

ADVICE from The Regent's Park Conservation Area Advisory Committee
12A Manley Street, London NW1 8LT

5 February 2024

Euston Tower 2023/5240/P Revised advice in place of 8 January 2024 advice

Objection.

1. The RPCAAC considered pre-app information at its meeting on 6 November 2023, and the formal application at its meeting on 8 January 2024. The Committee was grateful for the additional CGIs which we received from the applicant in time for our meeting on 5 February, when this revised advice was agreed.
2. The Committee noted with regret that it had not been consulted earlier in the lengthy pre-app period. It was consulted only after the application design had been finalized, depriving the CAAC of the opportunity to comment on the design during its development.
3. The Committee noted that the tower is part of the Euston Centre, from 1962-72 (Sidney Kaye, Eric Firmin & Partners) described (Pevsner, *London 4, North*, pp. 375-76) as 'early intrusions of large-scale offices into the West End', the lower blocks described as 'stretching bleakly' beside the widened road.
4. While the RPCAAC acknowledges that the Tower exists and will survive, we note that the planning context in 1962-72, when the Tower was built, was significantly different from now. While some of the Regent's Park buildings were Listed in 1954 – Holy Trinity Albany Street and 2 Marylebone Road, for example – many of the major Park buildings were only Listed later, in 1974 – St Andrew's Place and Park Square East, for example. The Regent's Park Conservation Area was only designated in 1969. The *Regent's Park Conservation Area Appraisal and Management Strategy* was only adopted in 2011.
5. In this changed context the RPCAAC seeks mitigation of the impact of the Tower on the conservation area and the setting of its Listed Buildings. The *RPCAAC Appraisal and Management Strategy* at 4.6 emphasises the importance of views from within the Park across the terraces uninterrupted by other buildings. The Committee reviewed how far the application mitigates or exacerbates the negative impact of the Tower on the Regent's Park heritage assets.
6. The RPCAAC welcomed the decision not to increase the height of the Tower.
7. The Committee regrets the increase in breadth and bulk which the RPCAAC advises is harmful to the special significance of the Regent's Park CA, and fails to preserve or enhance the character and appearance of the conservation area.
8. The Committee has sought to investigate the implications of the increase in bulk for views from the conservation area, attempting to assess whether the modifications proposed to the modelling – 'texture' – of the proposed elevation design would mitigate the harmful impact of the increase in bulk.
9. Four visualisations submitted by the applicant could be helpful in this assessment: see the applicants' *Townscapes-Visual-and-Built-Heritage-Assessment*, view 07, pp. 110-13; view A14 pp. 237-39, view B3 pp. 280-84; and view B4 pp. 285-87. However, there are limitations in the utility of 3 of these views in assessing the impact on the CA.

View 07 is helpful, but the viewing point is too far west to allow for the appropriate assessment

View B3 only show the wire-frame which demonstrates the increase in bulk but not the proposed elevational treatment

View B4 is from within the tree planting and does not show the Tower as clearly as it is seen in fact from the adjacent English Garden area (see our right-hand image below).

10. As a result of these limitations on the views submitted, the RPCAAC, in discussion with the applicant, has requested 2 further views. These are views from the playing fields opposite Cumberland Terrace, and the English Garden opposite Chester Gate. Three views have now been received and were reviewed by the Committee on 5 February 2024.



11. Reviewing the applicant's images 07 and A14, and the 3 extra images now submitted, the RPCAAC assessed both the impact of the proposed modelling of the elevations and of the colour. The RPCAAC agreed that, as seen especially in image 07 and the new images, the proposed colour markedly worsens the harm caused by the Tower. That is, the extra bulk and width of the Tower is harmful: the harm is made worse by the proposed colour.

12. Image 07 and the 3 extra images shows the existing tower blending better with the blue/grey colours of the roofscapes of the Park buildings and the luminosity of the sky. The warmer colours currently proposed for the Tower conflict with the subtler, cool colours – perhaps more characteristic of northern European light. We advise that the colours proposed for the Tower exacerbate rather than mitigate the harm to the setting of the Listed Buildings and the character and appearance of the conservation area.

13. We also advise that the modifications to the upper storeys of the Tower and its roofline increase the harmful visual impact of the increased bulk of the Tower.

14. On the basis of the images now reviewed, we advise that, given the modifications to the upper storeys and to the colour of the tower, the proposed modelling of the elevations of the tower does not mitigate the harmful impact of the increase in bulk of the tower.

15. We are seriously concerned that the current proposal would establish a precedent which would allow further, cumulative, harm to the heritage of local communities and of national and international significance.

16. The RPCAAC advises that the proposals for the Tower exacerbate rather than mitigate the harm to the setting of the relevant Listed Buildings and fail to preserve or enhance the character and appearance of the Regent's Park conservation area.



Richard Simpson FSA
Chair

Euston Tower

London

Regent's Park CAAC views

January 2024



Introduction

Following our meeting on 6 December with Richard Simpson, Chair of the Regent's Park Conservation Area Advisory Committee (RPCAAC), and the subsequent clarification of the positions of the extra views from Regent's Park that Richard suggested (RPCAAC Views 2, 3 and 5), two new verified views from Regent's Park have been prepared.

RPCAAC position 2 is taken from the same position as View A14 included in the submitted visual assessment. Visualiser Cityscape has prepared new verified rendered views from the positions of RPCAAC Views 3 and 5. Position 5 is a little forward of the RPCAAC suggested position to avoid being screened by trees.

The two new views have been taken with a 24mm camera lens, which provides a wider field of view than the cropped photographs provided by the RPCAAC, for comparability with the other views that were modelled from the park. These views therefore show more of the context of the park.

Overlay map showing existing application views and Regent's Park CAAC requested positions

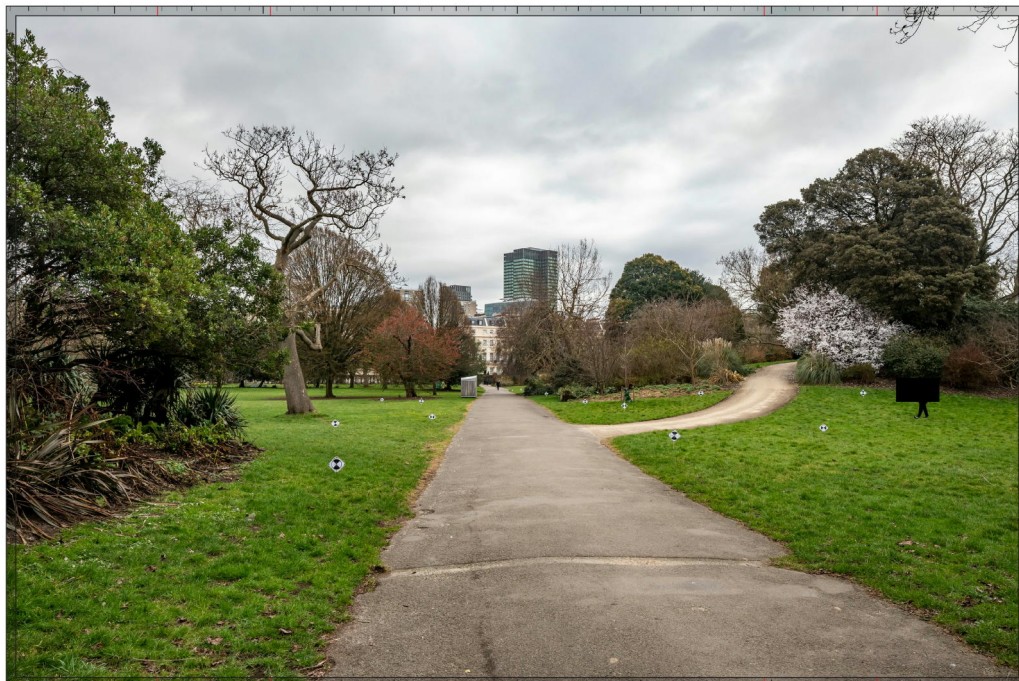
● Regent's Park CAAC positions

✂ Existing application views



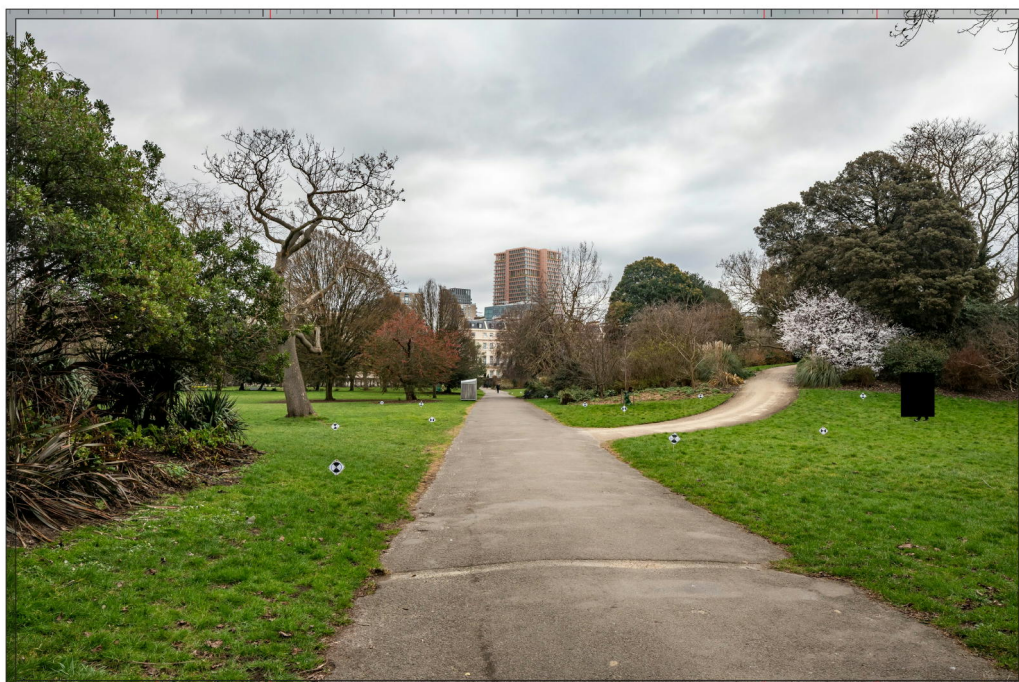
View 02

Existing view



View 02

Proposed view



View 03

Existing view



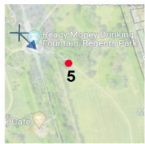
View 03

Proposed view



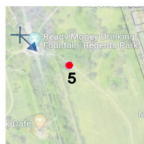
View 05

Existing view



View 05

Proposed view



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