



Historic England

Ms Kate Henry
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Direct Dial: 020 7973 3762

Our ref: PL00793728

Your ref: 2023/3265/P

25 August 2023

Dear Ms Henry

**RE. EUSTON TOWER, 286 EUSTON ROAD, LONDON NW1 3DP
ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT**

Thank you for your letter of 8 August 2023 consulting us about the above EIA Scoping Report.

The existing tall building on the site appears in the setting of a number of designated heritage assets. The proposed scheme is still in development, but the total height is described as 'not materially taller' than the existing building; this does not preclude changes in bulk, massing, articulation or materiality. This development could therefore have an impact, which may be greater, reduced, or different in nature, upon designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets.

We would also expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk) and relevant local authority staff.

We would strongly recommend that you involve the Heritage and Conservation Officer of the London Borough of Camden and the archaeological staff at Historic England's Greater London Archaeological Advisory Service in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise



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potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Given the height of the structure associated with the proposed development and the surrounding topography and urban context, this development will be visible across a large area and could, as a result, affect the significance of heritage assets at some distance from this site itself. We would expect the assessment to clearly demonstrate that the extent of the proposed study area is of the appropriate size to ensure that all heritage assets likely to be affected by this development have been included and can be properly assessed. It is important that the assessment is designed to ensure that all impacts are fully understood, potentially involving the use of section drawings and techniques such as photomontages.

The Townscape, Visual and Built Heritage Assessment Topic Sheet in Annex D explains that the impact on some heritage assets are expected to be similar that of the present building because the proposed new development is comparable in height to the existing building. Therefore, detailed assessments of impact on some heritage assets within the main 500m diameter study area are not proposed. This may be a proportionate approach, but will depend on the degree to which the development deviates in design, massing, and materiality, as well as height, from the current building. We are glad to note the inclusion of some sensitive heritage assets outside the primary study area, including Regent's Park, a Grade I Registered Park and Garden, and highly graded assets within it.

We are glad to note that Historic England's Good Practice Advice Note 3, 'The Setting of Heritage Assets' is noted in the scoping report as forming part of the basis for assessment of setting impacts. We recommend that Historic England's updated advice in 'Tall Buildings: Historic England Advice Note 4' (2022) also informs the assessment of the scheme and its impacts.

The Townscape and Visual Impact Assessment topic summary on page 9 of the report and the Townscape, Visual and Built Heritage Assessment Topic Sheet in Annex D refer to the development appearing in two LVMF Panoramas and one LVMF river prospect. It should be particularly noted that the development will appear - as does the current building - within the protected vista, and in part within the landmark viewing corridor, for LVMF view 2A.2 Parliament Hill to Westminster. Changes in massing or materiality could potentially have an impact on the prominence of the Palace of Westminster in this view, and this should be assessed in the Environmental Statement.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage



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assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to *in situ* decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

These comments should be read alongside the separate correspondence from Historic England's Greater London Archaeological Advisory Service on the scoping out of archaeology from these proposals.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

Kathy Clark
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cc:



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