

**Euston Area Plan Examination**

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

**Matter 6 Heritage – EAP Team Responses**

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

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

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

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

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

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

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

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

### **Strategic views**

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

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

## Local Views

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

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

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

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

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

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

## **Euston Square Gardens**

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

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

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

**North Euston Cutting and adjacent conservation areas**

- 6.4.6 In terms of heritage assets in North Euston Cutting, Development Principle EAP 3 requires that development proposals “should be sensitive to the historic context and seek to preserve the setting of heritage assets through sensitive design and scale”. The extent of development in the cutting is limited to the southern end of the cutting, and is designed to create a transition between the historic grand terraced homes to the north to the large scale tower blocks in Regents Park Estate to the south. The northern half of the cutting would either be left undeveloped, or if funding could be found, the cutting could be developed as public open space which would help to mitigate the loss of open space elsewhere in the plan area due to the construction of HS2 and provide green space for existing and new residents.
- 6.4.7 The design guidance set out on page 89 seeks to ensure that any development is designed to be sensitive to the historic context of Regent’s Park and Camden Town Conservation Areas, the Grade II listed terraced buildings on Mornington Crescent/Hampstead Road and Mornington Terrace, Grade II listed piers on Mornington Bridge and Grade II\* listed villas on Park Village East. The height of proposed development is scaled to reflect the surrounding properties. A maximum of 4-6 storeys is appropriate to the north of the development parcel identified, with up to around 10 storeys being identified as appropriate at the south of the development parcel close to Hampstead Road.
- 6.4.8 The Historic Area Assessment (document EED4) and Camden Town Conservation Area Appraisal (document CG5) notes that prior to 1906 Park Village East and Mornington Terrace had properties on both sides of the road, but the eastern and western sides respectively were demolished to widen the railway cutting to Euston (see page 13). Therefore development fronting onto Park Village East at the southern end would partially restore the historic street pattern in a sensitive manner.



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### Introduction

1. In carrying out its role in protecting and managing the historic environment English Heritage gives advice to local planning authorities on certain categories of applications affecting the historic environment. English Heritage is the principal Government adviser on the historic environment, advising on planning and listed building consent applications, appeals and other matters affecting the historic environment.
2. English Heritage is consulted on Local Development Plans under the provisions of the Town and Country Planning (Local Planning) (England) Regulations 2012 and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice .
3. English Heritage's representations in relation to the Pre-submission Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development and the specific policies relevant to the historic environment.
4. This statement addresses the Inspector's questions with regards to Matter 6 'Heritage'. Specifically, it sets out English Heritage's involvement in the development of the Plan (6.1), and covers the points that English Heritage has raised concerns about during our discussions with the Council and the GLA, relating to the issue of building heights and tall buildings (6.3).

### Inspector's Question 6.1:

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

5. English Heritage has worked with the Council throughout the production of the Euston Area Plan to ensure that it promotes conservation and enhancement of heritage assets and the historic environment as required by the NPPF. We provided advice in the commissioning of the Historic Area Assessment as part of the Euston Area Plan evidence base, and comments on the previous consultation draft. English Heritage has responded at each stage of consultation process, attended meetings with the Council, supporting the proposed restoration of historic routes and the Plan objectives to improve the landscaping of Euston Square Gardens and to deliver improvements to the settings of other heritage assets.



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6. English Heritage has continued to discuss the details of the evidence base and how the findings are carried forward to inform the Plan to ensure that the Plan is sound. Meetings took place following our response to the Pre-submission Plan on 17 March 2014 prior to submission, and more recently on 12 May. As part of these ongoing discussions, English Heritage has raised particular concerns in relation to the proposals for tall buildings on the site and their impact on heritage assets both inside the Plan area, and beyond it. We have been seeking clarity and reassurance from the Council as the evidence base has been developed, firstly with the modelling of LVMF views and subsequently the modelling of local views in the second half of 2013, with specific reference to the issue of the 60m threshold for tall buildings on the site. Further to our queries and concerns raised in our formal response to the Submission Draft, we have not yet been able to reach a common position with the Council.

### **Inspector's Question 6.3**

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

7. While Appendix 3 suggests the Plan may have an acceptable impact in the context of LVMF views, English Heritage considers that the evidence produced for local views demonstrates that the tall buildings section of the Plan would not be consistent with national policy requirements in relation to the avoidance of harm to the historic environment and an evidence-based approach to local plans. For this reason English Heritage asked the Inspector to extend his question 6.3 to include the local views analysis, as we consider that the Plan could be misleading and will be unhelpful for development management purposes.
8. Despite supporting the modelling of the impacts of building heights to inform the decision making and place-making process as part of a development plan-led approach, English Heritage considers that this Plan does not successfully address the issue of tall buildings in the context of the NPPF. As we set out in our response letter to the Council to the Pre-submission draft of the Plan, we have concerns about Appendix 3 of the Background Report. These specifically relate to the impact of buildings up to 60m tall on nationally and internationally important heritage assets, demonstrated by the local view analysis. We also raised concerns in our letter about the policy implications that fall from the evidence and with the methodology underpinning the modelling.
9. Given the issues that we have identified and which we consider have not been sufficiently resolved, in our opinion the 60m threshold contained within the Plan



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is unsound when assessed against the tests of soundness in paragraph 182 of the NPPF. For this reason we have set out our comments on the four soundness tests in this paragraph the NPPF.

10. Our primary concern is that the Plan is not consistent with the National Planning Policy Framework in respect of the policies for the historic environment contained in section 12, and the corresponding paragraphs of the National Planning Practice Guidance (NPPG). The Framework provides the current policy supporting the legislative provisions in the Planning (Listed Buildings and Conservation Areas) Act 1990. We also have concerns that the opportunities for tall buildings identified in this part of the Plan are not justified, as set out in paragraph 182 of the NPPF, and by the same terms of reference that the Plan will not be effective.
11. **Consistency with National Policy**  
English Heritage notes that while Appendix 3 seeks to provide a convincing justification for new tall buildings in the Euston Area, it relies on a methodology that only considers the management of specific views. The justification and methodology are based on the LVMF and have subsequently been expanded to include local views.
12. However, English Heritage is clear that this is only one consideration when assessing the environmental impact of tall buildings. While the assessment of views contained within the London Plan is an important policy consideration, it is not the statutory test that should be considered when assessing the impact of planning proposals on the historic environment, and specifically on listed buildings.
13. The statutory test is contained in paragraph 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. The Act states that it is the impact of a development on a listed building or its setting or any features of special architectural or historic interest, that the Secretary of State's will have special regard to the desirability of preserving.
14. The difference between the assessment of the impact of proposals on views and on the setting of heritage assets is set out in English Heritage's guidance 'The Setting of Heritage Assets (2011)', 'Seeing History in the View (2011)' and the English Heritage and CABE 'Guidance on Tall Buildings (2007)'. While English Heritage is pleased to see that references to setting have been included in the Submission Draft, it does not overcome the implication on p.49 of the Plan and in Figure 3.4, that the 60m height threshold is likely to be acceptable despite the evidence only assessing some of the issues.



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15. This support for tall buildings in the two locations selected for modelling is more explicitly endorsed in the local view key findings in the Submission Draft of Appendix 3. English Heritage strongly disagrees with these key findings as, in our opinion, one of the views selected for assessment (view 24) shows that a building up to 60m tall at site B would cause significant harm to an important view from Regent's Park, and would therefore result in harm to the significance and setting of both the registered historic park and garden and the terrace of listed buildings affected.
16. To understand this harm it is first necessary to understand the significance of the view, and the assets within it. In English Heritage's opinion the significance of view 24, and the assets within it, namely the grade I listed Chester Terrace, grade I registered Regent's Park (see map attached), grade II railings and street furniture, goes far beyond local interest as could be misconstrued by its inclusion as a local view. This is one of London's most important historic landscapes: in this view the principal elements of historic significance and their spatial associations allow us to understand the relationship between the park and the buildings surrounding it. Chester Terrace listed at grade I, places it within the highest grade, awarded to only 2.5% of listed buildings nationally. The historic relationship between the park and buildings enhances this significance as they were designed by the same architect (John Nash). Taken as an ensemble, this view incorporates some of the capital's most important heritage sites. The significance of the elements contained within this view is widely recognised and appreciated, not only through the statutory listing process, but by the many millions of visitors from around the world (over 5m visitors in 2007-8 according to research published by The Royal Parks).
17. A key feature of the view, as recognised in the Council's Regent's Park Conservation Area Appraisal (ref Camden Guidance CG4), is the uninterrupted roofline of the listed terrace. Similarly, the relationship between the terraces boarding the park and the park itself is highlighted as a key feature of the significance of the park in the entry on English Heritage's Register of Parks and Gardens, and the grandeur and rhythmic composition of the stucco facade are among the defining features of Chester Terrace described in the list description. All these elements would be demonstrably affected in view 24, and harmed, by the intrusion at roof level of a building up to 60m tall.
18. English Heritage considers that the harmful impact would fail to meet the statutory test for special regard to be given to the preservation of listed buildings and their settings, in the context of the information available. The plan proposals, specifically proposed tall building B, would detract from the setting of other heritage assets, notably the grade I Regent's Park. The harm that we have identified would also need to be considered against the policies in Chapter 12 of



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the NPPF. The most relevant of these would be paragraph 132, which notes that 'great weight' should be given to the conservation of heritage assets, and that 'the more important the asset, the greater the weight should be'. Furthermore, English Heritage considers that local view 24, in Appendix 3 and referred to in the Conservation Appraisal (ref CG4) would itself be harmed by a building 60m tall, but notes that despite our advice, this has not been fully acknowledged in the evidence, or in the Plan. Instead both suggest that this impact could be acceptable.

19. By identifying the impact in Appendix 3 of the evidence base, without seeking to mitigate this finding in the Plan itself, this may imply that the impact on the historic environment is acceptable. In our opinion this is not consistent with a positive strategy for the historic environment (Para. 126 NPPF). Impacts on views are recognised as being a key element of the setting of heritage assets; in this case, we consider that the view makes a considerable contribution to the significance of both the listed buildings and the registered park.
20. English Heritage also notes that in addition to not being in accordance with national policy, the impacts of the 60m threshold demonstrated in the background document (view 24) would be inconsistent with the Vision and Objectives of the Plan in relation to development complementing the character and heritage of the area; the Council's Core Strategy (policy CS14, and paras 9.9, 14.24, 14.25 requiring development to preserve and enhance Camden's heritage assets and their settings); the Council's Development Policies Plan (DP 25, paras 25.9, 25.15, 25.23); and the Regent's Park Conservation Area Appraisal and Management Strategy (sections 4.6, 5, Management Strategy section 6.3) which explicitly seeks to resist development that would appear above the roofline of the buildings on Chester Terrace.
21. **Justified**  
Paragraph 152 of the NPPF gives clear guidance that when making local plans, significant adverse impacts on any of the dimensions of sustainable development "should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued..." English Heritage considers that the proposed significant adverse impacts on some of London's most important heritage assets identified in the background evidence, which results from the 60m threshold, are entirely avoidable at this stage. As such the most appropriate strategy to achieve sustainable development has not been achieved, and the Plan should be amended to remove the potential harm.
22. Furthermore, in our opinion the choice of the height limit is based on a partial interpretation of the evidence. This gives English Heritage cause for concern that the advice contained in the NPPG is being overlooked. The Practice Guide notes



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that “the evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan.” It goes on to say “The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively.” English Heritage respectfully submits to the Inspector that the desire to allow buildings up to 60m in the Plan is not justified by the evidence in Appendix 3.

### 23. **Effective**

When setting out strategic priorities in a Plan, the NPPF requires local planning authorities to deliver, among other priorities, the conservation and enhancement of the historic environment (Para 156). While English Heritage is content that many elements of the Submission Draft will achieve this, our concerns raised in relation to the tall buildings issue prevent us from considering this Plan to be effective.

24. English Heritage observes that the harmful impact shown in view 24 would not be visible from within the London Borough of Camden, but would be visible from the neighbouring City of Westminster. We note the response by Westminster City Council in the schedule of representations (21 - City of Westminster 3.3 Design Strategy), raises clear concerns about the impact of taller buildings on views from Regent’s Park. This highlights the cross boundary nature of issues we have raised, which could complicate the development management process if the Plan is left unchanged.

### 25. **Positively prepared**

For the reasons set out in response to question 6.1, English Heritage is content up to a point that the Plan has been positively prepared. This is because the Council’s strategy has been to engage positively with partners, including English Heritage, to assess the options and develop the evidence base. However, the failure to explicitly recognise the significance of the heritage impact and reflect this with appropriate safeguards in the plan is, in our opinion, a significant weakness in the process. The scale of the impacts on heritage assets illustrated in Appendix 3 of the Background Report; the significance of the heritage assets that would be affected, which include grade I listed buildings and a grade I registered Park and Garden and the lack of a satisfactory response to this issue, has brought to a halt an otherwise helpful and proactive process. The plan, as it stands, would potentially invite damaging development proposals in heritage terms in respect of the potential for a building of 60m north of the present Euston station. We do not consider that the guiding principle of the NPPF to achieve sustainable development will be met by the Plan in its current form.

26. English Heritage is aware that further work carried out by the Council and GLA since submission of the Plan may not be available to the Inspector at the present



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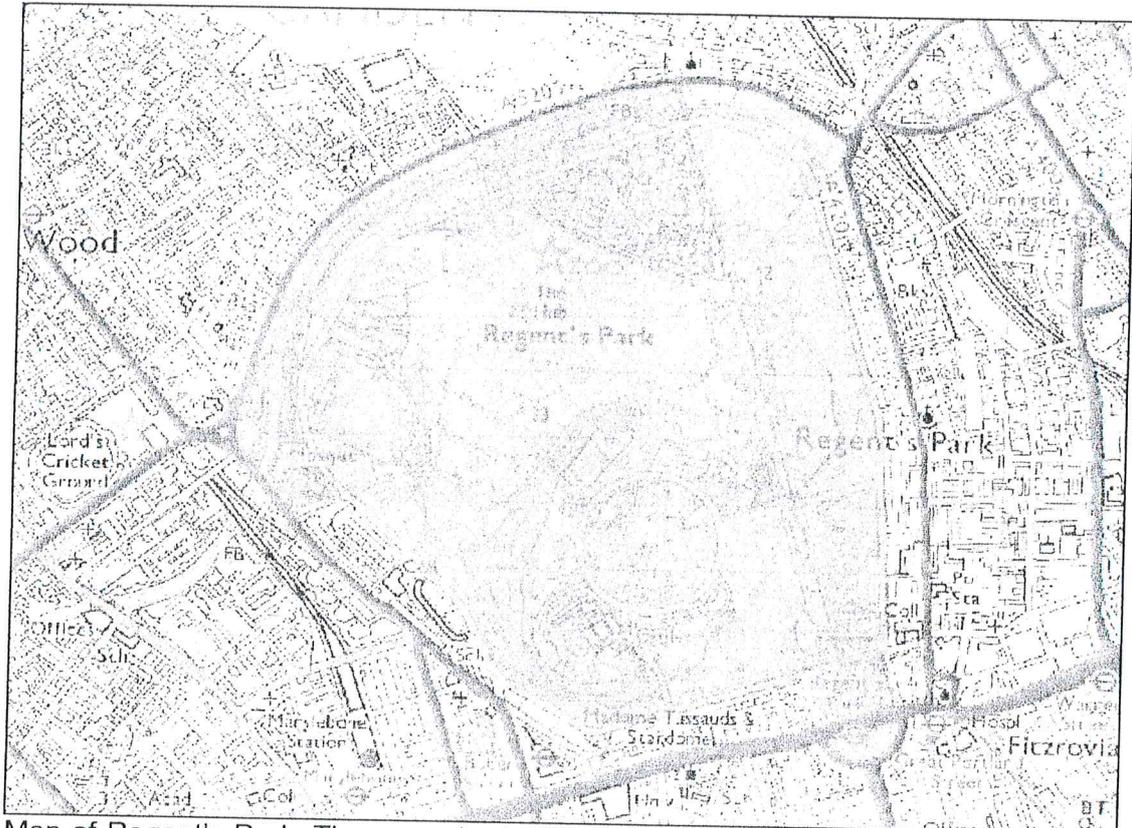
time. This relates to the modelling and the accompanying text and images in the evidence base. We would request that this is made available so that the additional work can be discussed at the hearing. As stated above, we have welcomed much of the work that has been undertaken; we would wish the results to be actively followed through and reflected in the Plan.

### **Recommendation**

27. In order to make the Plan sound, English Heritage would recommend that the wording of paragraph 2 on page 49 of the Plan is amended. In our opinion there are two ways this could be achieved.
28. Firstly, if the reference to a tall building of up to 60m is to be retained, we consider that an additional clause should be added to the paragraph. This could say:  
'It should be noted that testing of building heights in appendix 3 shows that a 60m tall building to the north of the station is likely to result in unacceptable harm to the setting of Regent's Park and the grade I listed Chester Terrace.'
29. Alternatively, the reference in the Plan to potential locations for tall buildings up to 60m, specifically at site B, could be removed altogether from the paragraph. This would ensure that the Plan was in accordance with the evidence base, and would be sounder in relation to the tests in the NPPF.



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Map of Regent's Park. The area shaded in green is the grade I Registered Park and Garden.

## BCAAC ADDITIONAL COMMENTS EAP EXAMINATION

### General observations.

The Advisory Committee is concerned regarding a potential serious conflict of 'interest' given LBC's considerable land ownership within the EAP area.

It notes with great concern, the use of the word 'image' throughout the document. This is not a proper planning concept and should not form part of the justification for the aims and objectives. It is a highly subjective concept redolent of the worlds of public relations and spin-doctors and should be struck out of the final draft. For it to remain is considered to be unsound.

BCAAC also considers the frequent use of vibrancy or **vibrant** to be highly inappropriate in the context of the Euston area, immediately adjacent to Bloomsbury, which is renowned for its tranquillity. The notion of making the Euston Road and its 'environment 'vibrant' is frankly ludicrous and smacks of property developer hype and should be struck out of the document.

### MATTER 4 – EUSTON STATION

BCAAC considers that it will be essential for the council to define and explain what it considers as constituting a 'world class' transport interchange here, by reference to other 'world class' examples for comparison.

### MATTER 6 - HERITAGE

#### Bullet point 4

The Advisory Committee considers it prudent, desirable and sound to follow closely the long standing statutory definitions and requirements placed on both LBC and the Secretary of State regarding listed buildings and conservation areas...e.g. to have '**special regard**'\* and pay **special attention** to the **preservation** or enhancement of conservation areas and their settings.

This should be reflected consistently throughout the document.

*\*It has been held that this requirement means more than just paying lip service and that decision makers have to be able to demonstrate that they have done so in the reasons they give for their determinations.*

## **Bloomsbury Conservation Area**

The Bloomsbury Conservation Area is far more than an “important asset.” “Outstanding” or “world class” would seem to be more appropriate. Its northern boundary runs along the north side of Euston Square. Therefore, it is essential that this conservation area be added to the list in Section 6 and given due consideration at the hearing, as any development is bound to have significant potentially harmful impacts on its special character and appearance. The relationship of the conservation area to its northern setting and the effect of that setting on the area must be given full and serious consideration.

### **Settings**

Recognition should also be made of the importance and sensitivity of the settings of numerous listed buildings, which lie immediately to the south of the EAP area, including Friends House and the terraces and squares of Bloomsbury, for which it is rightly famous. These are especially sensitive to the potentially harmful impact of any proposals for high/tall buildings\*, given the homogenous and consistent layout and scale, an historic townscape hardly equalled anywhere else in central London.

\*it is essential that the plan includes a definition of what constitutes a ‘high’ or ‘tall’ building. One useful example is: “ a building which is significantly higher than its surroundings”

### **Existing station buildings**

Consideration should also be given to the addition of the existing station arrival hall and front podium block under Matter 6 – Heritage bullet point 4, as a potential and undervalued part of our more recent national architectural history and heritage. This is described rather lamely in the document as: “dated”. This unenlightened, dismissive critique is akin to the objections raised about the design of the High Victorian and then deeply unfashionable St Pancras Station building when demolition was proposed. It is surprising, or maybe heartening indeed, that an appealing image of the stylish Seifert podium block is used on the cover of the plan document itself!

Reference is also made to the fact that the retention of these buildings would be the sustainable option, which is stating the obvious. The fact that the

existing hall has been mutilated and neglected by the rail operators should not be allowed to detract from its underlying quality and potential for a tremendous uplift and enhancement, with imagination and remarkably little effort.

This also applies to the external area between the arrival hall and the podium block, which is far from traveller friendly at present and could be radically improved to create an open, stylish and human scaled environment worthy of this premier location.

These buildings are representative of one of the most significant and progressive eras in Britain in the 20<sup>th</sup> century and should not be destroyed without the fullest consideration. BCAAC has already remarked on the appropriateness of the building form to the conservation area in its earlier submission.

The creation of an improved train shed behind a retained and restored front building complex would be entirely consistent with development strategies adopted at both St Pancras and King's Cross, the neighbouring main line stations.

#### **Further BCAAC proposed changes to document text**

Wherever world class design or architecture is mentioned in the plan this should be qualified by the insertion of: **"that also pays proper regard to its historic context."**

It will also be important for the council to define what is meant by world class in this connection by quoting examples as architects are notorious self-propagandists and tastes are subject to wild fluctuations and the fleeting dictates of fads, fancies and fashion.

BCAAC is very concerned that this desire for 'world class' or 'excellent design' could, in practice, be little more than a 'fig-leaf' to attempt to justify gross over-development. In this regard it would refer to the famous 1980s landmark decision relating to the rejection of Lord Palumbo's Mansion House Square proposal notwithstanding the fact it was designed by architect: Mies van der Rohe widely regarded as producing world class architecture. In his landmark decision, the then Secretary of State, Patrick Jenkin stated that:

*“However fine a new design maybe considered to be, proper regard should be had to the context and by that test, the development fails.”*

## **SITE VISITS**

BCAAC trusts that adequate time will be allocated for accompanied site visits and a unique chance to experience the plan area in the wider context of Camden and central London and especially its relationship with the Bloomsbury Conservation Area to the south and how it relates to the surrounding urban landscape generally would be gained from the viewing gallery of the CentrePoint Tower. Therefore, BCAAC considers that such a visit would be very helpful to this Examination.

BCAAC successfully lobbied to have the tower included on the statutory list of buildings of special architectural or historic interest, prompted by a scheme to add external wall-climber lifts at either end by Allies and Morrison, which it vigorously opposed with the personal assistance of Richard Seifert.

It is highly relevant to note that this was probably one of the most despised and unpopular developments of its era, also designed by Richard Seifert and apparently one of his favourite projects.

**TT / BCAAC Jun 2014**



**ENGLISH HERITAGE**

**EUSTON AREA PLAN EXAMINATION  
STATEMENT BY ENGLISH HERITAGE**

**MATTER 6: HERITAGE  
MATTER 6.1: ENGLISH HERITAGE INVOLVEMENT  
MATTER 6.3: TALL BUILDINGS (APPENDIX 3)**

**Hearing session – Wednesday July 2<sup>nd</sup> 2014**

**References:  
Proposed Submission Euston Area Plan, page 49;  
Appendix 3 of Background Report (Impact of tall Buildings on strategic and  
local Views)**