

EUSTON TOWER

Archaeological Assessment
Addendum

December 2024





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Euston Tower
286 Euston Road
London NW1 3DP

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Addendum to the 2023 Archaeological Desk-Based Assessment

Introduction and overview

The Applicant (British Land Property Management Limited) has commissioned MOLA to provide this Addendum to an Archaeological Desk-Based Assessment (also prepared by MOLA) for the Site in 2023 ('the 2023 DBA').

This Archaeological Desk-Based Assessment Addendum summarises the revisions made to the pending strategic application for Full Planning Permission (ref. 2023/5240/P), submitted in December 2023 for the Proposed Development at Euston Tower (286 Euston Road, London).

This Addendum has been prepared detailing the revisions to the pending scheme (the "Proposed Development"). For the avoidance of doubt, the 2023 DBA which accompanied the December 2023 Submission is considered as read: this Addendum deals only with the 2024 Revisions and any necessary updates to the archaeological assessment as a result of these revisions.

The Applicant has undertaken extensive consultation during both the pre-application and determination stages of the Proposed Development and has sought to respond positively to the responses received. The scheme has been revised in response to feedback from Officers, local stakeholders and residents, the Regents Park Conservation Area Advisory Committee and statutory consultees, including Historic England and The Greater London Authority. This Addendum also clarifies and provides further details responding to consultation responses received since the original submission in December 2023. Save where varied or supplemented in this Addendum, the content of the 2023 DBA remains valid and up to date.

The Description of Development for the Proposed Development, as updated for the 2024 Revisions, has been amended to the following (additions in bold):

“Redevelopment of Euston Tower comprising retention of parts of the existing building (including central core, basement and foundations) and erection of a new building incorporating these retained elements, to provide a 32-storey mixed-use building providing offices and research and development floorspace (Class E(g)) and office, retail, café and restaurant space (Class E) and Enterprise space (Class E/F) at ground and first floors, and associated external terraces; public realm enhancements, including new landscaping and provision of new publicly accessible steps and ramp; short and long stay cycle storage; servicing; refuse storage; plant and other ancillary and associated work.”

The Site

Euston Tower is situated within the London Borough of Camden ('LBC'), and the ward of Regent's Park. The Site is bounded by Euston Road (south), Hampstead Road (east), Brock Street (north) and Regent's Place (west). The Site covers an area of 8,079sqm, comprised of an existing single, ground plus 36-storey tower. The existing tower, which has been largely vacant for several years, predominantly comprises office uses on the upper floors, with retail uses in operation at ground floor level.

The Site does not fall within a conservation area (CA); the Fitzroy Square CA and Bloomsbury CA are both located in close proximity (south). There are no built elements of the Site that are statutorily or locally listed. There are several buildings located within a close radius of the Site that are Grade I, Grade II and Grade II* listed. An application for a Certificate of Immunity from listing was granted in July 2024 (reference number: 1488199).

The Site has a PTAL rating of 6b indicating 'excellent' transport connectivity. The Site is mainly served by Warren Street Underground Station (south), Euston Square Underground Station (east) and Great Portland Street Underground Station (west). There are also several bus routes that serve the Site along Euston Road (south) and Hampstead Road (east).

The land surrounding the Site consists of a range of uses. The Site is part of British Land's Regent's Place campus, designated within the Knowledge Quarter Innovation District ('KQID'), home to world-class clusters of scientific and knowledge-based institutions and companies specialising in life-sciences, data and technology and creative industries. Regent's Place comprises commercial, office, residential, cultural and community land uses, as well as pedestrianised streets and public realm incorporated into the space. The closest residential properties are located along Drummond Street (north) and Hampstead Road (east).

2024 Revised Proposal

The 2024 Proposed Development is for the redevelopment of Euston Tower comprising retention of parts of the existing building (including central core, basement and foundations) and erection of a new building incorporating these retained elements, to provide a 32-storey mixed-use building.

As part of the redevelopment a new Plant Level for an attenuation tank would be constructed below B1 basement level.

Update of the archaeological background of the Site and study area

The LBC's Archaeological Advisor, the Greater London Archaeological Advisory Service of Historic England, confirmed in an email to MOLA dated 13/08/2024 that since no significant archaeological work has taken place in the area since the 2023 DBA, an archaeological Addendum to supplement the 2023 DBA is sufficient to support the planning application, and that a new search of data held on the Greater London Historic Environment Record (GLHER) is not required.

Archaeological Priority Areas

LBC's Archaeological Priority Areas (APAs) remain as reported in the 2021 DBA: the Site is not in an APA.

Assessment of the revised development proposals and the impacts of these on archaeology (buried heritage assets)

Statement of archaeological potential

Construction of the existing basement will have removed archaeological remains from within its footprint, other than possible isolated prehistoric stone tools within the gravels beneath. There have been no changes to the archaeological potential of the Site as reported in the 2023 DBA, i.e. a generally low potential for archaeological remains from any period. Although occasional in situ early-prehistoric (Palaeolithic) flint tools are possible at depth within the natural gravels, these are very rare. There is a low to moderate potential for occasional ex-situ stone tools within the gravels, of low heritage significance.

Re-statement of the proposed development in 2023

The 2023 Proposed Development comprised redevelopment of Euston Tower, including the partial retention (retention of existing core, foundations and basement), disassembly, reuse and extension of the existing building, to provide a 32-storey building for mixed use.

A new basement level B2 would have been constructed in one area in the western part of the Site.

Statement of the revised proposed development in 2024

The 2024 Proposed Development is also for the redevelopment of Euston Tower. The proposed changes at the above-ground levels would have no impact on archaeology.

A new Plant Level for an attenuation tank is to be constructed in the western part of the Site below B1 basement level. The location and dimensions of Plant Level in the 2024 Proposed Development are slightly different from the B2 basement level in the 2023 Proposed Development, but is of a similar overall size. The impacts would remain as reported in the 2023 DBA, i.e., that isolated Palaeolithic stone tools could be removed by the proposed excavation for the Plant Level.

Illustrations (appended)

- Fig 1 – Proposed ground floor plan (3XN, Dwg. ET-DR-A-20100, Rev. P2, 04/11/2024)
- Fig 2 – Proposed basement level B1 plan (3XN, Dwg. ET-DR-A-20099, Rev. P2, 04/11/2024)

- Fig 3 – Proposed Plant Level plan (3XN, Dwg. ET-DR-A-20098, Rev. P2, 04/11/2024)

Planning Policy

The National Planning Policy Framework (NPPF)

Since the production of the 2023 DBA the National Planning Policy Framework (NPPF) has been updated, in December 2023¹. However, the new NPPF does not materially affect the assessment in the DBA.

The London Plan

Since the production of the 2023 DBA the Greater London Authority has not updated the London Plan, which was issued in March 2021².

Local planning policy

LBC's Local Plan (2017) is still current. However LBC have begun reviewing their Local Plan (2017). The draft new Local Plan³ was consulted on from 17 January to 13 March 2024. LBC are currently considering all the responses received and will publish an updated version of the Local Plan for further consultation later this year.

The draft Heritage Policy is D5, which will replace the 2017 Heritage Policy D2. The wording of the Archaeology section in draft Heritage Policy D5 is identical to that included in 2017 Heritage Policy D2.

Conclusion

The 2024 proposals will not cause any new or greater impacts on archaeological remains from those reported in the 2023 DBA. Thus, the conclusions and recommendations of the 2023 DBA remain valid. Consequently, an archaeological watching brief may be required during ground reduction for the proposed basement level B2, which would ensure that if archaeological heritage assets are affected, they are not removed without record, in accordance with the LBC's policies regarding such assets. However, the final decision on any work required in association with the proposed development rests with the LBC.

Paul Riggott

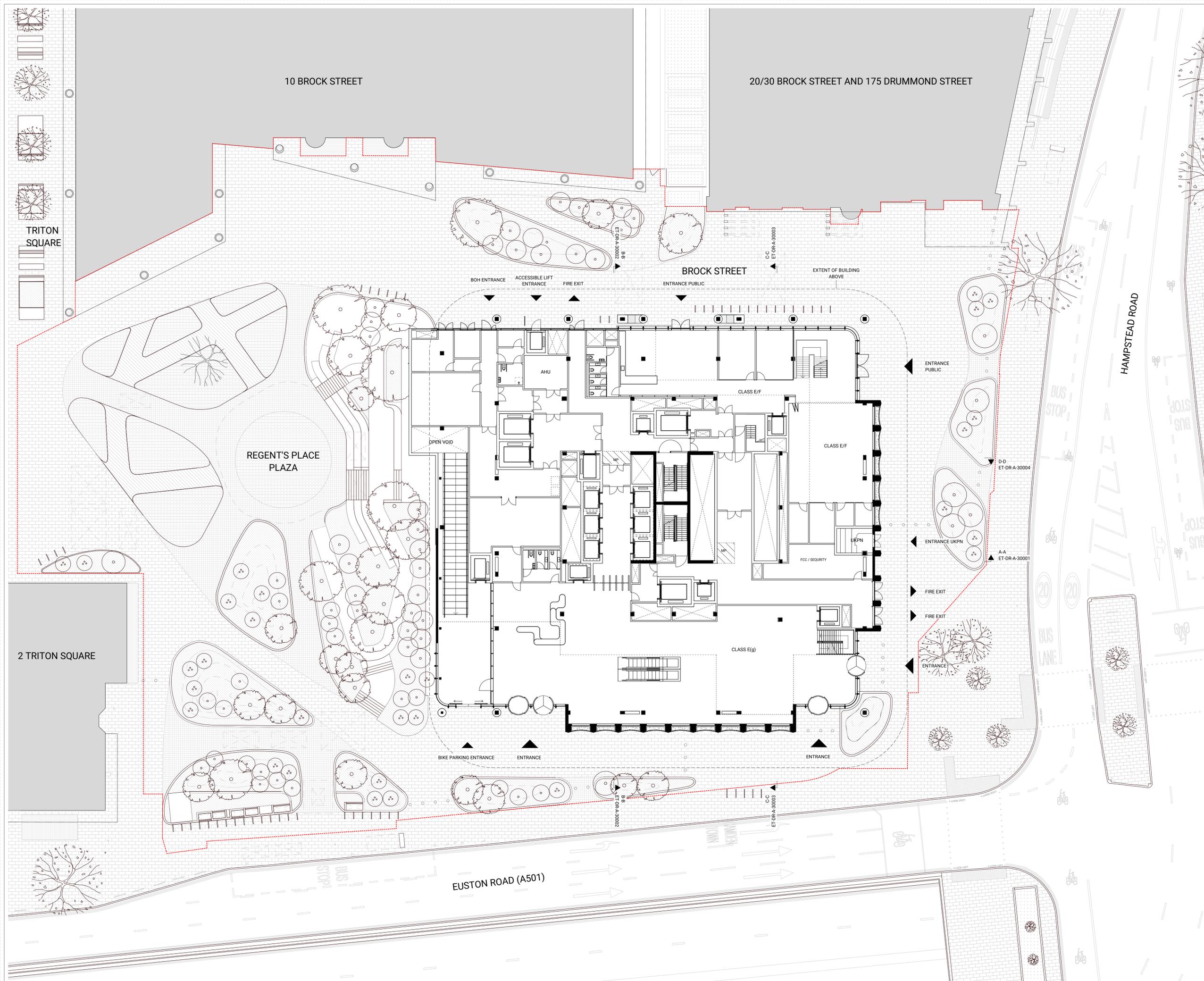
MOLA

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¹ MHCLG [Ministry of Housing, Communities & Local Government, formerly the Department for Levelling Up, Housing and Communities] 2023 National Planning Policy Framework

² GLA [Greater London Authority], 2021, The London Plan: The Spatial Development Strategy for Greater London

³ LBC [London Borough of Camden], 2024, Draft New Camden Local Plan



Euston Tower

Notes

1. Do not scale drawings. Dimensions govern.
2. All dimensions are in millimeters unless noted otherwise.
3. All dimensions shall be verified on site before proceeding.
4. The author shall be notified in writing of any discrepancies.
5. This drawing is protected by copyright.
6. Façade modulation shown as indicative.

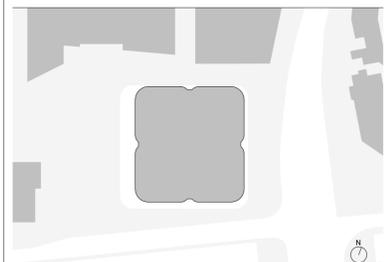
Revisions:

P1: Planning Submission (December 2023)

P2: Revisions to Application



PROJECT NAME: EUSTON TOWER
 AUTHOR PROJECT NUMBER: 1312
 PROJECT PHASE: PLANNING APPLICATION
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GRAPHIC	0 2M 4M 10M
SCALE	1 : 200 (A1)
AUTHOR	3XN
REVISION	P2
ISSUE DATE	04/11/2024
DRAWING TITLE	Level 00 Plan
DRAWING NUMBER	ET-DR-A-20100

