







Baseline (Crop)





Consented (Crop)





Proposed (Crop)





Cumulative (Crop)





Proposed with LVMF Threshold (Crop)



HayesDavidson

Appendix 2: Context to Impact Assessment

Camden Council's Decision-Making

13. In considering the heritage impacts arising from the consented scheme, the Council's committee report stated at paragraph 8.27:

"Bloomsbury Conservation Area

8.27 In conclusion, the development will introduce a building of a much larger scale than existing, which will harm the character of the surrounding conservation area to some extent. The harm in the instance derives from the increased height of the building compared to the height of the existing frontage building and the neighbouring Paul O'Gorman building which the new cancer centre would also be taller than. However, the level of harm caused to the conservation area is considered to be less than substantial and will need to be balanced in the decision making process, given the public benefits arising from the scheme.

Nearby Listed Buildings

8.31 Whilst the proposal would be significantly taller than the residential terrace opposite, its increased size and contextual design is considered to break up its massing and provide some relief to the building whilst also referencing the domestic character of the listed terrace. However, the surviving terraces remain integral to the character of one of the earliest surviving areas of residential development in Bloomsbury and, notwithstanding the hospital, retains great consistency of scale, grain and architecture with its neighbouring streets. By increasing the scale directly opposite these listed buildings, their setting will be harmed to some extent, the level of harm being again considered to be less than substantial. This will need to be balanced in the decision making process, given the public benefits arising from the scheme.

Impact on LVMF

8.34 Following receipt of these changes Historic England confirmed that the proposed alterations had helped to address their concerns and they no longer had any objection to the proposals. Notwithstanding this, the proposals are still considered by officers to cause a very low level of less than substantial harm to the views of St Paul's, which is a Grade I listed building. However, as can be seen from the images above, the level of encroachment is minimal and clear views of the western towers, and the main dome, would be retained as a result of the revised proposals. Thus preserving the setting and significance of the cathedral. As such, the low level of less than substantial harm caused to the views of St Paul's Cathedral must be given due weight in the planning balance in accordance with paragraph 202 of the NPPF, later on in this report.

Conclusion

8.50 The overall size, scale and design of the proposed development is considered to represent a high quality development that, whilst significantly larger than the existing frontage building and residential dwellings opposite, is considered to respond to the key characteristics of buildings in this Sub Area of the Bloomsbury Conservation Area. Therefore, whilst the proposed development would have some encroachment into the LVMF of St Pauls and would have an impact on the character and setting of the

conservation area and nearby listed buildings, the harm caused is considered to be less than substantial.

8.51 Where less than substantial harm to a heritage asset is identified, the NPPF requires this harm to be weighed against the public benefits of the scheme to determine acceptability. In the case of the current application, the proposals to redevelop the existing frontage building to provide a new children's cancer centre would provide significant public benefits that officers consider would outweigh any perceived harm to the designated heritage assets that surround the site. As such, the proposals are considered to be in accordance with Local Plan Policy D2 (Heritage) and the NPPF, subject to conditions securing details of all facing materials and detailed drawings of all elevations."

14. The overall planning balance was articulated in the conclusion of the committee report, which states, with regard to built heritage, townscape and VIA matters:

"CONCLUSION

23.1 The proposed development is considered to be a carefully conceived and high quality scheme which is a result of extensive pre-application discussions...

... 23.5 Officers acknowledge that the size and scale of the proposed development would have an adverse impact on the designated heritage assets that surround it namely, the Bloomsbury Conservation Area, Grade II listed building directly opposite and the protected views of St Pauls Cathedral

23.6 In terms of the impact on the surrounding conservation area, whilst officers consider the massing to be justified given the discussion in the heritage section above, the development is considered to cause some level of harm to the overall character and appearance of the conservation area. However given the dominance of largescale institutional uses already existing in this sub-area, the overall harm is considered to be less than substantial. Similarly, increasing the scale directly opposite the listed buildings facing the site, will harm their setting to some extent, the level of harm being again considered to be less than substantial, which again need to be balanced in the decision making process, given the public benefits arising from the scheme.

23.7 With regard to the impact the proposals would have on St Paul's Cathedral and the LVMF, officers consider there to be a low level negative impact to the significance of the setting of the Grade 1 listed building and its protected view. This impact has been mitigated further by the revisions sought during the course of the application to reduce the size of the eastern core and thus the impact on the LVMF and St Paul's.

23.8 The harm in each case discussed above would amount to less than substantial harm, as characterised by the NPPF. As such, although these harms are given considerable importance and weight in accordance with s72 and s66 of the Planning (Listed Buildings and Conservation Area) Act 1990, cumulatively it is considered that the harm would still amount to less than substantial harm which is outweighed by the considerable public benefits of the proposals.

23.9 The development would deliver significant public benefit as discussed throughout the report. It would also cause less than substantial harm to the Bloomsbury Conservation Area, the setting of nearby listed buildings and St Paul's LVMF as designated heritage assets. NPPF paragraph 202 instructs that "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

23.10 However, it is noted that s72 and s66 of the Listed Building Act impose duties to treat harm to designated heritage assets as a consideration to which the decisionmaker must give 'considerable importance and weight', and not un-tilted balance. Therefore, officers consider that despite this weight of presumption against harm, the benefits which would accompany the proposed development would outweigh the harm.

23.11 On this basis, the application is recommended for approval subject to conditions and the signing of a s106 legal agreement."

GLA Position

15. In their Stage 2 report, the GLA confirmed the following matters:

"Urban design, heritage and views

29. At consultation stage the Council were advised that the proposal raises no strategic issues with regards to layout, general appearance, mass and overall height and was considered acceptable as it is expected to integrate into the local character of the area when compared to the existing buildings on site. Notwithstanding this, the Council were requested to include conditions to secure further details on how landscaping can be delivered and maintained. With regards to architectural quality and materials, the Council were requested to secure high quality and robust materials by way of conditions.

30. In this regard, the draft decision notice includes conditions relating to the requirement for the applicant to submit and obtain approval of submission of external materials and landscaping to ensure they are of a high quality and implementable. With respect to urban design, GLA officers are of the view that subject to meeting the requirements of the imposed conditions, the proposed materials, landscaping and overall appearance does not warrant the Mayor's intervention.

Heritage

32. In terms of heritage, at consultation stage, GLA officers formed the view that the proposal will have a positive impact upon the character of the Bloomsbury Conservation Area (BCA) and will not result in harm to the significance and setting of any nearby heritage assets and would be in accordance with Policy HC1 of the London Plan and the NPPF. Upon completion of their assessment, the Council concluded that the proposed development would result in less than substantial harm to the surrounding conservation area and other heritage assets. Historic England has no objection to the application on heritage grounds as it is of the view that the application is capable of meeting the requirements of the NPPF, in particular paragraph numbers 195 to 202.

Notwithstanding this, with regards to the developments impact upon the BCA, Historic England is of the view that the proposal will cause some harm to its significance and has stated:

‘Council will weigh heritage harm that would be caused by the proposal against the public benefits of the proposal, which are likely to be very considerable. Nonetheless, the proposal will have a major and lasting impact on the conservation area and the settings of its listed buildings, and any harm it causes should be absolutely minimal if it cannot be avoided. It should also achieve the very highest standards of design that befit this important London place and cherished institution’.

33. With respect to impacts upon St Paul’s, upon receiving additional detail, Historic England stated that the proposal would cause a very low level of less than substantial harm to its significance. This is discussed again in the strategic views section below. As outlined previously, other conservation organisations (The Great Ormond Street Group, The Georgian Group, SPAB and the Bloomsbury CAAC) also raised concern with regards to impact upon surrounding heritage assets.

34. As outlined above, at consultation stage, GLA officers acknowledged that the proposal would have a noticeable impact upon the BCA, however formed the view that this impact when compared to the existing building (and given the scale of other institutional buildings on the hospital site) would not harm the significance of nearby heritage assets and would not impact up people’s ability to appreciate St Pauls in accordance with HC4 of the London Plan.

35. Notwithstanding this, given Historic England, the Council and other conservation organisations have formed the view that the proposal would have a less than substantial harm on heritage, GLA officers have taken the view that the NPPF balancing exercise should be considered. The NPPF requires that where a development will lead to ‘less than substantial harm’, that harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Balancing exercise

36. In this regard the scheme proposes to deliver a number of public benefits including:

- The scheme proposes to increase floorspace dedicated to health care facilities with a focus on children’s health and wellbeing by circa 67% (including 64 single inpatient bedrooms; 8 neonatal intensive care unit bedrooms; 24 infusion bays/rooms; three operating theatres and an interventional MRI; an imaging suite; including MRI; CT and Pet CT scanner facilities; hospital school with 4 flexible classrooms)*
- The proposal is expected to support 70 additional full time jobs during operation and more than 300 jobs during construction.*
- The proposal is also located within a highly sustainable location and will optimise the space available within a dedicated health care precinct allowing for an efficient use of facilities.*

- *Given the nature, location and proposed floorspace, the new children's hospital will benefit not only the local residents of Camden but also London and the wider south-east of England.*
- *The new hospital will deliver sustainable development of a brownfield site, improve public realm in and around the wider hospital precinct and enhance biodiversity within the site.*

37. In conclusion, given the scale and nature of the proposal, GLA officers have formed the view that on balance, the considerable public benefits package outlined above would outweigh 'less than substantial' harm to the setting and significance of the BCA including its listed buildings and the significance of St Pauls and therefore accords with the provisions of the NPPF and is acceptable on balance in respect to Policy HC1.

Strategic views

38. At consultation stage, although minor elements of the building will sit above viewing threshold heights, the GLA formed the view that the proposed development would not result in having any adverse impact upon strategic views, particularly those to the strategically important landmark of St Pauls (from Primrose hill, Greenwich Park and Blackheath Point). Since Stage 1, the proposal has been amended to further reduce the impacts of these structures on the roof, and addition details have been submitted to demonstrate that the level of encroachment is minimal and clear views of the western towers, and the main dome, would be retained. As such GLA officers retain the view, that the proposal satisfies the objectives and guidance of both the NPPF and Policies HC3 and HC4 of the London Plan and London View Management Framework SPG."

Historic England Representations

5.18 Historic England's final representations to the consented scheme stated in summary:

"Summary

Great Ormond Street is at the heart of one of London's finest surviving areas of early-Georgian townscape, essential to the character and appearance of Bloomsbury Conservation Area. The proposed redevelopment of the Frontage Building of Great Ormond Street Hospital (GOSH) will be a major transformation of the street and would also rise in front of St Paul's Cathedral in the London Views Management Framework (LVMF) vista from Primrose Hill, which is an important aspect of the metropolitan landmark's setting, and thereby harm its significance. The local planning authority must have special regard to preserving these designated heritage assets and their settings, so harm should be minimised. Thanks to additional detailed visualisations that now satisfy mayoral guidance on the LVMF, a considerable reduction in the size of one of the largest elements in the proposed roofscape can be seen to reduce the degree to which the proposal would encroach on St Paul's Cathedral in the view, such that the harm that would arise from the proposals can reasonably be weighed against their public benefits as planning policy requires."

Turley Office
Brownlow Yard
12 Roger Street
London
WC1N 2JU

T 020 7851 4010