



ENGLISH HERITAGE

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Mr Charles Thuaire
London Borough of Camden
Development Control Planning Services
Camden Town Hall
Argyle Street
LONDON
WC1H 8ND

Direct Dial: 020 7973 3765
Direct Fax: 020 7973 3792

Our ref: P00438915

1 December 2014

Dear Mr Thuaire

**Notifications under Circular 01/2001, Circular 08/2009 &
T&CP (Development Management Procedure) Order 2010
ROYAL FREE HOSPITAL POND STREET LONDON NW3 2QG
Application No 2014/6845/P**

Thank you for your letter of 14 November 2014 notifying English Heritage of the above application. As you will be aware, we have seen the proposals during pre-application discussions and have provided comments as part of that process. In the interest of clarity, our position is set out in full below.

Summary

The Royal Free Hospital is located in Hampstead, an important example of one of the many villages which became part of London as its expansion intensified in the C19. Evidence of its earlier character and appearance survives and there are a number of designated heritage assets. Whilst the hospital is not within a conservation area, the proposed new building to extend its research and improve its facilities would impact on highly graded heritage assets.

English Heritage Advice

Significance

The Royal Free Hospital was founded in 1828 by William Marsden to provide healthcare for the poor. The proposed site was occupied from the mid C19 by Hampstead General Hospital. However, this building was demolished and became part of a larger site redeveloped in the 1970s for the Royal Free Hospital. This is now the main teaching hospital and A&E centre for NW London. The hospital entrance is located on Pond Street but its site is bounded by Fleet Road, Rosslyn Hill, Hill Street and Aspern Grove. The hospital building is not listed and not located within a conservation area.

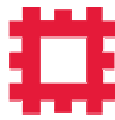
St Stephen's Church, Rosslyn Hill stands next to the hospital and is listed grade I.



1 WATERHOUSE SQUARE 138-142 HOLBORN LONDON EC1N 2ST

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Widely considered to be the finest of Teulon's 114 churches and a neo-gothic masterpiece, its substantial height, scale and massing at the top of hill on Pond Street makes it a distinctive local landmark. Closed for worship in 1977, the church was identified on the first 'Heritage at Risk' Register. With significant grant assistance from English Heritage and the Heritage Lottery Fund as well as local fundraising, the building was brought back into use as a community space/hire venue and won a Heritage Angel Award from English Heritage. The church is of great historic, aesthetic and communal significance and makes a significant contribution to Hampstead Conservation Area and the setting of Fitzjohns Neatherall Conservation Area.

To the east of the church, within Hampstead Conservation Area, is Hampstead Green which is characterised by its meadow grasses and mature trees. On the south-west edge of the green is the cabman's shelter (grade II), a small, unusual inter-war shelter in Modern Movement style. The footpath that runs along the eastern boundary of the green is lined with replica Victorian lamp columns and trees which screen the hospital and access road from view. Collectively, these elements are reminiscent of the earlier appearance of Hampstead and acts as an important and distinctive gateway to the village and heath from the south and east.

Proposals

The scheme by Hopkins Architects would provide a new building adjacent to the hospital on the site of the existing hospital garden and access road on the SE boundary of the Royal Free site. Five storeys high with a double basement, the new building will be clad with aluminium, terracotta and timber with its entrance orientated towards the Green and St Stephens Church. The new building will provide a research facility, patient hotel and improved facilities for the hospital.

Policy

The policies outlined below form the statutory basis on which your authority is duty bound to make its decision unless there are material reasons why this should not be the case.

Section 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas. With regard to listed buildings, it states that the determining authority, 'shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.' And in respect of conservation areas, it requires that 'special attention be paid to the desirability of preserving or enhancing the character or appearance of that area.'

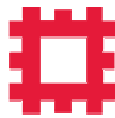
The National Planning Policy Framework (NPPF) sets out the Government's policies



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for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development.

NPPF policy advises that for new development to be sustainable it needs to encompass an economic, social and environmental role, with the latter including the protection and enhancement of the built and historic environment. Paragraph 8 notes that these roles are mutually dependent and should not be taken in isolation; and that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. Paragraph 7 of the NPPF states that the environmental role of a development includes protection and enhancement of the historic environment, while section 12 sets out how the historic environment should be conserved and enhanced.

Paragraph 131 requires that new development make a positive contribution to local character and distinctiveness and paragraph 137 reinforces this stating that new development within the setting of heritage assets should 'enhance or better reveal their significance'. Paragraph 132 states that when considering the impact of a proposed development on a heritage asset, 'great weight' should be given to preserving its significance and paragraph 133 sets out the tests to be met should that harm be substantial. Where the harm is less than substantial, paragraph 134 requires in cases of less than substantial harm, the harm should be weighed against the public benefits of the proposal.

The design of new development should respond to local character and history (paragraph 58 NPPF), should seek to promote or reinforce local distinctiveness (paragraph 60 NPPF) and should address its integration into the historic environment (paragraph 61). Addressing these design policy objectives and others will lead to good design. Poor design that fails to take the opportunities available for improving the character and quality of an area should be refused (paragraph 64 NPPF).

The Revised London Plan, as adopted in July 2011, provides a strategic framework for development in London. This includes key policies related to the safeguarding of London's heritage assets and their settings. Specific policies related to the Athlone House proposal which should be addressed include policy 7.8 (heritage assets) part D (planning decisions) of the London Plan states that 'development affecting heritage assets should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail'.

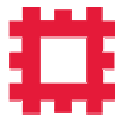
The London Plan also provides policy for implementing the London View Management Framework. Policy 7.8 part D states that 'Development affecting heritage assets and



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their settings should conserve their significance by being sympathetic to their form, scale, materials and architectural detail.'

English Heritage's 'The Setting of Heritage Assets' guidance sets out how we assess the implications of development proposals affecting setting, providing a clear framework for consistent decision-making. It is also intended to assist others involved in managing development that may affect the setting of heritage assets.

DP25 of London Borough of Camden's development policies within its Local Development Framework seeks to protect its heritage and states that it would not permit development that would harm the setting of a listed building or conservation area.

Impact

Development of the scale proposed will impact on the setting of a number of heritage assets including a grade I listed church and two conservation areas. The scheme will significantly alter this part of Hampstead Heath village which contains a high number of listed buildings and is widely recognised for its historic character and appearance.

The architects have sought to respond to the historic environment by following the form of the earlier C19 hospital, reflecting the scale of the church and developing a landscaping scheme which provides screening from the hospital and reflects the wild planting on Hampstead Green. In our view, the height, scale and massing of the proposed development seeks to respect its setting although ultimately, the success of the scheme such as this will depend on the delivery of a detailed design and palette of materials which reflect the original design intentions. Similarly, the quality of the landscaping scheme will be critical to the integration of the building into this sensitive location. We also recognise that the proposed scheme will provide a high quality, modern public face to the hospital which is currently lacking.

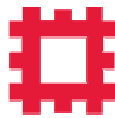
However, the proposed new hospital building will cause some harm to the existing setting of the grade I listed church. The 'village' character and appearance of this part of Hampstead is of aesthetic and historic value and the church and the green are important markers in the transition between Belsize Park and Hampstead Heath village. The presence of a large scale, modern hospital building with immediate street presence will detract from this character and cause some harm to the setting of the grade I church, widely recognised as a local landmark. Whilst the existing 1970s hospital is large in scale, of little architectural merit and causes harm to some views through the conservation area, it is set back from Pond Street and views largely screened from both Haverstock Hill and Hampstead Heath village which has helped to reduce its impact on its immediate vicinity.



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Whilst the scheme would cause harm to the heritage assets identified above, we also recognise that the potential public benefits associated with the scheme are considerable. In respect to the consideration of these benefits, it is acknowledged that there would be significant benefits to the hospital through providing new research facilities (in conjunction with UCL), on site facilities for patients to be monitored overnight on site when undergoing tests (the 'patient hotel') and an overall improved visitor experience by improving catering, parking and other needs, including facilities for the Friends and volunteers.

Section 5 of the planning statement associated with the application seeks to demonstrate that these facilities could not be provided on an alternative site within the Trust's portfolio. Your assessment of the public benefits should also consider the whether other existing services within the Hampstead site could be relocated to other sites within the Trust's administration. Similarly, the funding for the new Pears building should be clearly identified to establish whether the benefits to the hospital facilities could be delivered without the research centre. This would ensure that the benefits are real and cannot be delivered by any other means and enable your Authority to weigh these benefits against the harm, in accordance with the NPPF.

English Heritage welcomes the aspiration of the Trust to work more closely with St Stephen's regarding the promotion of local heritage as identified in section 14 of its heritage statement. We remain of the firm view that specific heritage benefits are critical, bringing benefits to the hospital, the community and the historic environment. We strongly urge your authority to give specific heritage benefits the highest consideration in your assessment of this application and that these be secured through the S106 agreement. We would be happy to advise further on initiatives which could secure mutually-beneficial outcomes for the hospital Trust and the historic built environment.

If you are minded to grant permission for this scheme, we strongly recommend a condition be attached which seeks to protect the historic fabric of the grade I listed church during construction including survey, monitoring and if necessary, appropriate repair. Whilst we note that the Construction Management Plan associated with the application makes reference to this, a specific condition must be attached to ensure that this highly significant designated heritage asset is adequately protected.

Recommendation

Based on the information provided to English Heritage to date, it is our view that the proposed scheme will cause some harm to the setting of heritage assets including the grade I listed church of St Stephen, Rosslyn Hill and Hampstead Conservation Area. We acknowledge that the scheme represents a considered response to the site and is potentially of high quality. We also understand that there are potentially significant



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public benefits associated with this scheme which will need to be considered by you as part of your overall assessment of this scheme. Should you be minded to grant consent, we strongly recommend that conditions are attached to secure the historic fabric of the church during construction and ensure that specific heritage benefits can be delivered as part of any associated agreed legal agreement.

Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).

Yours sincerely

Breda Daly

Inspector of Historic Buildings and Areas

E-mail: breda.daly@english-heritage.org.uk

cc Michael Taylor, St Stephen's Rosslyn Hill



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