



BLOOMSBURY
CONSERVATION AREAS
Advisory Committee

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The Mayor of London
City Hall
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Appeal to the Mayor to direct the London Borough of Camden to reject the proposed developments at 256 Gray's Inn Road, involving the demolition of the courtyard of the former Royal Free Hospital.

The BCAAC is the advisory committee for all developments in Camden occurring within conservation areas south of Euston Road, with the exception of Hatton Garden. We write concerning the redevelopment of the Eastman Dental Hospital and former Royal Free Hospital, at 256 Gray's Inn Road.

The site falls within the eastern border of the Bloomsbury Conservation Area. The buildings concerned are all positive contributors, and the Eastman Dental Hospital itself is Grade II listed, whilst the Lord Riddell Fountain within the courtyard of the quadrangle of the former Royal Free Hospital is Grade II listed.

We are surprised to find that this application has been so far approved by the local authority's planning department and committee, as this development pays little regard to the special character of our conservation area and its significant heritage assets. We write to appeal to you to direct the London Borough of Camden to reject this application, on the grounds that it clearly and significantly contradicts paragraph 195 of the NPPF, along with further policies contained within the London Plan which we will not list here.

The proposed building is also clearly of a scale disproportionate to the surrounding area and its approval would set a dangerous precedent for overdevelopment in the area.

The site comprises the Eastman Dental Hospital (EDH) to the south, and the former Royal Free Hospital (RFH) to the north. We have no concerns to raise about the proposals for the EDH, but strongly object to the proposed redevelopment of the RFH.

Significance of Heritage Assets and Substantiality of Harm

A core consideration in determining applications is the substantiality of harm caused to heritage assets, and the significance of those heritage assets.

The Bloomsbury Conservation Area is a conservation area of national significance, being originally designated in 1968. The RFH makes a strong positive contribution to the civic and institutional character of the Bloomsbury Conservation Area, as confirmed

by Historic England during this application. It was assessed that the quadrangle plan and classical façades made a strong positive contribution to the special character of the conservation area, and that demolition of any part of the quadrangle would cause 'significant', and therefore substantial harm to the conservation area. This was highlighted at an early stage.

It was also assessed that the scale of the proposed building would cause harm to the streetscape by detracting from the commanding nature of the façade of the RFH, and that the harm caused by the development would most likely require a redrawing of the conservation area boundary.

An alternative option was offered which preserved the quadrangle plan which was supported by both us and Historic England, but which was discarded by the developers.

During the formal consultation, Historic England expressed '*significant concerns*' about the loss of the RFH hospital quadrangle, describing it as being of '*major local interest*' and '*of strong townscape value*'. Historic England described the classical quadrangle as being '*recognisable and characteristic of other charitable institutions in London... all of which are statutory listed buildings.*' The response further states that '*The proposed development would erode the authenticity of the hospital complex by demolishing all elements behind, and erecting a large and visually prominent building that disregards the historic courtyard arrangement and scale of its buildings.*'

The BCAAC fully agrees with the assessment of Historic England that the development would cause **substantial harm** to the Bloomsbury Conservation Area and the setting of its listed buildings, heritage assets of high significance. It is evident that the development involves **total loss** of part of the RFH, a strong positive contributor to the Bloomsbury Conservation Area.

Despite this, it must be noted that the planning officer has claimed the harm to be 'less than substantial'. Such an assertion ought to be seriously questioned when it contradicts the opinion of both us and Historic England.

National Planning Policy Framework

We would like to now draw your attention to Paragraph 195 of the NPPF which explores when substantial harm or total loss of a designated heritage asset can be permitted. It states that '*local planning authorities should **refuse consent**, unless it can be demonstrated that the substantial harm or total loss is **necessary** to achieve substantial public benefit, that outweighs that harm or loss.*'

The public benefits of the proposal are evident. However the applicant has not demonstrated that the substantial harm and partial loss of heritage assets are **necessary** to achieve this public benefit, simply instead contradicting our assessment and that of Historic England, to state that the harm caused to heritage assets is less than substantial or non-existent.

The fact that an alternative was offered which did not involve the demolition of the courtyard is strong evidence that the demolition is **unnecessary** to achieve the proposed public benefits. Thus in line with 195 of the NPPF this application should be rejected.

We would expect clear and convincing justification for the demolition of the quadrangle and replacement with a negative contributor to the Conservation Area, along with demonstration that this demolition is necessary to achieve substantial public benefit. We can find neither in the application. On this point alone, we recommend that the Mayor direct the London Borough of Camden to reject this application.

Yours Sincerely,



Owen Ward