategy for the conservation of the historic environment.

9.3. The EAP Update builds on the strategy developed for the adopted EAP 2015 and includes opportunities to improve the historic environment. The LVMF views assessment demonstrates how comprehensive redevelopment at Euston including the demolition of 1 Eversholt Street would result in an improvement to Protected Vista 4A.1 (Primrose Hill to St Paul's Cathedral) as the ability to recognise and appreciate the peristyle, drum and dome of St Paul's would be enhanced. Likewise, there is an opportunity to improve Protected Vista 5A.2 with a replacement for the now demolished 'One Euston Square' with a building which has less of an impact on this view and preserves the ability to recognise and appreciate St Paul's Cathedral in this panorama. Strategic Principle EAP 2: Design includes the key design principle that development proposals should preserve or enhance heritage assets and their settings. Comprehensive redevelopment of site allocation EA1 has the potential to deliver improvements to the setting of St Paul's Cathedral in these views in accordance with the NPPG and London Plan Policy HC4 'London View Management Framework'.

9.4. The evidence base seeks to assess and highlight opportunities for development and to identify a broad capacity for the EAP update, which is proportionate at plan making stage, rather than developing fully designed proposals. As such, it is unrealistic to seek to draw definitive conclusions on how future proposals would impact the setting of heritage assets, however the evidence base supports the capacities included in the allocation policies and shows that the plan will be effective. The potential impacts have been considered through the design capacity work and wording has been included in the policies and site allocations which highlights, as one would expect when dealing with tall buildings, that further modelling and design will be required and the exact locations and heights will be established through the planning

application process, with a full assessment of heritage impacts (including their setting) forming an essential part of this.

9.5. Where comments have been made on specific wording, the Council has worked with Historic England to propose modifications[2] which seek to provide clarity in relation to the protection of heritage assets and their settings, in many cases this includes highlighting aspects of the existing policy framework for completeness. As a result, modifications are proposed to the following parts of the EAP Update. The modifications also take account of comments from the Regents Park CAAC and, for site allocation EA4, from residents and other stakeholders received during the Regulation 19 consultation.

- Strategic Principle EAP 2: Design (parts D and E)
- Supporting text to chapter 3.3 Design Strategy: 'Building heights, massing and scale'
- Supporting text to chapter 4.1 Euston Station and Tracks in the 'Protecting and enhancing strategic views and heritage assets:'
- Site Allocations
    - Euston Station and Tracks EA1
    - Royal Mail EA2
    - Euston Circus building EA4
    - Cutting at Park Village East (EA6)
    - Former Maria Fidelis School (EA9)
    - Regent's Park Estate North (EA10)

9.6. The EAP Update is positively prepared, justified, effective, and consistent with national and regional policy in relation to heritage matters. Indicative heights provided in the Design Strategy, the Places chapters and in Site Allocations are the product of a design led capacity assessment. A full design assessment will be required at the point of application against all relevant Development Plan policies including London Plan Policy D9 which allows for some appropriate refinement of site capacity through development management.

[2] *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.*

Appendix 1

Euston Area Plan Site Allocations: Heritage Impact and Mitigation

INTRODUCTION

A review of the heritage evidence base (including the support documents set out below) was conducted to identify designated heritage assets both within and nearby proposed site allocations. When developing the site allocations, officers considered heritage impacts and how heritage assets could be affected by the proposed site allocations' development. The heritage context fed into the design led capacity work and the identification of appropriate locations for tall buildings, the indicative heights for such tall buildings and the development of appropriate design principles for each site allocation taking into account the need to avoid and minimise heritage impact.

In developing the site allocations consideration was given both to immediate impacts, where heritage assets were on or adjacent to sites, and to their wider setting in the assessment of local and LVMF views. As this exercise was primarily aimed at establishing indicative heights and site capacities, the modelling does not reflect a proposed scheme, and policies in the EAP Update highlight the need for further modelling, testing and detailed design to develop an appropriate scheme. The capacity model was used to inform site allocations and heights guidance and provides a proportionate evidence base, allowing the necessary judgements to be made as to what is likely to appropriate for the given sites. The need for further assessment is particularly relevant for the station and tracks site allocation where there is uncertainty about station designs and what land will be enabled for construction. Full consideration of heritage impacts will inform exact heights and massing during the detailed design stage for development proposals and in line with policy D5 – Historic Environment, of the 'Proposed Submission Draft Camden Local Plan 2025', applications with the potential to affect a heritage asset or its setting must be supported by a Heritage Statement.

The following pages set out an overview of the significance of the identified heritage assets and how the sites which have been allocated contribute to the significance of them. With the heritage significance of each asset and its sensitivity to the development of the site established, the potential level of harm to the significance of the asset was assessed in accordance with step 3 of Historic England's HEAN 3 (2015). This level was assigned in relation to the harm that an asset might experience, but the descriptive assessment also identifies any neutral or beneficial changes where applicable.

The assessment also sets out potential mitigation and opportunities to enhance the significance and setting of heritage assets, and how this has been considered in the site allocation, noting that a full heritage assessment will need to be carried out at the planning application stage (in accordance with national decision making policy HE5).

Potential harm to asset	Criteria
High	The significance of the heritage asset could be lost or substantially harmed.
Medium	The significance of the heritage asset could be harmed but not substantially.
Low	The significance of the heritage asset could be harmed but that harm would be minor.
None	The significance of the heritage asset will not be harmed.

The assessment of potential effects is based upon the capacity massing envelopes associated with the lower and upper range of homes and jobs with reference to the strategic and local views assessment in the Background Report (proposed submission draft 2026). The heritage impact assessment provides a strategic assessment of the potential for harm to heritage assets arising from development within the site allocations. As detailed proposals for the sites are not available (site layout, building scale and massing etc.) and the assessment of heritage impacts is based on massing envelopes, the assessment cannot draw conclusive statements regarding the potential effects or definitive levels of harm. Detailed assessments would need to be undertaken as part of any subsequent planning applications. Therefore, where potential harm to heritage assets has been identified, there would be opportunities to mitigate this harm through the detailed design process.

SUPPORTING DOCUMENTS

- Euston Community-led Heritage Assessment
- Euston Area Plan Historic Area Assessment, Allies and Morrison 2014
- London View Management Framework (2012)

- Camden Council Conservation Area Appraisals and Management Plans
- Camden's Local List 2015
- Historic England Guidance GPA3, The Setting of Heritage Assets
- The Historic Environment and Site Allocations in Local Plans Historic England Advice Note 3 (2015)
- Camden Building Heights Study

EA1 EUSTON STATION AND TRACKS

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
St Paul's Cathedral (Grade I)	St Paul's was designed by Christopher Wren and completed in 1710 and is one of the finest examples of English Baroque architecture. Its iconic dome remains a feature of London's skyline and is protected in a number of LVMF views. The site does not contribute to the significance of St Paul's. The now demolished tower at 1 Euston Square was previously visible within long distance views of St Pauls.	The massing tested includes massing in the Wider Setting Consultation Area (WSCA) of the LVMF. The impact varies depending on each location and while the setting of St Paul's exceeds the LVMF the key views outlined below provide suitable locations for the assessment of potential impacts. **LVMF view 4A.1 Primrose Hill: the summit - looking toward St Paul's Cathedral** The existing tower (1 Eversholt Street) to the south of the Network Rail station has been identified as reducing the viewer's appreciation of the dome and drum of St Paul's Cathedral (*London View Management Framework 2012 para. 129)*. Development Principle EAP 1 'Euston Station and tracks' expects a comprehensive approach to development at Euston Station which would include the redevelopment of the station piazza, 1 Eversholt Street and the Podium, and former sites of 1 Euston Square and Grant Thornton House. The redevelopment of 1 Eversholt Street provides an opportunity to enhance view 4A.1 and the setting of St Paul's. Given the expectation of comprehensive redevelopment at the front of the station, the EAP capacity model has assumed the demolition of 1 Eversholt St.

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		The LVMF Strategic views assessment set out in the Background Report has helped to identify those site allocations which could have the potential for greatest effect on view 4A.1. They are site allocations EA1 (Euston station and tracks), EA10 (Regent's Park Estate) and EA2 (Royal Mail). This effect is reduced when these sites deliver their minimum tested capacity. Given the assumed demolition of 1 Eversholt Street, the overall effect of the minimum tested capacity would be beneficial. Likewise, while development heights and massing in the wider setting consultation area and in the wider panorama have the potential to affect this view when sites deliver their maximum tested capacity, the redevelopment of 1 Eversholt Street provides an opportunity to enhance this view. Following discussions with Historic England, modifications are proposed to the design chapter of the EAP Update and relevant site allocations which strengthen references to NPPF, London and Local Plan policies. The proposed additional wording notes that the impact of future development in strategic views could be mitigated by having variation in heights and shaped massing and highlights London Plan policy in terms of the avoidance of massing and height which causes canyon effects. **LVMF View 5A.2 Greenwich Park: the General Wolfe Statue – looking toward St. Paul's Cathedral** The demolition of One Euston Square as part of the HS2 construction has enhanced the view of St Paul's Cathedral in this view. The EAP identifies an opportunity to replace this building with one of similar or lower height. This reflects discussions officers have had with the GLA in relation to the potential for a tall building at the south-west corner of the station as a replacement for One Euston Square. The EAP Update sets out that such development would need to be carefully sited to avoid harm and should seek to make a positive contribution to the strategic viewing corridors.

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
		Plot S/0SD1 is the massing modelled for a replacement building to One Euston Square in the south west corner of the station as part of the capacity testing for site allocation EA1 (Euston station and tracks). While it is visible in view 5A.2, the tested massing envelope has been reduced in height so that it is lower than the demolished One Euston Square and the massing has been modulated to demonstrate that it should be possible to minimise the effect and allow space for sky in between the massing and the peristyle with careful design and siting of buildings within the station site. The massing immediately behind the peristyle is the shoulders of the model massing for plot W/SD1, to the south of site allocation EA1. There is an opportunity for a fully designed scheme to further refine this to ensure that the dome remains well defined against the background. Tall buildings at the both the lower and upper end of the indicative height range have the potential to result in a medium level of harm to St Paul's Cathedral. The impact of future development has the potential to be minimised though stepping back the massing and sympathetic materials. Modifications are proposed to the design chapter of the EAP Update and site allocation EA1 which strengthen references to NPPF, London and Local Plan policies and further emphasize strategic view guidance in the EAP Update supporting text. **LVMF View 6A.1: Blackheath Point - near the orientation board - looking toward St. Paul's Cathedral** The LVMF Strategic views assessment set out in the Background Report has helped to identify those site allocations which could have the greatest effect on this view. They are site allocations EA1 (Euston

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
		station and tracks) and EA6 (Cutting at Park Village East). Model massing to the south (SNR/2) and north (MNR/2) of site allocation EA1 appears behind one of the western towers of St Paul's Cathedral as does the model massing for site allocation EA6. This effect is reduced when these sites deliver their minimum tested capacity. The capacity model includes massing which has been modulated so as to be within the existing roofscape helping to minimise the impact. Nevertheless, this has the potential to result in a low level of harm from the increased backdropping of the western towers by height and massing of the lower and upper capacity range. The impact of future development has the potential to be minimised though having variation and breaks in the massing and sympathetic materials.
Royal College of General Practitioners, 1-9 Melton Street (Grade II*)	The building was constructed between 1906 and 1908 as the headquarters of the London, Edinburgh and Glasgow Assurance Company. It was designed in a Greek revival style with Portland stone facades with substantial Iconic columns. The building was originally designed opposite Euston Square and this relationship continues to be important. However, it was separated from Euston Station by rows of terrace houses. Following the 1960s station redevelopment, these terraces were demolished and replaced with office towers. The current taxi rank detracts away from the significance of the Listed Building and the original relationship with Euston Square. Euston Station contributes to the significance of the building	It is noted that the setting of this Grade II* listed building previously included the towers of Grant Thorton House and One Euston Square, both now demolished as a result of HS2 works. Grant Thornton House was sited immediately opposite 1-9 Melton Street. The contextual heights to the south of Euston station have been assessed, including precedents of height on Euston Road. Opportunities for height has been identified to the north of Euston Square Gardens (ESG) in site allocation EA1. Effects to the heritage assets to the south are expected to be minimised by modulated massing and excellent design. The reinstatement of Euston Square Gardens will restore the relationship between the Listed Building and the historic townscape. The townscape within this area has continually evolved, first with terraces followed by the 1960s redeveloped Euston Station and commercial development to the south, as such there is potential for buildings of additional massing to sit comfortably within the setting of this listed building and result in no harm subject to a high quality design and appropriate detailing.

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
Euston Square Gardens (protected London square) and railings around square (Grade II)	The gardens are significant as both a surviving fragment of early 19th century townscape but also due to the setting for Euston Station and the role it played in creating a civic entrance to the station. Euston Square Gardens is compromised by the current bus station arrangement, the layout of the gardens and the dominance of Euston Road traffic as well as temporary uses for HS2 construction and the temporary taxi Rank.	Height to the south of the station has been assessed in its context, including precedents of height on Euston Road. Opportunities for height have been identified to the north of ESG. Effects to the heritage assets to the south are expected to be minimised by modulated massing and excellent design. The setting of Euston Square Gardens has continually evolved. The increase in building heights has the potential to have a harmful relationship to the Square causing a medium level of harm. Modulating heights and sensitive and high quality architecture has the potential to minimise the level of harm. Future development is expected to reinstate Euston Square Gardens which will be beneficial. There is also an opportunity to enhance the Square through exploring opportunities to review and upgrade the existing bus facilities at Euston to improve the setting of the gardens.
Lodges, Euston Square Gardens (Grade II)	The significance of the lodges is related to forming part of the original Euston Station development which framed the approach to the original station. The site currently contributes a small degree to their significance but this is largely to do with the relationship with the buildings and Euston Station. The setting of the Lodges is compromised by the poor public realm, the dominance of Euston Road traffic as well as temporary uses for HS2 construction and the temporary taxi Rank.	The setting of the Lodges at Euston Square Gardens has continually evolved. The increase in building heights has the potential to impact the setting of the Lodges causing a medium level of harm. Modulating heights and sensitive and high quality architecture has the potential to minimise the level of harm. Future development has the potential to repair the relationship between the Lodges and any new railway terminals. It will also introduce improvements to Euston Square Gardens and opportunities to review the operation of the existing bus facilities which is likely to improve the setting of the lodges.

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
Robert Stephenson Statue (Grade II)	The statue was sculpted by Carlo Marochetti and erected in 1871 and is representative of a high quality example of Victorian commemorative sculpture. It originally stood between the two entrance loges in Euston Square and is the only survivor of the formal 1870 layout which, with the Doric Arch was destroyed in 1969.	The statue has moved historically but has always had an association with Euston Station. There is the opportunity for increased interpretation of the statue to aid in the public understanding of this key historical figure. Subject to a sensitive location, the relocation of the statue has the potential to result in no harm.
War Memorial, Euston Square Gardens (Grade II*)	The significance is derived from being a high quality war memorial. It has group value with the Grade II listed station lodges of 1870 which frame the views of the memorial from Euston Road. The site contributes to the significance of as a result of the association with the railway terminal.	Future development offers the potential to enhance the setting of the war memorial through the sensitive redevelopment of Euston Square Gardens.
Fire Station, 172 Euston Road (Grade II*)	The Fire Station was constructed 1902-1903 for the London County Council Fire Brigade and designed by H.F.T. Cooper of the LCC Architects' Department. It is designed in a picturesque Arts and Crafts style with red brick facades, Portland stone dressings and lively roofline. The building was originally designed opposite Euston Square and this relationship continues to be important. However, it was separated from Euston Station by rows of terrace houses. Following the 1960s station redevelopment, these terraces were demolished and replaced with an office tower and raised podium block with bus station below. The current taxi rank detracts from the	Height to the south of the station has been assessed in its context, including precedents of height on Euston Road. Opportunities for height has been identified to the north of Euston Square Gardens. The reinstatement of Euston Square Gardens will restore the relationship between the listed building and the historic townscape. The townscape within this area has continually evolved, first with terraces followed by the 1960s redeveloped Euston Station with commercial development to the south. As such there is potential for buildings of additional massing to sit comfortably within the setting of this listed building and result in either no or a low level of harm.

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
	significance of the Listed Building and the relationship with Euston Square.	
The Royal George, 8-14 Eversholt Street (Grade II)	The Public House was rebuilt in 1939-40 for Truman, Hanbury and Buxton to designs by A.E.Sewell. It is a well-preserved example of a late inter-war pub, characterised by its robust stock-brick facades with artificial stone dressings, curved corner elevations distinctive relief eagle sculptures at roof. Internally, the building retains its 1930s decorative features such as veneered panelling, original bar counters and ornate chimney pieces. The relationship with the public house and the railway station is of note but the existing buildings within the setting do not contribute to the building's significance.	Height to the south of the station has been assessed in its context, including precedents of height on Euston Road. Opportunities for height have been identified to the north of ESG. The original setting has been altered. However, the relationship between the public house remains important. There is the potential for new development to result in no harm subject to a suitable high quality design. Opportunities to better link the railway station to this part of Eversholt Street could improve the setting. The townscape within this area has continually evolved, first with terraces followed by the redeveloped 1960s Euston Station and an office tower and raised podium block with bus station below. As such there is potential for buildings of additional massing to sit comfortably within the setting of this listed building and result in no harm.
Friends' Meeting House, 173-177 Euston Road (Grade II)	The significance of the building is derived from its architectural qualities as a refined example of neo-Georgian design by the notable Quaker architect, Hubert Lidbetter. It demonstrates a considered use of materials, with restrained detailing both externally and internally. Within the building it retains numerous original fixtures and fittings. It is notable for its group value with the two listed late-c19 Classical lodges belonging to Euston Station opposite, and with 30 Euston Square, Beresford Pite's Office building of 1906-08 and Bentham House.	Height to the south of the station has been assessed in its context, including precedents of height on Euston Road. Opportunities for height have been identified to the north of ESG. Effects to the heritage assets to the south are expected to be minimised by modulated massing and excellent design. Any future development has the opportunity to enhance the significance through reinstatement of the relationship with Euston Square. The harm has the potential to be low.

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
	The site currently does not contribute to the significance.	
116 Drummond Street (Grade II)	The significance of the building is derived from good quality terraced house with vehicle opening to Charles Place dating from circa 1820-25.	Height to the south of the station has been assessed in its context, including precedents of height on Euston Road. Opportunities for height has been identified to the South-West of the station site. Height and massing in this location is likely to affect the views from the west including Drummond Street heritage assets. Any future developments will be visible at the end of Drummond Street. However, the consistent historic townscape of the street will continue to be read and the relationship with the railway will continue. While there would be a change to the setting, there would be no change to the heritage significance of this listed building, or to the ability to appreciate that heritage significance, as a result of development of this scale. Overall, the proposed site allocation is not considered to result in harm.
131 Drummond Street (Grade II)	The building is a late Georgian terraced housing dating to circa 1820-25. It is a modest and well-proportioned example of early 19th century urban development constructed in stock brick and rising to 3 storeys. The relationship of the Listed building to the site has evolved and changed over the years with the development of the Euston Station. Drummond Street development in the early 19th century when the area developed to serve nearby Euston and Somers Town and remains a representative fragment of the area's pre-railway urban fabric.	Height to the south of the station has been assessed in its context, including precedents of height on Euston Road. Opportunities for height has been allocated to the South-West of the station site. Height and massing in this location have the potential to affect the views from the west including Drummond Street heritage assets. Any future developments will be visible at the end of Drummond Street. However, the consistent historic townscape of the street will continue to be read and the relationship with the railway will continue. While there would be a change to the setting, there would be no change to the heritage significance of this listed building, or to the ability to appreciate that heritage significance, as a result of development of this scale. Overall, the proposed site allocation is not considered to result in harm.

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
137 Drummond Street (Grade II)	The building's significance is derived from being a well-preserved 19th century public house. It is constructed of brick with stucco. The building reflects the development of Drummond Street as a mixed commercial and residential area with the arrival of the railway in 1837. The relationship of the Listed building to the site has evolved and changed over the years with the development of the Euston Station. Drummond Street development in the early 19th century when the area developed to serve nearby Euston and Somers Town and remains a representative fragment of the area's pre-railway urban fabric.	Height to the south of the station has been assessed in its context, including precedents of height on Euston Road. Opportunities for height has been identified to the South-West of the station site. Height and massing in this location is likely to affect the views from the west including Drummond Street heritage assets. Any future development will be visible at the end of Drummond Street but is unlikely to harm the setting of the public house the qualities of the building are best appreciated in closer and more direct views. While there would be a change to the setting, there would be no change to the heritage significance of this listed building, or to the ability to appreciate that heritage significance, as a result of development of this scale. Nevertheless, excellent design including modulated massing and architectural character would be expected for future development proposals.
184 to 188 North Gower Street, 190-204 North Gower Street (Grade II), The North Gower Hotel (190-198 North Gower Street) (Grade II)	The significance of these budlings is derived from them as a group of early-19th century houses. They are good examples of planned residential expansion of north London pre-Euston Station. The site contributes little to the significance of the terraces.	Massing to the south-west of the station affects the views from the west including Drummond Street heritage assets. Excellent design including modulated massing and architectural character will need to be developed in application stages. The site is not visible from the majority of the terrace. As such, the tested massing has little effect on the setting of these buildings. Given the limited visibility, there would be no change to the heritage significance of these listed terraces, or to the ability to appreciate that heritage significance, as a result of development of this scale. Overall, the proposed site allocation is not considered to result in harm.

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
Chester Terrace, Regent's Park (Grade I)	The terrace was originally conceived by John Nash and constructed in 1825 by James Burton, circa 1825. It forms a grand palace-style terrace of 27 houses and 5 semi-detached houses and is one of the longest unbroken facades in Regent's Park. The site allocation is currently not visible from any locations and does not contribute to the significance of the terraces	The local views assessment shows that taller buildings in location B to the north east of the station (site allocations EA1 and EA2) have the potential to affect the setting of Grade I Regent's Park and Grade I Chester Terrace from the Inner Circle/Chester Road view (local view 24). The capacity model massing has been developed in a range of heights and massing (lower and upper range) showing the possibility for minimising effects on the setting of Chester Terrace. In addition, the model massing has been developed so that any height that is visible is kept as low as possible and the furthest south as possible so as to result in a massing that is off-centred from the view, and partially hidden, nestled into the tree canopies. It is noted that Brill Tower is already visible above Chester Terrace and is a prominent feature in this view. Additional buildings visible above the terrace will result in a degree of harm but would not undermine the composition or the grandeur of the terrace. The EAP provides a broad indicative range for taller building heights in location B (40-60m). Tall buildings at the lower end of the indicative height range have the potential to result in a low level of harm. Tall buildings at the upper end of the indicative height range have the potential to result in a medium level of harm. In discussion with HE, modifications are proposed to the design chapter (including parts D and E of 'Strategic Principle EAP 2: Design') which strengthen references to NPPF, London and Local Plan policies, seeking to highlight the need to avoid/ and or minimise harm to the significance of heritage assets and their settings. Noting that proposals resulting in harm will require clear and convincing justification, and will be considered in accordance with National, London and Local Plan policies.
Cumberland Terrace and Cumberland	The significance of the terrace is derived from being an excellent example of a complete	The local views assessment shows that taller buildings both in location B, in site allocation EA1, and in site allocation EA10

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Place, Regent's Park	Regency Terrace associated with Regents Park and designed by John Nash. The site allocation does not contribute to the significance of the listed building.	(Regent's Park Estate North) has the potential to affect the setting of Grade I Regent's Park and Grade I Cumberland Terrace in longer views across Regent's Park from the Broad Walk (view 20, looking south east towards Euston Station). More recent photography demonstrates that tree cover, even in winter, would limit the visibility of development to the south-east. It is noted that within this view there area already isolated locations where tall buildings are visible. Additional visible buildings will result in a degree of harm but will not undermine the composition or the grandeur of the terrace. Tall buildings at the lower end of the indicative height range have the potential to result a low level of harm. Similarly tall buildings towards the upper end of the indicative height range also have the potential to result in a low level of harm. It should be noted that the capacity massing is only indicative and will evolve at the detailed design stage to ensure an appropriate design led architectural response, including refined massing composition. It is also noted that in closer range views (new view 1 and 2), where the grandeur of the terrace is more easily appreciated, tested capacity massing in this site allocation was not visible.
St. Katharine's Danish Church, (Grade II*)	St Katharine's College Chapel, now the Danish Lutheran Church in London. 1826-1828. By Ambrose Poynter. For the Royal Hospital of St Katharine. Restored 1969. The view 'towards St Katharine's, the Danish Church, with its spires and precinct' is identified as one of the key views in the Regent's Park Conservation Area appraisal. The street skyline is punctuated by the brick and stone churches and spires of St	The local views assessment shows that taller buildings both in location B in site allocation EA1 and in site allocation EA9 (Maria Fidelis) and EA10 (Regent's Park Estate North) have the potential to affect the setting of the Grade II* St Katharine's Church in views across Regent's Park from the Broad Walk (view 20, looking south east towards Euston Station). There would also be a potential effect on the setting of both the Regent's Park Conservation Area and of the Grade I Regent's Park. More recent photography demonstrates that tree cover, even in winter, would impede the visibility of development to the south-east. Tall buildings at the lower end of the indicative height range have the

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	Katharine's Danish Church which is currently set with trees and planting with a background of clear sky.	potential to result in a low level of harm. Similarly tall buildings towards the upper end of the indicative height range also have the potential to result in a low level of harm. In discussion with HE, modifications are proposed to the design chapter (including parts D and E of 'Strategic Principle EAP 2: Design') which strengthen references to NPPF, London and Local Plan policies, seeking to highlight the need to avoid/ and or minimise harm to the significance of heritage assets and their settings. Noting that proposals resulting in harm will require clear and convincing justification, and will be considered in accordance with National, London and Local Plan policies. In addition, modifications are proposed to relevant site allocations to highlight that 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. Further views testing will be required for future development in the context of specific proposals, to understand the extent of any effects of the detailed designs.
Church of St Mary the Virgin (Grade II), Eversholt Street	The significance of the church is derived from being a good example of early 19th century Gothic Revival church designed by Genry William Inwood and built between 1824 and 1827. The existing site contributes little to its significance. However, the height and massing ensures the existing development does not dominate the setting of the listed budling.	In the modelling, massing has been stepped back to minimise the effect on the townscape of Eversholt Street and the Grade II listed Church of St Mary the Virgin (see key local view 10). The need for stepped back massing has been highlighted in the site allocation supporting text. As the site allocation is on the opposite side of Eversholt Street to the listed building and approximately 90m to the south, the potential for an effect of its setting is lessened and any impact would be limited to oblique views of the church from the north or south. There is the potential for a low level of harm as a result of the increase in massing of the site allocation in comparison to the

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
		existing buildings. This could be mitigated through the use of excellent design and high quality materials.
163-203 Eversholt Street, Eversholt House (Grade II)	The significance of the building is derived from being the London and North-Western Region Railways Clearing House. It dates from 1846-8 with additions northwards in 1850. The site contributes to its significance due to its long association with the railway.	In the modelling, massing has been stepped back to minimise the effect on the townscape of Eversholt Street and the setting of the Grade II listed Eversholt House (see key local view 10). The need for stepped back massing is reflected in the supporting text to Development Principle EAP 1: Euston Station and tracks. The site allocation is more than 90m from Eversholt House and so any impact would be limited to oblique views of this building from the north or south where site allocation EA1 will be visible in the view. The introduction of a larger building within the setting is likely to result in a low level of harm to the setting of the listed building. This could be mitigated through the use of excellent design and high quality materials.
Bloomsbury Conservation Area	The Bloomsbury Conservation Area is of high architectural significance for its cohesive Georgian and early Victorian townscape, defined by planned terraces, formal garden squares, and consistent use of high-quality materials and detailing. Its heritage value is strengthened by the survival of its historic urban layout and the presence of landmark buildings, including the British Museum and significant institutional architecture.	Key local views (1,2,3,4,5,17, N6) have been assessed. Massing in particular from Gordon Square and Bedford Square has been modelled so that any impact is minimised. While the tested massing demonstrates there would be a change to the setting of the conservation area, there would be no impact on the significance of the conservation area. The development is likely to be glimpsed within certain views but towards Euston Road the character of the CA is more fragmented. There is the potential for new development to result in no harm subject to the use of excellent design and high quality materials.
Camden Town Conservation Area	The Camden Town Conservation Area comprises two distinct but complementary characters: a lively, intensely urban commercial core centred on Camden High Street and Britannia Junction, and a quieter, more formal residential area beyond. Its significance lies in the rich variety of	The local views assessment tested 3 views from locations in the Camden Town Conservation Area. The assessment found that taller buildings in location B in this site allocation have the potential to affect the view from Camden High Street / Camden Town Underground Station to Euston Station (Brittania Junction) (local view 14). In this view, the tested massing envelope of the site allocation is prominent above the roofline of Camden High Street but only in the

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
	predominantly 19th-century architecture, including Georgian and Victorian terraces, eclectic commercial buildings, landmark public houses, banks, and transport infrastructure that together illustrate Camden's historic growth and vibrancy. The high survival of listed and unlisted historic buildings, consistent street patterns, and ongoing commercial use give the area strong architectural, historic, and communal value.	upper range of capacity tested. The introduction of a taller building in this location marks a change in the character of the Camden Town CA and has the potential to result in a low-medium level of harm due to the juxtaposition in building heights. It would be possible to minimise the impact with the use of excellent design and high quality materials.
Fitzroy Square Conservation Area	Fitzroy Square Conservation Area is a distinctive and consistent area of late 18th and early 19th century speculative development. Owing to the relatively short period of its development, the area generally retains a homogenous character. It is an excellent example of Georgian town planning which combined dwellings with ancillary uses and services. The buildings varied in size and status, with the grandest overlooking the central formal, landscaped square, and the humblest located within the rear mews areas.	The local views assessment includes a view from Fitzroy Square to Euston. The tested massing envelope for the site allocation is only just visible and screening would be provided in summer by existing foliage. Development proposals would need to consider potential impacts on the setting of these heritage assets. The Euston Tower redevelopment (which has planning permission) would be prominent above the Grade I listed terrace, particularly in the winter view. There is the potential for the site allocation to result in no harm.
Regents Park Conservation Area	The Regent's Park Conservation Area covers the eastern segment of John Nash's early 19th century Regent's Park development. It is a small part of a greater scheme that extends to the west into the City of Westminster, and comprises a unique planned composition of landscape and buildings, at once classical and picturesque.	The local views assessment tested 13 views from a variety of locations in the Regent's Park Conservation Area. The eastern part of the conservation area (east of the Broad Walk) falls within the London borough of Camden and the western part falls within the City of Westminster. Key local views towards the site from Regent's Park (19, 20, 21, 22, 23, 24, 25, 26, 27, 28, N1 and N2) have been assessed. The local views assessment also tested the view towards Euston from Park Village East adjacent to the Grade I listed villas (view 12).

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
	The significance of the Regent's Park area is of national and international importance. The comprehensive masterplanning of the park, terraces, villas and the (largely redeveloped, but still appreciable in plan form) working market and service area served by canal to the east was on an unprecedented scale of urban design in London. The integration of all elements of a living area, from aristocrat to worker, from decorative to utilitarian, in a single coherent scheme were exhibited here. The open space of the Park gives a sense of being in the country. The space is encircled by the palace-fronted terraces and punctuated by spires. The conservation area statement sets out key views in the conservation area which include views which emphasize the relationship of city to green space: 'Chester Terrace from Chester Road and from Chester Place' and 'From the Park to the Terraces seeing a clear roofline (without buildings in the background)'. The key views also includes the view towards St Katharine's, the Danish Church, with its spires and precinct.	Massing in the view from the lawn between the Broad Walk and the Outer Circle in Regent's Park (see new views N1 and N2) has been modelled so as not to affect the character and appearance of the conservation area or the setting of the Cumberland Terrace (see Cumberland Terrace above). Likewise, massing has been modelled in views 23 and 24 to minimise the effect on the character and appearance of the conservation area and the setting of the Chester Terrace (see Chester Terrace above). The local views assessment shows that taller buildings in location A and location B in site allocation EA1 as well as taller buildings in site allocations EA2 (Royal Mail), EA6 (Cutting at Park Village East), EA9 (Maria Fidelis), EA10 (Regent's Park Estate North) and EA11(Capital City College) have the potential to impact key conservation area views which emphasise the relationship of the city (i.e. the Park's terraces) to green space including views of Chester Terrace and views from the Park to the Grade I terraces seeing a clear roofline without buildings in the background. The effect of tall buildings in these site allocations on the views from the Park to the terraces is shown to be reduced when these sites deliver their minimum tested capacity. In the longer views from the Broad Walk, tree cover even in winter has been shown to impede the view of the listed terraces such that tall buildings in these views would have less effect. It is also noted that there are already isolated locations where existing tall buildings are visible in views from the Park to the Grade I listed terraces. Additional buildings visible above the terraces will result in a degree of harm. Tall buildings at the lower end of the indicative height range have the potential to result in a medium level of harm. Tall buildings at the upper end of the indicative height range have the potential to result in a medium level of harm. The local views assessment shows that taller buildings both in location B in site allocation EA1 and in site allocation EA9 (Maria

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
		Fidelis) and EA10 (Regent's Park Estate North) have the potential to affect the view of the Grade II* St Katharine's Church and its spires in views across Regent's Park from the Broad Walk (view 20, looking south east towards Euston Station), a key view within the Regent's Park Conservation Area. More recent photography demonstrates that tree cover, even in winter, would limit the visibility of development to the south-east. Such development has the potential to result in a low level of harm. In discussion with HE, modifications are proposed to the design chapter (including parts D and E of 'Strategic Principle EAP 2: Design') which strengthen references to NPPF, London and Local Plan policies, seeking to highlight the need to avoid/ and or minimise harm to the significance of heritage assets and their settings.
Regent's Park (Grade I Registered Park)	Regents Park is significant due to its high aesthetic and design value combining picturesque parkland, formal gardens, water features and carefully planned vistas framed by surrounding architecture.	See Regent's Park Conservation Area above for the views assessment (all the views assessed above, with the exception of view 12, are from within the Grade I Registered Park).
Primrose Hill (Grade II Registered Park)	Primrose Hill's significance is derived from being a mid-19th century public park opened in 1842 and adds to the wider Regent's Park landscape.	See assessment of St Paul's Cathedral and LVMF view 4A.1 Primrose Hill: the summit - looking toward St Paul's Cathedral (above).

EA2: ROYAL MAIL

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
St Paul's Cathedral (Grade I)	St Paul's was designed by Christopher Wren and completed in 1710 and is one of the finest examples of English Baroque architecture. Its iconic dome remains a feature of London's skyline and is protected in a number of LVMF views.	The LVMF Strategic views assessment set out in the Background Report has helped to identify those site allocations which have the potential for the greatest effect on strategic views. A tall building in this site allocation is likely to be visible in view 4A.1. (Primrose Hill to St Paul's Cathedral) if the site delivers its maximum tested capacity. However, it would be beyond the wider setting consultation area and

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
	The site does not contribute to the significance of St Paul's.	the tested massing is not considered to detract from the panorama The LVMF Strategic views assessment has shown that the tested massing for tall buildings in this site allocation would not affect other strategic views towards St Paul's Cathedral.
Church of St Mary the Virgin (Grade II)	The significance of the church is derived from being a good example of early 19th century Gothic Revival church designed by Henry William Inwood and built between 1824 and 1827. The existing site contributes little to its significance. However, the height and massing ensures the existing development does not dominate the setting of the listed budling.	In the modelling, massing has been stepped back to minimise the effect on the townscape of Eversholt Street and the Grade II listed Church of St Mary the Virgin (see key local view 10). The need for stepped back massing has been highlighted in the site allocation supporting text. As the site allocation is on the opposite side of Eversholt Street to the listed building and approximately 90m to the south, the potential for an effect of its setting is lessened and any impact would be limited to oblique views of the church from the north or south. There is the potential for a low level of harm as a result of the increase in massing of the site allocation in comparison to the existing buildings. This could be mitigated through the use of excellent design and high quality materials.
163-203 Eversholt Street, Eversholt House (Grade II)	The significance of the building is derived from the historic interest being the London and North-Western Region Railways Clearing House. It dates from 1846-8 with additions northwards in 1850. The existing site contributes little to its significance as it is the relationship with the railway where the strongest link lies.	Tested massing has been stepped back to minimise the effect on the townscape of Eversholt Street and the setting of the Grade II listed Eversholt House (see key local view 10). The site allocation is on the opposite side of Barnby Street and so any effect would be limited to oblique views of this building from the north or south where site allocation EA2 will be visible in the view. While there would be a change to the setting, there would be little to no change to the heritage significance of this building or to the ability to appreciate that heritage significance as a result of development of this scale.
Chester Terrace, Regent's Park (Grade I)	The terrace was originally conceived by John Nash and constructed in 1825 by James Burton, circa 1825. It forms a grand palace-style terrace of 27 houses and 5 semi-detached houses and is one of the longest unbroken facades in Regent's Park. The site is currently not visible from any locations and	The local views assessment shows that taller buildings in this site allocation have the potential to affect the setting of Grade I Regent's Park and Grade I Chester Terrace from the Inner Circle/Chester Road view (local view 24). The massing has been developed in a range of heights and massing (upper and lower range) showing the possibility for minimising effects on the heritage asset. The minimum option

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
	does not contribute to the significance of the terraces.	shows how the development of different typologies (low deep massing) minimises effects. The EAP provides a broad indicative range for taller building heights in location B (40-60m) in which this site allocation falls. Development at the lower end of the range would minimise the effect on Chester Terrace (approx. 45m) such that development at this lower end has the potential to result in no harm. Tall buildings at the upper end of the indicative height range have the potential to result in a medium level of harm. In discussion with HE, modifications are proposed to the design chapter (including parts D and E of 'Strategic Principle EAP 2: Design') which strengthen references to NPPF, London and Local Plan policies, seeking to highlight the need to avoid/ and or minimise harm to the significance of heritage assets and their settings. Noting that proposals resulting in harm will require clear and convincing justification, and will be considered in accordance with National, London and Local Plan policies.
Regent's Park Conservation Area	The Regent's Park Conservation Area covers the eastern segment of John Nash's early 19th century Regent's Park development. It is a small part of a greater scheme that extends to the west into the City of Westminster, and comprises a unique planned composition of landscape and buildings, at once classical and picturesque. The significance of the Regent's Park area is of national and international importance. The comprehensive masterplanning of the park, terraces, villas and the (largely redeveloped, but still appreciable in plan form) working	The local views assessment shows that taller buildings in location B in site allocation EA2 (Royal Mail) have the potential to affect a key conservation area view which emphasizes the relationship of the city to green space: the view of Chester Terrace from Chester Road. Two points on Chester Road have been tested. From Chester Road / Broad Walk junction (local view 23), the massing envelope of the site allocation is not visible above Chester Terrace in either the lower or upper range of capacity tested. From Chester Road / Inner Circle junction) (local view 24), the massing envelope of the site allocation is only visible above Chester Terrace in the upper range of capacity tested. This demonstrates how low deep massing (rather than a slim tower) minimises effects. It is also noted that Brill Tower is already visible above Chester Terrace and is a prominent feature in this view. Brill Tower was approved and constructed after the Regent's Park

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
	market and service area served by canal to the east was on an unprecedented scale of urban design in London. The integration of all elements of a living area, from aristocrat to worker, from decorative to utilitarian, in a single coherent scheme were exhibited here. The conservation area statement sets out key views in the conservation area which include views which emphasize the relationship of city to green space: 'Chester Terrace from Chester Road and from Chester Place' and 'From the Park to the Terraces seeing a clear roofline (without buildings in the background)'.	Conservation Area Appraisal and Management Strategy was adopted in 2011 and so the assessment of key views in this document has not considered subsequent changes in the townscape visible beyond the listed terraces in Regent's Park and changes to the Chester Terrace view from Chester Road. Development at the lower end of the indicative height range should not be visible above the roofline of Chester Terrace and so result in no harm. Tall buildings at the upper end of the indicative height range have the potential to result in a medium level of harm.
Regent's Park (Grade I Registered Park)	Regents Park is significant due to its high aesthetic and design value combining Picturesque parkland, formal gardens, water features and carefully planned vistas framed by surrounding architecture.	See Regent's Park Conservation Area above.
Primrose Hill (Grade II Registered Park)	Primrose Hill's significance is derived from being a mid-19th century public park opened in 1842 and adds to the wider Regent's Park landscape.	See assessment of St Paul's Cathedral and LVMF view 4A.1 Primrose Hill: the summit - looking toward St Paul's Cathedral (above).
Camden Town Conservation Area	The Camden Town Conservation Area comprises two distinct but complementary characters: a lively, intensely urban commercial core centred on Camden High Street and Britannia Junction, and a quieter, more formal residential area beyond. Its significance lies in the rich variety of predominantly 19th-century architecture, including Georgian and Victorian terraces, eclectic commercial buildings, landmark public houses, banks, and transport infrastructure	The local views assessment tested 3 views from locations in the Camden Town Conservation Area. The assessment found that taller buildings in location B in site allocation EA2 (Royal Mail) have the potential to affect the view from Camden High Street / Camden Town Underground Station to Euston Station (Brittania Junction) (local view 14). In this view, the tested massing envelope of the site allocation is prominent above the roofline of Camden High Street only in the upper range of capacity tested. There is the potential for a low-medium level of harm within this view as a result of the juxtaposition of building heights visible above the rooflines. It would be possible to minimise

Heritage Asset	Significance and Current Site Conditions	Potential Harm, Mitigations and Enhancement Opportunities
	that together illustrate Camden's historic growth and vibrancy. The high survival of listed and unlisted historic buildings, consistent street patterns, and ongoing commercial use give the area strong architectural, historic, and communal value. The conservation area appraisal sets out key views and approaches. Those relevant to the EAP are set out below. Formal vistas in the Conservation Area include the curve of Mornington Crescent; Views out of the Conservation Area include: views south along Camden High Street from raised ground north of junction with Delancey Street, with views of Koko (former Camden Palace) and the Crowndale Centre, and upper storeys of Greater London House above roofline of Camden High Street; and panoramic views from west end of Delancey Street and length of Mornington Terrace across railway cutting to south: housing blocks of the Regent's Park Estate in foreground, with West End skyline including Euston Tower and BT Tower in background.	the impact with the use of excellent design and high quality materials.

EA3: THE PLACE & PREMIER INN

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
17 Duke's Road (The Place) (Grade II)	The significance of the building is derived from being a good example of a well preserved urban late-Victorian drill hall. It features robust brickwork with Queen Anne style project central bay. The existing site does not contribute to the significance of the listed building. The Place, a contemporary dance educational trust, which is part of the site allocation, uses the former drill hall as a theatre.	The listed building is adjacent to the 10 storey Premier Inn / Somerton House, which is part of the site allocation. The existing tall building is set back from No.17 and the established building line of Duke's Road. The tested massing has been developed to align with the established building line of No. 17 and the buildings to the south of Duke's Road. Along Flaxman Terrace, the height has been progressively reduced through capacity testing to improve its relationship with the listed building. While the contrast in height between a taller building on the northern part of the site allocation and the listed building is part of the established setting, any future realignment of the building line will need to be sensitive to the setting of the listed building. There is the potential for a low level of harm as a result of the increased proximity and massing adjacent to the listed building. This could be mitigated through the use of excellent design and high quality materials. The site allocation development and design principles include a requirement for development proposals to retain the Grade II listed 17 Duke's Road, ensuring that its fabric and setting are protected and, where appropriate, enhanced to better reveal its heritage significance, and to establish an appropriate and viable use to ensure the building's long-term future.
Church of St Pancras (Grade I)	The church is an excellent example of Greek revival architecture designed by H and H.W Inwood. The church dates from 1819-22 and is constructed of Portland stone with stone coloured terracotta detailing.	The site allocation includes an existing 10 storey building facing Duke's Road which is set back from the established building line of Duke's Road and faces towards the listed church. The tested massing has been developed to align with the established building line of Duke's Road. While the contrast in height between a taller building on the northern part of the site allocation and the Grade

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	The site currently detracts from the significance of the listed building as a result of the height and architectural approach. However, the building does not compete with the tallest point of the church.	I listed church is part of the established setting, any future realignment of the building line will need to be sensitive to the setting of the listed building and take opportunities to improve the setting of the church. The site allocation's development and design principles include guidance that development should not harm the setting of the Grade I listed Church, with particular attention paid to the backdrop of the portico and tower in views from the west. Future mitigations could include modulated building massing and exceptional design. Stepping heights down, complimenting materiality and a high quality architectural response would help to improve the setting of the listed building. There is the potential for no harm subject to a final design solution that seeks to improve the materiality and relationship with the Grade I listed church.
Elizabeth Garrett Anderson Hospital, Euston Road (Grade II)	The significance of the hospital is derived from being the first purpose-built hospital devoted to women doctors, treating female patients. They have been somewhat altered externally and internally with the frontage block on Euston Road now being of particular interest as it is architecturally the most impressive surviving part, and because it originally contained the Women's Medical Institute on the ground floor, with wards on the upper floors. The site does not contribute to the significance of the listed building.	Tested massing includes 10 storeys on Euston Road. It is noted that the site allocation includes an existing 10 storey element which is directly opposite the listed former hospital. Given the existing context of tall buildings and as the site is on the opposite side of Euston Road to the listed building and the separation distance between the building line of the site and the listed building is more than 30m, a taller building adjacent to Euston Road is unlikely to detract from the setting of this listed building. It is noted that a 10 storey building has been developed adjacent to the listed building (Unison, 130 Euston Road). As such, there is the potential for no harm subject to a suitable high quality design response.

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
The Rocket Public House (Grade II)	The significance of the building derives from being a high quality late-Victorian purpose built public house. The site does not contribute to the significance of the listed building.	The 6 storey element of the existing Premier Inn, which is part of the site allocation, is opposite the listed PH on the opposite side of Euston Road. Tested massing includes 10 storeys on Euston Road. The separation distance between the building line of the site and the listed building is more than 30m. Given this context, increase height on the Euston Road frontage of the site allocation is unlikely to harm the setting of this listed building. It is also noted that a 10 storey building has been developed in the same street block as the listed building (Unison, 130 Euston Road) and the 16 storey Pullman hotel is opposite the listed public house on the other side of Chalton Street. As such, there is the potential for no harm subject to a suitable high quality design response.
Flaxman Lodge (Grade II)	Pair of semi-detached houses designed to appear as one lodge (circa 1907-8) by Joseph and Smitham for St Pancras Vestry. The significance of this building derives from its architectural value. It is identified in the Bloomsbury conservation appraisal as a local landmark, its red brick and render, copper cupolas and circular bays providing variety in the streetscape. The site does not contribute to the significance of the listed building.	The site allocations tested massing height has been adjusted on Flaxman Terrace to create a better relationship with nearby buildings including the listed 2 storey Flaxman Lodge (with raised ground floor) which is adjacent to the 6 storey Flaxman Court. Recognising the lower context on Flaxman Terrace to the south of the site, the site allocation provides an indicative height of around 20m (42m AOD) above ground level. As such, there is the potential for a low level of harm as a result of the additional height which could detract from the low height of the existing building. This could be mitigated through careful design with stepped back massing and high quality materials.
Bloomsbury Conservation Area	The Bloomsbury Conservation Area is of high architectural significance for its cohesive Georgian and early Victorian townscape, defined by planned terraces, formal garden squares, and consistent use of high-quality materials and detailing. Its heritage value is strengthened by the survival of its historic urban layout and the presence of landmark	The site allocations tested massing height has been adjusted on Flaxman Terrace to create a better relationship with nearby buildings within the conservation area, as well as with the Grade II listed No. 17 Duke's Road. On Flaxman Terrace to the rear of the site allocation, while Flaxman Lodge is 2 storey (with raised ground floor), Flaxman Court (6 storeys, including a floor of accommodation at roof level) is a more substantial building which is more representative of context height. In this context, a redevelopment of the site with a building that

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	buildings, including the British Museum and significant institutional architecture. The southern part of the site falls within the conservation area and is identified as making a neutral contribution to the conservation area in the conservation area appraisal and management strategy.	responds to the height context of Flaxman Terrace would be appropriate. Recognising the lower context on Flaxman Terrace and the Bloomsbury Conservation Area to the south of the site allocation (as compared with the higher context of Euston Road), the site allocation provides an indicative height of around 20m (42m AOD) above ground level. Redevelopment of this site would result in the loss of two buildings in the Conservation Area both of which have been assessed in the Conservation Area Appraisal as providing a neutral contribution to the Conservation Area. Development of the scale tested is likely to result in a change to the conservation area and its setting. However, there would be no impact on the significance of the Conservation Area. Rather, there is potential for future development to enhance the Conservation Area and its setting with more sympathetic architecture.

EA4: EUSTON CIRCUS BUILDING – 250 EUSTON ROAD

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
Palace of Westminster (Grade I listed and World heritage Site)	Westminster Palace, rebuilt from the year 1840, is a fine example of neo-Gothic architecture. The World Heritage Site – which also comprises the Church of Saint Margaret and Westminster Abbey – is of great historic and symbolic significance. The Palace of Westminster illustrates in colossal form the grandeur of constitutional monarchy and the principle of the bicameral parliamentary system, as envisaged in the 19th century, constructed through English	In relation to the London View Management Framework, part of the site falls within the Landmark Viewing Corridor 2B.1 panorama from Parliament Hill to the Palace of Westminster. The LVMF provides a description of the view: all three towers of the Palace of Westminster are set against the distant hills. The scale and simple outline of existing tall buildings in the view frame the Palace of Westminster and contrast with its more delicate and intricate silhouette of towers. This Protected Vista does not include a Wider Setting consultation area. The site allocation identifies a potential taller building massing positioned to the left of the viewing corridor, as this would be read in

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	architectural references to show the national character. The Palace is one of the most significant monuments of neo-Gothic architecture, as an outstanding, coherent and complete example of neo-Gothic style. The site does not contribute to the significance of the Grade I listed World Heritage Site.	the context of the existing University College Hospital tower, which is of a similar height and already forms part of the backdrop in this view. The LVMF Strategic views assessment set out in the Background Report assesses the impact on this view from the height and massing modelled for this site allocation. It found that the taller massing envelope lies outside the Landmark Viewing Corridor and sits in front of the University College Hospital tower. The lower massing envelope would be set below the Landmark Viewing Corridor threshold so as not to harm the view to the Palace of Westminster. Following consultation responses, proposed modifications to this site allocation include a reduction in the indicative height of a tall building to allow for a better transition between UCLH, The Euston Square hotel and 250 Euston Road and the residential and listed properties nearby (see entry below). Subject to excellent design, the proposed massing has the potential to preserve the wider setting of the Palace of Westminster and result in no harm.
168 and 170 North Gower Street and 185 –191 North Gower Street	The significance of the buildings is derived from the group value of being well-preserved early 19th century Georgian townhouses. They make a valuable contribution to the historic streetscape and are illustrative of the pattern of Georgian urban development in North London. The site does not contribute to the significance of the buildings.	The site lies adjacent to the Grade II listed terraces at 185–191 North Gower Street and there is also a Grade II listed terrace on the opposite side of North Gower Street (Nos. 168-170). The proposed massing broadly follows the established building height, with the exception of a taller element located at the corner of Euston Road and North Gower Street. This increase in height (a tower 75m high) was considered appropriate within its context, responding to the presence of taller buildings along Euston Road, including Euston Tower and the University College Hospital tower. It was recognised that there was potential for the increased height to affect the setting of the listed terraces.

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
		Height and massing in this location is likely to affect the views from the north including North Gower Street heritage assets. Any future development will be visible at the end of North Gower Street. The University College Hospital tower (75m), the Wellcome building (44m) and the mirrored façade of the existing building on this site (25m) are already prominent in this view. Subject to a detailed design, the proposals have the potential to preserve the setting of the listed buildings resulting in no harm. Following the comments received during the Regulation 19 consultation, officers have reviewed this site allocation and while it is considered that the final appropriate height will be the product of detailed design within the development management process, additional testing suggests that a residential building of approx. 53m may be more appropriate in this location. A building of this height would respond better to the indicative height of site allocation EA5 'Euston Square Hotel' as well as the lower context to the north. The site allocation highlights that development must be designed to respect the nearby listed buildings. Potential effects on these heritage assets, as well as on the wider townscape to the north, are expected to be minimised through a carefully modulated massing design. This includes stepping down building heights towards the listed terraces and delivering an excellent quality architectural response. While the wider setting of these listed buildings has continually evolved, the consistent historic townscape of the street will continue to be read. While there would be a change to the setting, there would be no change to the heritage significance of these listed buildings, or to the ability to appreciate that heritage significance, as a result of development of this scale.
Bloomsbury Conservation Area	The Bloomsbury Conservation Area is of high architectural significance for its cohesive	The site is located outside the conservation area which is located to the east and to the south. The closest part of the conservation area is

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	Georgian and early Victorian townscape, defined by planned terraces, formal garden squares, and consistent use of high-quality materials and detailing. Its heritage value is strengthened by the survival of its historic urban layout and the presence of landmark buildings, including the British Museum and significant institutional architecture. The site does not contribute to the significance of the Conservation Area.	on the opposite side of Euston Road to the south east of the site allocation. The local views assessment includes the view from Bedford Square looking north on Gower Street towards Euston (new view 6). This view is towards the site allocation. Bedford Square is a grade II* registered garden, with Grade I listed townhouses fronting the square. The tower of University College Hospital is visible in this view and the tested massing of a tall building on this site allocation would be just visible. Given the limited visibility, there is potential for development of this site allocation to sit comfortably within the setting of the Conservation Area and to result in no harm. Development proposals will need to consider any potential effects on the setting of the Bloomsbury Conservation Area and testing of additional local views would be expected.
Fitzroy Square Conservation Area	Fitzroy Square Conservation Area is a distinctive and consistent area of late 18th and early 19th century speculative development. Owing to the relatively short period of its development, the area generally retains a homogenous character. It is an excellent example of Georgian town planning which combined dwellings with ancillary uses and services. The buildings varied in size and status, with the grandest overlooking the central formal, landscaped square, and the humblest located within the rear mews areas. The site does not contribute to the significance of the Conservation Area.	The local views assessment includes a view from Fitzroy Square to Euston. The tested massing envelope for the site allocation is only just visible, and screening would be provided in summer by existing foliage. Given the limited visibility, there is potential for development of this site allocation to sit comfortably within the setting of the Conservation Area and to result in no harm. Nevertheless, development proposals would need to consider potential effects on the setting of these heritage assets. It is noted that the Euston Tower redevelopment would be prominent above the Grade I listed terrace, particularly in the winter view.

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities

EA5: EUSTON SQUARE HOTEL

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
168 and 170 North Gower Street and 85 –191 North Gower Street	The significance of the buildings is derived from the group value of being well-preserved early 19th century Georgian townhouses. They make a valuable contribution to the historic streetscape and are illustrative of the pattern of Georgian urban development in North London. The site does not contribute to the significance of the buildings.	The capacity model massing for this site allocation was developed to respond to the higher context of Euston Road and the lower context to the north. A taller element was modelled at the corner of Euston Road and North Gower Street, reflecting the established pattern of increased height at key junctions and responding to the presence of the Wellcome Trust Building on Euston Road, and maintaining consistency with the prevailing scale of development in this location. The tested massing was then stepped down towards Stephenson Way (6 storeys), ensuring a more sensitive relationship with the surrounding lower scale context and Grade II listed 168 and 170 terraces and contributing to a coherent transition in building heights. Excellent design including modulated massing and architectural character will need to be developed through the planning application stages. The site allocation provides an indicative height of 40m at the corner of Euston Road and North Gower Street. The indicative height falls below the defined height of a tall building (which is defined as buildings which are over 40 metres in height in the Central Activities Zone). As such, the site is not identified as a location for a taller building. Development on this site allocation is expected to be designed to respect the nearby listed buildings. Additional height and massing in this location is likely to affect the views from the north including North Gower Street heritage assets. Any future development would be visible at the end of North Gower Street. While there would be a change to the setting, there would be no change to the heritage significance of these listed buildings, or to

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
		the ability to appreciate that heritage significance, as a result of development of this scale.
Bloomsbury Conservation Area	The Camden Town Conservation Area comprises two distinct but complementary characters: a lively, intensely urban commercial core centred on Camden High Street and Britannia Junction, and a quieter, more formal residential area beyond. Its significance lies in the rich variety of predominantly 19th-century architecture, including Georgian and Victorian terraces, eclectic commercial buildings, landmark public houses, banks, and transport infrastructure that together illustrate Camden's historic growth and vibrancy. The high survival of listed and unlisted historic buildings, consistent street patterns, and ongoing commercial use give the area strong architectural, historic, and communal value.	The site is located outside the conservation which is located to the east and to the south. The closest part of the conservation area is on the opposite side of Euston Road to the south of the site allocation. The local views assessment includes the view from Bedford Square looking north on Gower Street towards Euston (new view 6). This view is towards the site allocation. Bedford Square is a grade II* registered garden, with Grade I listed townhouses fronting the square. The tower of University College Hospital is visible in this view. The tested massing of this site allocation would be just visible above the 9 storey Wellcome Trust building in the winter view. However, the site allocation includes a lower indicative height (40m) than the height tested in this view and so would be likely to be less visible. In summer, the tested massing was screened by trees on Gower Street. Given the limited visibility, there is potential for development of this site allocation to sit comfortably within the setting of the Conservation Area and to result in no harm. Development proposals will need to consider any potential effects on the setting of the Bloomsbury Conservation Area and testing of additional local views would be expected.
Fitzroy Square Conservation Area	Fitzroy Square Conservation Area is a distinctive and consistent area of late 18th and early 19th century speculative development. Owing to the relatively short period of its development, the area generally retains a homogenous character. It is an excellent example of Georgian town planning which combined dwellings with	The local views assessment includes a view from Fitzroy Square to Euston. The tested massing envelope for the site allocation is not visible in this view. As such, there is no potential for harm.

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	ancillary uses and services. The buildings varied in size and status, with the grandest overlooking the central formal, landscaped square, and the humblest located within the rear mews areas.	

EA6: CUTTING AT PARK VILLAGE EAST

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
2-16, 22-34, 36A and 36B, Park Village East (Grade II* listed)	The significance of these buildings derives from forming part of John Nash's Regent's Park scheme and as an intact group of Regency villas. They exemplify the Picturesque approach to urban resident planning and have considerable group value. The site is separated from these buildings by the Euston railway cutting and a high brick wall. However, views over the brick wall did allow glimpses of the 19th century townscape within Mornington Crescent. The wall is locally listed and the list description includes the following: *running south from no. 1 Park Village East and terminating at Granby Terrace. Dates from c1906, when the railway cutting was widened resulting in the demolition of houses on the east side of Park Village East. The wall is part of a structure which includes a planting area enclosed by a shallow brick wall that greatly*	The northern part of this site allocation is approximately 70m away from the nearest of the Grade II* listed villa (36 Park Village East). The existing context of these buildings when viewed from Park Village East is mainly defined by the locally listed wall of the railway cutting and the planting in front. More recently a hoarding has been erected on Park Village East which includes an image of the wall and planting. The tested massing includes lower height adjacent to Park Village East to respond to the existing context height and increased height set back from Park Village East where the site is adjacent to the railway. This stepped massing has been developed to minimise the effect on the existing townscape, the listed buildings to the north and the Regent's Park Conservation Area. Taller massing has been tested to the north of the site allocation, adjacent to the railway. Tall buildings have the potential to affect the setting of listed buildings on Park Village East (local view 12) due to their hight and scale and the juxtaposition with the Nash villas and the picturesque character of them. Height is clearly set apart from the listed buildings (in the distance, further south and to the other side of the road). Nevertheless, there is the potential for a medium level of harm.

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	enhances the rustic character of the streetscape. The site does not contribute to the significance of the listed buildings.	The site allocation sets out the design principles for tall buildings and that exceptional quality design and shaped massing should be developed to minimise any impact on the setting of the conservation areas and listed buildings.
2-11 Gloucester Gate (Grade I)	The significance of the terrace is derived from forming an integral part of the Regent's Park masterplan and group value of ornate terrace. It is one of the 10 principal Nash terraces encircling the park and dates from 1827. The site does not contribute to the significance of the listed building.	The capacity study tested an upper and lower range of height. The local views assessment showed that the tested massing with 12 storeys did not appear above the rooftop of the Grade I listed terrace when viewed from the north of the Broad Walk (local view 20). However, a taller 16 storey massing envelope would be visible behind Gloucester Gate which results in a degree of harm to the setting of Grade I Regent's Park and the Grade I listed terrace as a result of the backdropping. The development of massing in a range of heights and massing (lower and upper range) shows the possibility for minimising effects on the heritage asset. The site allocation states that "taller buildings of around 12 storeys may be appropriate in some locations". The potential for a building taller than this may be appropriate, but this would need to be tested in local and strategic views. A tall building which is at the upper end of the capacity range tested would have the potential to result in a medium level of harm. Following discussion with HE, the sensitivity of Gloucester Gate terrace will be highlighted in the site allocation with a proposed modification that includes the following: Exceptional quality design and shaped massing should be developed to avoid and/or minimise any impact on the setting of the conservation areas and listed buildings, including the grade I listed 2-11 Gloucester Gate terrace.
Regent's Park Conservation Area	The significance of the Regent's Park area is of national and international importance. The comprehensive masterplanning of the park, terraces, villas and the (largely redeveloped, but still appreciable in plan	The local views assessment tested 13 views from a variety of locations in the Regent's Park Conservation Area. Key local views towards the site from Regent's Park (19, 20, 21, 22, 23, 24, 25, 26, 27, 28, N1 and N2) have been assessed.

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	form) working market and service area served by canal to the east was on an unprecedented scale of urban design in London. The conservation area assessment identifies a number of key views. The key views include views of Chester Terrace from Chester Road and view from the Park to the Listed terraces. The views also include Mornington Street (outside the Conservation Area) to Park Village East. The widening of the railway cutting to Euston resulted in the demolition of the eastern side of Park Village East and a new bridge to Mornington Terrace. The Regent's Park Conservation Area Statement identifies Park Village East as one of the spatial elements that make up the conservation area and describes it as 'picturesque on a domestic suburban scale'. Park Village East along with Park Village West "are picturesque precedents for the small suburban villa, closely set in a variety of styles".	The local views assessment shows that taller buildings in this site allocation have the potential to affect key conservation area views which emphasise the relationship of the city to green space including views of Chester Terrace and views from the Park to the Grade I terraces seeing a clear roofline without buildings in the background (view 20 upper range and view 21 lower and upper range). Various height options have been tested to minimise impact on these listed buildings and the Regents Park Conservation Area. The effect of tall buildings in these site allocations on the views from the Park to the terraces is shown to be reduced when these sites deliver their minimum tested capacity. In the longer views from the Broad Walk, tree cover even in winter has been shown to impede the view of the listed terraces such that tall buildings in these views would have less effect. It is also noted that there are already isolated locations where existing tall buildings are visible in views from the Park to the Grade I listed terraces. However, additional buildings visible from the Park is likely to result in a degree of harm to the setting of the conservation area. Tall buildings at the upper end of the capacity tested have the potential to result in a medium level of harm. Tall buildings in this site allocation also have the potential to affect the setting of the Park Village East sub-area of the conservation area (part of the 'Park Village East and West' character zone) (local view 12) due to their hight and scale and the juxtaposition with the lower context of the conservation area. While potential taller buildings should be sited by the railway tracks and set back from the conservation area, there remains the potential for a low level of harm. Exceptional quality design and shaped massing should be developed to minimise any impact on the setting of the Conservation areas and listed buildings. In discussion with HE, modifications are proposed to the design chapter (including parts D and E of 'Strategic Principle EAP 2:

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
		Design') which strengthen references to NPPF, London and Local Plan policies, seeking to highlight the need to avoid/ and or minimise harm to the significance of heritage assets and their settings and which highlight specific sensitives within the conservation area.
Regent's Park (Grade I Registered Park)	The significance of the Regent's Park area is of national and international importance. The comprehensive masterplanning of the park, terraces, villas and the (largely redeveloped, but still appreciable in plan form) working market and service area served by canal to the east was on an unprecedented scale of urban design in London.	See Regent's Park Conservation Area above for the assessment of impact and mitigation.

EA7: GRANBY TERRACE BRIDGE/ HAMPSTEAD RD

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
'261-263 Hampstead Road', 1 Mornington Crescent and 2-12 Mornington Crescent	The significance of the terrace derives from being part of a planned crescent of Regency townhouses. The site was originally occupied by a terrace which were demolished post-war. It was recently used as a car park and now a temporary HS2 depot. When vacant the site allows views of the crescent to the rear which although not a designed view adds to the interest created here.	The conservation area statement describes the previous use of the site allocation as: "a taxi depot occupies the cleared site south of No 261 Hampstead Road, adjacent to the railway tracks, fronted by a large and out-of-keeping illuminated advertisement hoarding, which overshadows No 261 and causes harm to the setting of the adjacent listed buildings, as well as creating an unsightly southern entrance to the Camden Town Conservation Area". Since c.2019 the site has been used as a construction logistics site for HS2 with stacked Portakabins (4 storeys) sited adjacent to the listed 261 Hampstead Road and facing Hampstead Road. The existing context of the site allocation includes 4 storey listed houses and terrace on the south side of Mornington Crescent, 6 storey Greater London House (23m-25m) on the north side of

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
		Mornington Crescent and the 20 storey residential towers on the Ampthill Estate on the east side of Hampstead Road. Various height options have been tested to minimise impact on these listed buildings and the Camden Town Conservation Area. Height has been reduced to ensure it does not form a cluster of height with the adjacent Ampthill Towers. The local views assessment in the Background Report includes testing of a 12 storey massing envelope for part of this site allocation (new local views N3, N4 and N5). The views assessment shows that development of this height has the potential to have a harmful effect on the setting of the listed buildings as a result of backdropping and undermining the uniformity of the crescent. This is likely to result in a medium level of harm. However, there is scope at the detailed design stage to ensure an appropriate design led architectural response, including through a refined massing composition to avoid this harm. The site allocation sets out that a potential taller building may be appropriate at the corner of Hampstead Rd, **up to** circa 40m (66m AOD), **subject to testing of impacts**. A building that is less than 40m (12 storeys) is likely to have less impact on the setting of the listed terrace. Equally a more refined massing than the massing envelope tested is also likely to have less impact. The site allocation provides an opportunity for redevelopment to provide a more attractive southern entrance to the conservation area than the previous uses of this site. The site allocation text expects development to be designed to respect the sensitive heritage constraints, including the Camden Town Conservation Area, and adjacent listed buildings. 'Development Principle EAP 3: Camden Cutting' states that development proposals should be sensitive to the historic context and seek to preserve and enhance the setting of heritage assets through sensitive design and

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
		scale. The supporting text sets out an expectation that a detailed assessment should demonstrate that a future proposal does not harm, and seeks to make a positive contribution to local views and the immediate context, and the impact on neighbouring listed buildings.
Camden Town Conservation Area	The Camden Town Conservation Area comprises two distinct but complementary characters: a lively, intensely urban commercial core centred on Camden High Street and Britannia Junction, and a quieter, more formal residential area beyond. Its significance lies in the rich variety of predominantly 19th-century architecture, including Georgian and Victorian terraces, eclectic commercial buildings, landmark public houses, banks, and transport infrastructure that together illustrate Camden's historic growth and vibrancy. The high survival of listed and unlisted historic buildings, consistent street patterns, and ongoing commercial use give the area strong architectural, historic, and communal value. The conservation area appraisal sets out key views and approaches. Formal vistas in the conservation area include the curve of Mornington Crescent. Views out of the conservation area include: views south along Camden High Street from raised ground north of junction with Delancey Street, with views of Koko (former	The local views assessment tested 3 views from locations in the Camden Town Conservation Area. The assessment found that this site allocation was visible in two views. In the view from Mornington Terrace / Delancey Street junction to Euston (local view 13), the tested tall building massing is visible terminating this view. In the view looking south from close to the junction of Clarkson Row and Mornington Crescent (new view 3), the tested tall building massing would be prominent behind the listed terrace. The impact has the potential to result in a medium level of harm. It is noted that the greater height of Greater London House, already overshadows the lower height of the listed terrace on Mornington Crescent and the conservation area statement identifies that the street has suffered quite extensively, becoming sandwiched between the railway lines at the rear and the enormous bulk of Greater London House erected on the site of the communal gardens in the 1920s. The site allocation sets out that a potential taller building may be appropriate at the corner of Hampstead Rd, **up to** circa 40m (66m AOD), **subject to testing of impacts**. A building that is less than 40m (12 storeys) is likely to have less impact on the setting of the listed terrace. Equally a more refined massing than the massing envelope tested is also likely to have less impact. The site allocation text expects development to be designed to respect the sensitive heritage constraints, including the Camden Town Conservation Area, and adjacent listed buildings. 'Development Principle EAP 3: Camden Cutting' states that development proposals

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	Camden Palace) and the Crowndale Centre, and upper storeys of Greater London House above roofline of Camden High Street; and panoramic views from west end of Delancey Street and length of Mornington Terrace across railway cutting to south: housing blocks of the Regent's Park Estate in foreground, with West End skyline including Euston Tower and BT Tower in background.	should be sensitive to the historic context and seek to preserve and enhance the setting of heritage assets through sensitive design and scale. The supporting text sets out an expectation that a detailed assessment should demonstrate that a future proposal does not harm, and seeks to make a positive contribution to local views and the immediate context, and the impact on neighbouring listed buildings.

EA8: CUTTING AT MORNINGTON TERRACE

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
Camden Town Conservation Area	Historic grain of the Camden Town Conservation Area and the nearby listed buildings. The area contains a large number of good examples of early/mid 19th century speculatively built terraced London houses, generally of a uniform appearance, and many statutorily listed for their special interest. The conservation area appraisal sets out key views and approaches. Views out of the conservation area include panoramic views from west end of Delancey Street and length of Mornington Terrace across railway cutting to south: housing blocks of the Regent's Park Estate in foreground, with West End skyline including Euston Tower and BT Tower in background.	The local views assessment tested the view from Mornington Terrace / Delancey Street junction to Euston (local view 13). The existing view from this long residential terrace is referred to in the conservation area statement. "Forming the western boundary of the Conservation Area, Mornington Terrace has a spacious quality and benefits from panoramic views to the south and west. This is due to the Euston railway lines which have run alongside since 1851, the widening of which resulted in the demolition of a series of villas on the west side in 1902. A high brick wall with stone copings constructed at this time screens the railway cutting below. At the entrance to the Mornington Street Railway Bridge, the wall is accentuated by a pair of stone piers with lamp standards, which are listed grade II for their special interest." The local views assessment shows that the tested 5 storey massing would result in the loss of the existing views over the railway cutting from this part of the conservation area. To the south of the site

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
		allocation, beyond the junction with Mornington Street bridge, the open aspect over the railway lines would be retained. The redevelopment of the cutting at Mornington Terrace provides an opportunity to remake the west side of Mornington Terrace and restore the two-sided street that would have existed before 1902. The indicative height of the site allocation has been assessed so as to minimise effects on Mornington Terrace listed buildings and the conservation area. (local view 13). A building of up to 5 storeys has the potential to result in a low level of harm to the conservation as a result of reducing the connection to the railway and blocking key views towards Central London.
58 Mornington Terrace (Grade II)	Semi-detached house. Mid C19. Stucco. 2 storeys 2 windows. No 58 Mornington Terrace and The Edinburgh Castle date from the 1840s and are the sole remaining buildings on the west side of Mornington Terrace following the demolition of 13 pairs of semi-detached villas to make way for a widening of the LNWR railway c.1900. The site makes a neutral contribution to the setting of the listed building.	The site allocation is railway sidings which are significantly lower than existing street level. A raised deck would be required to enable future development to be at the level of Mornington Terrace. Height has been assessed so as to minimise effects on Mornington Terrace listed buildings and the conservation area (local view 13). The increased massing has the potential to dominate the smaller scale listed houses. This has the potential to result in a medium level of harm. It should be noted that the capacity massing is only indicative and will evolve at the detailed design stage to ensure an appropriate design led architectural response, including refined massing composition. The site allocation expects future development to be contextual to the historic grain of Camden Town Conservation Area and adjacent / nearby listed buildings. While a development height of up to 5 storeys has been tested, this height is indicative and the precise height in this location should be the subject of a full testing process through detailed masterplanning work and an assessment of impact, site constraints and other factors including sunlight and daylight.

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
Edinboro Castle PH (Grade II)	Public house. Mid C19, restored 1984. Stucco with wooden public house frontage. Three storeys and cellars. Backs on to railway. No 58 Mornington Terrace and The Edinburgh Castle date from the 1840s and are the sole remaining buildings on the west side of Mornington Terrace following the demolition of 13 pairs of semi-detached villas to make way for a widening of the LNWR railway c.1900. The openness of the site contributes to the setting as it ensures a fuller appreciation of the PH.	Height has been assessed so as to minimise effects on Mornington Terrace listed buildings and the conservation area. The tested height and massing (5 storeys) will result in a change in the setting of the listed building and result in a low level of harm as a result of the additional height of the new development. Suitable set backs and appropriate materiality and design has the potential to reduce the level of harm.
26-52, 53 and 54, 55 and 56 Mornington Terrace (Grade II)	The significance of the terraces derives from being a coherent group of well detailed Victorian town houses. The buildings were originally constructed with semi-detached villas opposite but these were demolished to allow for the creation of railway sidings. The site contributes to the setting to a small degree as these houses have had a strong association with the railway.	Height has been assessed so as to minimise effects on Mornington Terrace listed buildings and the conservation area (local view 13). The tested height and massing are appropriate and consistent with that of the adjacent listed buildings. Future development of the site allocation will alter the relationship of the Listed Buildings with the railway. However, as the land was previously occupied by development, the principle of development would be acceptable The proposed massing has the potential to result in a low level of harm as it is larger than the existing listed terrace. The site allocation expects future development to be contextual to the historic grain of Camden Town Conservation Area and adjacent / nearby listed buildings. While a development height of up to 5 storeys has been tested, this height is indicative and the precise height in this location should be the subject of a full testing process

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
		through detailed masterplanning work and an assessment of impact, site constraints and other factors including daylight and sunlight.
Stone Piers to east end of Mornington Street Bridge (Grade II)	Pair of stone piers with lamp standard s to east end of Mornington Street Railway Bridge. The site does not impact the significance of the bridge.	The stone piers appear to be contemporary with the bridge and thus the introduction of new development will result in a change in the way the settings are experienced. The introduction of buildings where there was open space previously has the potential to result in a medium level of harm. The site allocation sets out that development must be designed to respect the locally listed Mornington Street Bridge including its Grade II listed stone piers. As such, care should be taken to ensure that any new development is set back from the piers.
Wall to east side of railway cutting running the extent of Mornington Terrace and Clarkson Way (locally listed)	Early 20th century wall forming the eastern boundary to the railway cutting, terminating at northern end to an associated building. The northern end is on the site of former railway carriage sheds which themselves replaced earlier villas on this site. The walls are historically significant in relation to the development of the London to Midland Railway and the great impact this had on the appearance and social character of this part of Camden.	Development of the site allocation would require the demolition of a section of the railway cutting wall, from the northern end to Mornington Street bridge (approx. 180m). Approximately 350m of railway cutting wall would remain. The loss of the wall is assessed as resulting in a medium level of harm. The supporting text to 'Development Principle EAP 3: Camden Cutting' acknowledges the significance of the railway cutting walls and expects that remaining sections of the railway cutting walls and parapets should be retained and incorporated into the design of new development where possible, provided this contributes to place making. In accordance with the NPPF, where a development proposal would result in the loss of the whole or part of a heritage asset, the applicant should record and advance understanding of the significance of the asset to be lost in a manner proportionate to its importance and the potential impact upon it; and should make this evidence (and any archive generated) publicly accessible by depositing it in the relevant Historic Environment Record, and any archives with a local museum or other public depository.

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities

EA9: FORMER MARIA FIDELIS SCHOOL

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
St Paul's Cathedral (Grade I)	St Paul's was designed by Christopher Wren and completed in 1710 and is one of the finest examples of English Baroque architecture. Its iconic dome remains a feature of London's skyline and is protected in a number of LVMF views. The site does not contribute to the significance of St Paul's.	The LVMF Strategic views assessment set out in the Background Report identifies those site allocations which have the potential to affect strategic views. The tested massing has been developed with a range of heights and massing. While a lower massing would be visible in view 4A.1. (Primrose Hill to St Paul's Cathedral), a taller massing inevitably would be more visible in this view. However, it would be located beyond the wider setting consultation area and the tested massing is not considered to detract from this panorama or the setting of St Paul's as a Grade I listed building.
Palace of Westminster (Grade I listed and World heritage Site)	Westminster Palace, rebuilt from the year 1840, is a fine example of neo-Gothic architecture. The World Heritage Site – which also comprises the Church of Saint Margaret and Westminster Abbey – is of great historic and symbolic significance. The Palace of Westminster illustrates in colossal form the grandeur of constitutional monarchy and the principle of the bicameral parliamentary system, as envisaged in the 19th century, constructed through English architectural references to show the national character.	The LVMF Strategic views assessment set out in the Background Report identifies those site allocations which have the potential to affect strategic views. The massing has been developed in a range of heights and massing. While a lower massing would be visible in view 2B.1 Parliament Hill - East of the Summit, a taller massing inevitably would be more visible in this view. However, the tested massing sits outside the viewing corridor and is not considered to detract from this panorama or the setting of the Palace of Westminster.

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	The Palace is one of the most significant monuments of neo-Gothic architecture, as an outstanding, coherent and complete example of neo-Gothic style. The site does not contribute to the significance of the Grade I listed World Heritage Site.	
Chester Terrace, Regent's Park (Grade I)	The terrace was originally conceived by John Nash and constructed in 1825 by James Burton, circa 1825. It forms a grand palace-style terrace of 27 houses and 5 semi-detached houses and is one of the longest unbroken facades in Regent's Park. The site is currently not visible from any locations and does not contribute to the significance of the terraces. The site allocation does not contribute to the significance of the listed building.	The local views assessment shows that taller buildings in this site allocation have the potential to affect the setting of the Grade I Regent's Park and the Grade I Chester Terrace (local views 22, 23 and 24). The massing has been developed in a range of heights (upper and lower range) showing the possibility for minimising effects on the heritage assets. The lower height tested having significantly less visibility in these views. More recent photography demonstrates that tree cover, even in winter, would impede the visibility of this site allocation such that massing of the scale tested (upper and lower range) would be more limited in local views 23 and 24. View 22 (from the Broad Walk towards Chester Terrace) has significantly less tree cover and, as a result, Chester Terrace is more visible in winter. A tall building at the lower end of the tested capacity range has the potential to result in a low-medium level of harm. A tall building at the upper end of the tested capacity range has the potential to result in a medium level of harm through the introduction of a city scale building over the top of the Grade I listed terrace. The capacity massing is only indicative and will evolve at the detailed design stage to ensure an appropriate design led architectural response, including refined massing composition. In discussion with HE, modifications are proposed to the design chapter (including parts D and E of 'Strategic Principle EAP 2: Design') which strengthen references to NPPF, London and Local Plan policies, seeking to highlight the need to avoid/ and or minimise harm to the significance of heritage assets and their settings. Noting

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
		that proposals resulting in harm will require clear and convincing justification, and will be considered in accordance with National, London and Local Plan policies.
Cumberland Terrace, Regent's Park	The significance of the terrace is derived from being an excellent example of a complete Regency Terrace associated with Regents Park and designed by John Nash. The site allocation does not contribute to the significance of the listed building.	The local views assessment shows that taller buildings in this site allocation have the potential to affect the setting of the Grade I Regent's Park and the Grade I Cumberland Terrace (local views 20 and 21). The massing has been developed in a range of heights (upper and lower range) showing the possibility for minimising effects on the heritage asset. The lower height tested having less significantly less visibility in these views. More recent photography demonstrates that tree cover, even in winter, would impede the visibility of Cumberland Terrace in tested views from the Broad Walk looking south-east towards Euston (views 20 and 21). Providing that future development remains hidden there is potential for there to be no harm to the significance of Cumberland Terrace from development at the upper range of tested capacity.
St. Katharine's Danish Church, (Grade II*)	St Katharine's College Chapel, now the Danish Lutheran Church in London. 1826-1828. By Ambrose Poynter. For the Royal Hospital of St Katharine. Restored 1969. The view 'towards St Katharine's, the Danish Church, with its spires and precinct' is identified as one of the key views in the Regent's Park Conservation Area appraisal. The street skyline is punctuated by the brick and stone churches and spires of St Katharine's Danish Church which is	The local views assessment shows that taller buildings in this site allocation have the potential to affect the setting of the Grade I Regent's Park and the Grade II* St. Katharine's Danish Church (local view 20). The massing has been developed in a range of heights (upper and lower range) showing the possibility for minimising effects on the heritage assets. The lower height tested having significantly less visibility in these views with the potential for no harm to the significance of the listed church. A tall building at the upper end of the tested capacity range has the potential to result in a low-medium level of harm

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	currently set with trees and planting with a background of clear sky.	The capacity massing is only indicative and will evolve at the detailed design stage to ensure an appropriate design led architectural response, including refined massing composition. Following discussion with HE, the sensitivity of the listed church will be highlighted in the site allocation with a proposed modification that includes the following: 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. Further views testing will be required for future development proposals to identify whether there are further viewpoint locations (beyond view 20) that should be considered to understand the extent of any impacts.
Regent's Park Conservation Area	The Regent's Park Conservation Area covers the eastern segment of John Nash's early 19th century Regent's Park development. It is a small part of a greater scheme that extends to the west into the City of Westminster, and comprises a unique planned composition of landscape and buildings, at once classical and picturesque. The significance of the Regent's Park area is of national and international importance. The comprehensive masterplanning of the park, terraces, villas and the (largely redeveloped, but still appreciable in plan form) working market and service area served by canal to the east was on an	The local views assessment tested 13 views from a variety of locations in the Regent's Park Conservation Area. Key local views towards the site from Regent's Park (19, 20, 21, 22, 23, 24, 25, 26, 27, 28, N1 and N2) have been assessed. The local views assessment shows that taller buildings in this site allocation have the potential to affect key conservation area views which emphasize the relationship of the city to green space including views of Chester Terrace, St Katharine's Church and views from the park to the Grade I terraces seeing a clear roofline without buildings in the background (views 20, 23, 24 and 25 upper range and views 21 and 22 lower and upper range). The effect of tall buildings in this site allocation on the views from the park to the terraces is shown to be reduced when this site delivers the lower range of tested capacity. While there are already isolated locations where existing tall buildings are visible in views from the Park to the Grade I listed terraces, there are also areas of the park, particularly to the north where no tall

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	unprecedented scale of urban design in London. The integration of all elements of a living area, from aristocrat to worker, from decorative to utilitarian, in a single coherent scheme were exhibited here. The conservation area statement sets out key views in the conservation area which include views which emphasize the relationship of city to green space: 'From the Park to the Terraces seeing a clear roofline (without buildings in the background)'. The view 'towards St Katharine's, the Danish Church, with its spires and precinct' is identified as one of the key views in the Regent's Park Conservation Area appraisal.	buildings are currently visible. Additional development visible from the Park has the potential to result in a degree of harm to the setting of the conservation area. This is assessed to be at the medium level for the upper end of the tested capacity range and to be low level for the lower range of capacity. Figure 3.4 of the EAP Update shows that this site is in Indicative location A for taller buildings (40-90m) hidden behind dome. The site allocation sets out the that a potential taller building could be located in the shadow of St Paul's Cathedral, **up to** 90m (115m AOD) **subject to testing**. A building with a height at the lower end of the range is likely to have less effect on the setting of The Regent's Park and the listed terraces. In discussion with HE, modifications are proposed to the design chapter (including parts D and E of 'Strategic Principle EAP 2: Design') which strengthen references to NPPF, London and Local Plan policies, seeking to highlight the need to avoid/ and or minimise harm to the significance of heritage assets and their settings and which highlight specific sensitives within the conservation area.
Regent's Park (Grade I Registered Park)	Regents Park is significant due to its high aesthetic and design value combining Picturesque parkland, formal gardens, water features and carefully planned vistas framed by surrounding architecture.	See Regent's Park Conservation Area above.

EA10: REGENT'S PARK ESTATE NORTH

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
St Paul's Cathedral (Grade I)	St Paul's was designed by Christopher Wren and completed in 1710 and is one of the finest examples of English Baroque	The LVMF Strategic views assessment set out in the Background Report identifies those site allocations which have the potential to affect strategic views. A tall building in this site allocation is likely to

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	architecture. Its iconic dome remains a feature of London's skyline and is protected in a number of LVMF views. The site does not contribute to the significance of St Paul's.	be visible in view 4A.1. (Primrose Hill to St Paul's Cathedral). The tested massing encroaches into the wider setting consultation area. The effect is significantly reduced when the site delivers the lower range of the tested capacity. Development delivering the lower level of capacity does not appear to harm the panorama or the ability to recognise and appreciate St Paul's Cathedral. The tested massing was developed to contribute to a gradual transition in building heights, supporting the objective of stepping up development away from St Paul's Cathedral. Development at the upper end of the tested capacity range helps to frame the view of St Paul's, much like the now demolished One Euston Square once did. However, the extent of upper range massing within the foreground potentially changes the urban texture currently surrounding St Paul's. As such there could be a low level of harm from the upper range. While development heights and massing in the wider setting consultation area and in the wider panorama has the potential to affect this view, when this site delivers the upper range of tested capacity, the capacity massing is only indicative and will evolve at the detailed design stage to ensure an appropriate design led architectural response, including refined massing composition. The impact of future development in this view could be mitigated by having variation in heights and shaped massing and by the avoidance of massing and height which causes canyon effects. Modifications are proposed which reiterate this point in the EAP Update. The site allocation will also have the following addition: 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.

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
Chester Terrace, Regent's Park (Grade I)	The terrace was originally conceived by John Nash and constructed in 1825 by James Burton, circa 1825. It forms a grand palace-style terrace of 27 houses and 5 semi-detached houses and is one of the longest unbroken facades in Regent's Park. The site is currently not visible from any locations and does not contribute to the significance of the terraces. The site allocation does not contribute to the significance of the listed terrace.	The local views assessment shows that taller buildings in this site allocation have the potential to affect the setting of the Grade I Regent's Park and the Grade I Chester Terrace (local views 22, 23 and 24). The massing has been developed in a range of massing and heights (upper and lower range) showing the possibility for minimising effects on the heritage assets. A tall building at both the lower and upper end of the tested capacity range for this site has the potential to result in a low-medium level of harm as the buildings would be visible over the unbroken skyline behind the Grade I listed buildings. It is noted that within certain summer and winter views the buildings would remain hidden, but from others would remain visible. In discussion with HE, modifications are proposed to parts D and E of 'Strategic Principle EAP 2: Design' to emphasize that proposals should take account of, and avoid/ and or mitigate harm to the significance of heritage assets and their settings. And that proposals resulting in harm will require clear and convincing justification, and will be considered in accordance with National, London and Local Plan policies.
Cumberland Terrace, Regent's Park	The significance of the terrace is derived from being an excellent example of a complete Regency Terrace associated with Regents Park and designed by John Nash. The site allocation does not contribute to the significance of the listed terrace.	The local views assessment shows that taller buildings in this site allocation have the potential to affect the setting of the Grade I Regent's Park and the Grade I Cumberland Terrace (local views 20, 21, new views 1 and 2). The massing has been developed in a range of massing and heights (upper and lower range) showing the possibility for minimising effects on the heritage assets. More recent photography demonstrates that tree cover, even in winter, would limit the visibility of this site allocation. It is noted that within views from Regents Park there are already isolated locations where tall buildings are visible. Additional visible buildings will result in a degree of harm but will not undermine the composition or the grandeur of the terrace. Tall buildings at the lower end of the indicative height range have the potential to result in no

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
		harm due to the lack of visibility. Tall buildings towards the upper end of the indicative height range have the potential to result in a low level of harm. It should be noted that the capacity massing is only indicative and will evolve at the detailed design stage to ensure an appropriate design led architectural response, including refined massing composition. It is also noted that in closer range views (new view 1 and 2), where the grandeur of the terrace is better appreciated, taller buildings in this site allocation would not be visible.
St. Katharine's Danish Church, (Grade II*)	St Katharine's College Chapel, now the Danish Lutheran Church in London. 1826-1828. By Ambrose Poynter. For the Royal Hospital of St Katharine. Restored 1969. The view 'towards St Katharine's, the Danish Church, with its spires and precinct' is identified as one of the key views in the Regent's Park Conservation Area appraisal. The street skyline is punctuated by the brick and stone churches and spires of St Katharine's Danish Church which is currently set with trees and planting with a background of clear sky. The site allocation does not contribute to the significance of the listed church.	The local views assessment shows that taller buildings in this site allocation have the potential to affect the setting of the Grade I Regent's Park and the Grade II* St. Katharine's Danish Church in views across Regent's Park from the Broad Walk (view 20, looking south east towards Euston Station). The massing has been developed in a range of massing and heights (upper and lower range) showing the possibility for minimising effects on the heritage assets. Unlike other site allocations, both the 'upper' and 'lower' range tested deliver approximately the same number of homes and in this particular site allocation the range demonstrates different ways the massing could be distributed (rather than an increase in height). The lower range massing has been adjusted to sit behind existing foliage and to avoid appearing directly behind the Grade II* listed Danish Church spires. Nevertheless, it is noted that the tested height of the massing in the lower range distracts from the prominence of the listed church and spires. More recent photography demonstrates that tree cover, even in winter, would impede the visibility of development to the south-east of the church. Although screening is provided by the trees, the 'lower' capacity range has the potential to result in a low level of harm. The 'upper range' with massing

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
		appearing behind the church spires would be more harmful and has the potential to result in a medium level of harm. The capacity massing is only indicative and future development proposals will require a more detailed design process resulting in an appropriate design led architectural response, including a refined massing composition which will need to take into account the setting of this listed church. While 15 storeys with variation in massing has been tested in both the lower and upper range, it is important to note that the site allocation is more circumspect. It states that 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. In discussion with HE, modifications are proposed to this site allocation highlighting that 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. Further views testing will be required for future development proposals to understand the extent of any effects of the detailed design.
Regent's Park Conservation Area	The Regent's Park Conservation Area covers the eastern segment of John Nash's early 19th century Regent's Park development. It is a small part of a greater scheme that extends to the west into the	The site does not fall within the conservation area but the Regent's Park Conservation Area is immediately to the west with the boundary running down Augustus Street.

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	City of Westminster, and comprises a unique planned composition of landscape and buildings, at once classical and picturesque. The significance of the Regent's Park area is of national and international importance. The comprehensive masterplanning of the park, terraces, villas and the (largely redeveloped, but still appreciable in plan form) working market and service area served by canal to the east was on an unprecedented scale of urban design in London. The integration of all elements of a living area, from aristocrat to worker, from decorative to utilitarian, in a single coherent scheme were exhibited here. The conservation area statement sets out key views in the conservation area which include views which emphasize the relationship of city to green space: 'From the Park to the Terraces seeing a clear roofline (without buildings in the background)'. The view 'towards St Katharine's, the Danish Church, with its spires and precinct' is identified as one of the key views in the Regent's Park Conservation Area appraisal.	The local views assessment tested 13 views from a variety of locations in the Regent's Park Conservation Area. Key local views towards the site from Regent's Park (19, 20, 21, 22, 23, 24, 25, 26, 27, 28, N1 and N2) have been assessed. The local views assessment shows that taller buildings in this site allocation have the potential to affect key conservation area views which emphasize the relationship of the 'city' (i.e. the Park's terraces) to green space including views of Chester Terrace, St Katharine's Church and views from the park to the Grade I terraces seeing a clear roofline without buildings in the background (views 20, 21, 22, 23 and 24). The effect of tall buildings in this site allocation on the views from the Park to the terraces is shown to be reduced when these sites deliver the lower range of tested capacity. In the longer views from the Broad Walk, tree cover even in winter has been shown to impede the view of the listed terraces such that tall buildings in these views would have less effect. More recent photography demonstrates that there would only be a limited number of tested views where this site allocation's massing would be visible alongside the listed terraces or the church spires and mainly in winter views. It is also noted that there are already isolated locations where existing tall buildings are visible in views from the Park to the Grade I listed terraces. However, additional development visible from the park is likely to result in a degree of harm to the setting of the conservation area. This is assessed to result in a low level of harm. While 15 storeys with variation in massing has been tested in both the lower and upper range, it is important to note that the site allocation is more circumspect. It states that 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**

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
		testing of impacts on strategic views in the London View Management Framework and **relevant local views**. Given the proximity of the conservation area, future development proposals would need to assess impact on the townscape of Augustus Street and the setting of this part of the conservation area. In discussion with HE, modifications are proposed to the design chapter (including parts D and E of 'Strategic Principle EAP 2: Design') which strengthen references to NPPF, London and Local Plan policies, seeking to highlight the need to avoid/ and or minimise harm to the significance of heritage assets and their settings and which highlight specific sensitives within the conservation area.
Regent's Park (Grade I Registered Park)	Regents Park is significant due to its high aesthetic and design value combining picturesque parkland, formal gardens, water features and carefully planned vistas framed by surrounding architecture.	See Regent's Park Conservation Area above.
Primrose Hill (Grade II Registered Park)	Primrose Hill's significance is derived from being a mid-19th century public park opened in 1842 and adds to the wider Regent's Park landscape.	See St Paul's Cathedral strategic views assessment 4A.1 'Primrose Hill: the summit – looking toward St Paul's Cathedral' above.

E11 CAPITAL CITY COLLEGE

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
Palace of Westminster (Grade I listed and World heritage Site)	Westminster Palace, rebuilt from the year 1840, is a fine example of neo-Gothic architecture. The World Heritage Site – which also comprises the Church of Saint Margaret and Westminster Abbey – is of great historic and symbolic significance.	In relation to the London View Management Framework, part of the site falls within the Landmark Viewing Corridor 2A.2 panorama from Parliament Hill to the Palace of Westminster. The view looks towards the Victoria Tower of the Palace of Westminster. The Palace of Westminster is positioned behind the Euston Tower and the BT Tower. Only the central Lobby Lantern and the Victoria Tower are

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
	The Palace of Westminster illustrates in colossal form the grandeur of constitutional monarchy and the principle of the bicameral parliamentary system, as envisaged in the 19th century, constructed through English architectural references to show the national character. The Palace is one of the most significant monuments of neo-Gothic architecture, as an outstanding, coherent and complete example of neo-Gothic style. The site does not contribute to the significance of the Grade I listed World Heritage Site.	visible. The latter's turrets and finials contrast with the simple housing blocks in the middle ground. The LVMF Strategic views assessment set out in the Background Report identifies those site allocations which have the potential to affect strategic views. A tall building in this site allocation is likely to be visible in this view. Most of the tested massing envelopes has been located so that it lies outside the Landmark Viewing Corridor so as to minimise its effects. It is also set behind the existing Bucklebury Tower so only part of the tested massing is visible in the view. The modelled massing would preserve the viewer's ability to recognise and appreciate the Palace of Westminster. As such there is potential for buildings of additional massing to sit comfortably within the setting of this listed building and result in no harm.
Nos. 9 and 10 St Andrew's Place (Grade I)	2 terraced houses which terminate the view east from the outer circle. The site allocation does not contribute to the significance of the listed terrace.	The local views assessment shows that taller buildings in this site allocation have the potential to affect the setting of the Grade I Regent's Park and the Grade 1 terraced houses. The indicative height tested would impact the setting of these listed houses as seen from the Outer Circle (views 25 and 26). Height tested is nestled within existing tall buildings which already provides a modern context to the historic foreground. The most significant views of the listed buildings are close ones from St Andrew's Place where their composition and detailed design can be appreciated in relation to each other and within the contemporary close setting of the Regent's Park conservation area. From St Andrew's Place, the height and massing of this site allocation is likely to be less visible. Given this, additional buildings would not undermine the composition or the grandeur of the terrace which is best appreciated in closer views. As such there is potential for buildings of additional massing to sit

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
		comfortably within the setting of these listed buildings and result in no harm.
Regent's Park Conservation Area	The Regent's Park Conservation Area covers the eastern segment of John Nash's early 19th century Regent's Park development. It is a small part of a greater scheme that extends to the west into the City of Westminster, and comprises a unique planned composition of landscape and buildings, at once classical and picturesque. The significance of the Regent's Park area is of national and international importance. The comprehensive masterplanning of the park, terraces, villas and the (largely redeveloped, but still appreciable in plan form) working market and service area served by canal to the east was on an unprecedented scale of urban design in London. The integration of all elements of a living area, from aristocrat to worker, from decorative to utilitarian, in a single coherent scheme were exhibited here. The conservation area statement sets out key views in the conservation area which include views which emphasize the relationship of city to green space: 'From the Park to the Terraces seeing a clear roofline (without buildings in the background)'.	The local views assessment tested views from a variety of locations in the Regent's Park Conservation Area including views from the outer circle looking east towards Euston Station (local views 25 and 26). The local views assessment shows that taller buildings in this site allocation have the potential to affect key conservation area views which emphasize the relationship of the city to green space including views from the Park to the Grade I terraces seeing a clear roofline without buildings in the background. In the longer views from the Outer Circle junction with York Bridge, tree cover even in winter has been shown to impede the view of the listed terraced houses which terminate this view such that tall buildings in these views would have less impact. It is also noted that there are existing tall buildings in Regent's Place and in Regents Park Estate visible in these views. Nevertheless, additional development visible from the Park has the potential to result in a low level of harm to the setting of the conservation area. In discussion with HE, modifications are proposed to the design chapter (including parts D and E of 'Strategic Principle EAP 2: Design') which strengthen references to NPPF, London and Local Plan policies, seeking to highlight the need to avoid/ and or minimise harm to the significance of heritage assets and their settings.

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
Regent's Park (Grade I Registered Park)	Regents Park is significant due to its high aesthetic and design value combining picturesque parkland, formal gardens, water features and carefully planned vistas framed by surrounding architecture.	See Regent's Park Conservation Area above.

EA12 SURMA CENTRE

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
The Prince of Wales Public House (Grade II)	Public House dating from the mid-1860s. Its significance relates to the 'remarkable survival' of its interior. The long, narrow space is divided into front and back bars, served by a long counter to left, by late C19 glazed screen with acid etched decoration within Queen Anne style panels with small lights above and below central panels with curved tops. The site allocation does not contribute to the significance of the listed PH.	The indicative height for this site allocation is 20-33m (c. 6-10 storeys) as set out in Figure 3.4 of the EAP Update. This range is considered to reflect the existing context height. Future development of this site allocation would need to consider the setting of the listed PH. The existing building on this site is two storey and is relatively squat in relation to the surrounding context. A redevelopment of this site allocation would provide an opportunity to provide an improved context for the setting of the listed building.

EA13 AMPTHILL ESTATE RAILWAY EDGE

Heritage Asset	Significance and Current Site Conditions	Harm, Mitigations and Enhancement Opportunities
St Paul's Cathedral (Grade I)	St Paul's was designed by Christopher Wren and completed in 1710 and is one of the finest examples of English Baroque architecture. Its iconic dome remains a feature of London's skyline and is protected in a number of LVMF views.	While the site is located in the background view 6A.1 Blackheath to St Paul's, the indicative general height 30-40m would be below the threshold for this view and so would not be visible from Blackheath. The site has not been identified as a tall building location.

	The site does not contribute to the significance of St Paul's..	