

Great Ormond Street Group

Sunday 19 June 2022

Patrick Marfleet
Senior Planning Officer
Camden Council
5 Pancras Square
London
N1C 4AG

Dear Mr Marfleet,

Planning Application 2022/2255

I am writing on behalf of the Great Ormond Street Group ("GOSG") which comprises a newly formed group of local residents and businesses specifically established to address concerns regarding the proposed construction and development of the new phase of Great Ormond Street Hospital ("GOSH"). The group comprises members directly affected by this development from Great Ormond Street, Queen Square, Gray's Inn Road, Rugby Street and Lambs Conduit Street. We expect further members to join over the course of the consultation.

By way of background, GOSG has only recently become aware of the above planning application 2022/2255, i.e. the proposed demolition and replacement of the existing Great Ormond Street Hospital (GOSH) Frontage Building. It is deeply shocking that a group such as ours have collectively and individually not been engaged on the proposals and indeed, not one person in the group saw any consultation documentation until recently. Given that we have only now been made aware of this information, we have not had the time to carry out a comprehensive review. In the circumstances, GOSG reserve the right to make further submissions once we have had the opportunity to review all the representations in detail including, where necessary, consultation(s) with independent experts.

It goes without saying that GOSG hugely admire and support the work of GOSH however this support cannot be without qualification if the decisions proposed adversely and detrimentally affect the social and economic fabric of the area.

We unanimously and vociferously object to the granting of this planning application. The reasons are set out below and include without limitation the following:

1.0 GOSH Consultation Engagement 25/02/2022

GOSH's "Statement of Community Engagement" dated 25/02/2022 states that the consultation has been "**comprehensive**" and has taken place over five years¹.

This statement is fundamentally incorrect. GOSH's community consultation process has been totally inadequate and has lacked any genuine attempt to engage the community

on any level as is demonstrated by the complete lack of knowledge of the GOSH proposal within the wider community. This can be demonstrated as follows:

1.1 Residents unaware of the plans until mid-June 2022

A large number of local residents only discovered details of this proposed development in early to mid June 2022. On making further enquiries, it is increasingly clear that a considerable number of additional residents remain blissfully ignorant even today.

GOSH have failed to engage with the community on any meaningful level or made any reasonable attempt to ensure that a proper and comprehensive consultation has been conducted. It is our position that GOSH has done as little as possible, trying to tick boxes without raising community awareness in the hope that the plan will gain approval under the radar.

1.2 GOSH claims of wide community engagement are not credible

In GOSH's "Statement of Community Engagement", GOSH claims that it successfully engaged in a comprehensive consultation of local residents.

The evidence does not support this for the following reasons:

- a) It is clear from a meeting of the GOSG on 19 June 2022 that the vast majority of residents had no knowledge whatsoever of the development until mid-June 2022.
- b) It is clear from a meeting of the GOSG on 19 June 2022 that the vast majority of residents have not received any direct mail or seen any consultation documentation in the local area.
- c) By GOSH's own admission², of the two site visits planned for residents, one was attended by no residents at all, and one by only one resident. This clearly demonstrates that little or no effort has been made to engage the community in the plans.
- d) By GOSH's own admission³, only 17 responses were ever received from residents and a much larger quantum was expected given the huge negative effects such a development would have on many hundreds of residents and businesses in the local area. Its impact is devastating for many families and businesses alike, particularly after the devastation caused by the pandemic.
- e) By GOSH's own admission⁴, there were only 432 page views of the GOSH planning application Web Site at the date of submission, despite the fact that hundreds of page views would have been generated by GOSH themselves plus Search Engine Robots (which will typically re-check a web site several times per day).
- f) By GOSH's own admission⁵, of the two live webinars an average only 10 individuals attended per seminar, many of whom (and potentially all) were likely GOSH staff.
- g) Recent resident requests for further information to GOSH's planning email (ccc@gosh.nhs.uk) on the planning application (e.g. details of the plant specifications planned for the upper and lower floors) have been left unanswered with not even an acknowledgement of receipt.

- h) GOSH did not publish full details of the development on the local Neighborhood.co.uk site despite the site's local popularity.

Given the vast number of residents who would be affected negatively by these proposals if approved, the low levels of awareness and resulting lack of participation demonstrate a catastrophic and undeniable failure to ensure a proper, comprehensive or effective consultation.

Further, to the degree that GOSH did receive feedback from residents (which is outlined in section 4.1 of GOSH's Statement of Community Engagement), it is clear that rather than attempting to engage in discussion or modify their plans or designs to accommodate community concerns, GOSH have simply and unilaterally stated that they do not wish to make any changes to the programme which demonstrates further bad faith.

As such, GOSH have manifestly failed to adhere to the key principles of community engagement; Consultation, Communication, and Collaboration resulting in a failure to engage the local community on any meaningful level. As such, the consultation is woefully inadequate and GOSH has failed to meet its obligations thereunder.

1.3 Admission of Failure to Key Stakeholders

Queen Square Gardens (QSG), which owns the gardens of Queen Square, is one of the largest freeholders in the area. Despite a GOSH representative being on the Board of Trustees of QSG, the Chairman of the Board had no knowledge of the plans whatsoever until early June 2022.

GOSH's Trustee and Representative, Paul Mills of GOSH, deliberately omitted to mention plans for a new building prior to the application being submitted. Instead, on 7 June 2022, he wrote to the Chairman of the Board of QSG to "apologise if you feel I should have provided you and the other Trustees with more information about the development before the planning application was submitted".

In the same correspondence Mills states GOSH has additional elements planned on top of what is in the planning application, (including "Changes to Great Ormond Street" and some form of "Linking" to Queen Square) but states these "**have been deliberately excluded from the planning application.**"

These admissions are deeply worrying on a number of levels. GOSH has deliberately misled stakeholders as to the true nature and extent of its plans further demonstrating the underhand approach devised to ensure minimum community engagement and minimum opposition to the development proposals.

1.4 GOSH suspension of Residents Panel prevented proper engagement

For over twenty years GOSH has run a Residents' Liaison Group (RLG), to discuss the hospital's plans and ensure good community relations.

By GOSH's own admission⁶, once the Residents' Liaison Group (RLG) was given initial details of the proposals, it repeatedly raised serious concerns about the development including the nature and size of the building, the air conditioning mechanism and the volume of construction traffic that will be created and the danger and environmental damage that will be caused to the community residents and businesses alike.

The Residents' Liaison Group (RLG) repeatedly recommended that a route "**could be created from the main service yard to Powis Place**" to minimise construction traffic which would allow lorries to enter from Guildford Street (which is a B-Road) rather than

travelling along Guildford Place, Great Ormond Street and exiting via Boswell Street. GOSH by its own admission⁶ wilfully refused to consider this option without explanation as to why save that a small number of consulting rooms would no longer be accessible. This is utterly unacceptable given the catastrophic and lasting impact that this development will have on the lives of the GOSG. GOSH's failure to engage on this matter further demonstrates its wilful disregard for the community that has always supported it.

GOSH admits that following RLG's representations, GOSH's involvement in the RLG meetings was then "**paused**". GOSH claim that this was because it did not have "**spare resources**" to "**administer the meetings due to pressure on the hospital from COVID**".

Given that GOSH has a budget of over £200m for the proposed construction and that it was continuing to engage with local politicians, staff, development and construction partners and Camden Council, it seems highly questionable that the only form of consultation that needed to be paused "because of COVID" would be consultation with the long standing local resident group that was requesting reasonable changes to the development plans.

When COVID restrictions were lifted, the RLG meetings remained "**paused**" however GOSH managed to continue to prepare all other elements of the planning application.

It would therefore appear that the real explanation for GOSH's decision to "**pause**" the RLG meetings is so that GOSH did not have to listen or engage with the local community or properly consider or adopt the changes that would be required to gain local community support.

GOSH's decision to continue to blame the suspension of RLG meetings on COVID casts doubt on GOSH's motives and transparency in compliance with the Statement of Community Engagement, or indeed, in any of the other documents attached to the Planning Application.

This serves to further demonstrate that GOSH has manifestly failed to act in good faith during the consultation process.

2.0 Camden Consultation has also been Defective

Camden's Statement of Community Involvement⁸ sets out Camden Council's Policy on ensuring successful community engagement and awareness pre-application and post-application.

Camden Council states, "**Our Statement of Community Involvement (SCI) sets out how we will involve local people, local businesses and other key organisations and stakeholders when we prepare our planning policies and consider planning applications**".⁹

Camden Council has failed to adhere to its own policy in considering this particular application.

2.1 Failure to hold Development Forum

Camden states¹⁰ it will run a Development Forum (a public meeting) organised by the Council at the pre-application stage to bring together interested parties to comment on

planning proposals for “**major schemes**” or those “**likely to be of significant local interest.**”

This scheme clearly qualifies under both criteria.

GOSG is not aware of any Development Forum which is a compulsory requirement before any planning application is submitted, considered, or approved. If such a forum exists, the residents and businesses are not aware of its existence.

2.2 Failure to Publish Proper Notices

For a major development Camden policy¹¹ is that one or more notices **must** be installed on each of the streets around a proposed major development.

On a thorough scope of the area, we have only discovered two notices in proximity to the development. There are no notices whatsoever in other proximate areas including Queen Square, Powis Place, Guildford Street and Orde Hall Street. This failure to adhere to the requirements of the statutory notice is without question one of the reasons why so few members of the local community have had the opportunity to find out about, and/or comment or input on the proposed plans.

It is the policy of Camden Council that photographs of notices placed in the surrounding streets are also to be made available under the planning documents on the Council's website¹¹.

These are not available.

Camden have stated that they have published ten notices but there is currently no evidence of this. We have written to Camden⁷ requesting details of where notices were placed but as of today's date received no response.

Residents have visited all the roads close to the proposed development on 19 June 2022 and failed to find the required notices.

2.3 Effect of Defective Community Involvement

As Camden Council has manifestly and evidently failed to adhere to its policy on community involvement in considering this application, the application must be rejected and a new consultation commenced.

3.0 Designs not appropriate for Bloomsbury Conservation Area and Contrary to LVMF-scheduled London Panorama view from Primrose Hill

The development is not in keeping with the local area and the plans clearly fail to consider the impact that it will have on the Bloomsbury Conservation Area.

It is entirely inappropriate to build a new ten storey building opposite three storey heritage buildings on a small residential street which already by GOSH CEO Matthew Shaw's own admission is already “**busy**”, “**polluted**” and “**congested**”¹²

This proposal will rob many local residents and businesses of natural light – forever - and will instead force them to continually leave their lights on a permanent basis, even during the day.

In doing so, the residents' quality of life will be destroyed, and the environmental, physical, financial and psychological affects will for some be life changing.

3.1 Negative Effects on Bloomsbury Conservation Area

Whilst many residents have written to the council about the development, the confirmation of the proposed development's inappropriate design is perhaps best summed up by Historic England, which states of the proposal, in their submission,

"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"¹³.

It notes that the proposed redevelopment of the Frontage Building of Great Ormond Street would unfortunately **"be a major transformation of the street and its upper levels"**¹³ which would do irrevocable damage to the area.

3.2 Contrary to LVMF-scheduled London Panorama view from Primrose Hill

Heritage England also notes the **"small but important impact"**¹³ of the proposal in the **"LVMF-scheduled London Panorama view from Primrose Hill, and centrally within its Landmark Viewing Corridor (LVC) to St Paul's Cathedral"**¹³ and notes it breaches the agreeable threshold of 56-58m for this corridor¹³.

In other words, the proposals are not appropriate for a conservation area, nor are they in keeping with the public policy on maintaining good views of St Paul's Cathedral from key areas of London.

For these reasons alone, the current plans must be rejected.

Given the nature of the Conservation Area and the importance of light, we say the at very most, any new building should be no higher than the current building.

4.0 Defective Noise Impact Assessment

Given the significant noise pollution that can be generated by hospital buildings, the site's location in a residential area, and existing known problems, the GOSH "Noise Impact Assessment Report" is a critical document in GOSH's submission.

4.1 Requirements of Camden Local Plan 2017

Camden Local Plan 2017¹⁷ states that it will **"only grant permission for noise generating development, including any plant and machinery, if it can be operated without causing harm to amenity"** and notes **"Developments proposing plant, ventilation, air extraction or conditioning equipment and flues will need to provide the system's technical specifications to the Council accompanying any acoustic report."**

As such, an application must only be granted if (a) it can be operated without causing harm to the amenity and (b) if full specifications are provided and then the effects independently verified by Camden.

4.2 Failure to provide Air Conditioning Specifications

GOSH's Noise Impact Assessment does not provide a detailed specification of the equipment to be installed in either the 6th floor or lower ground areas of the development.

This is despite this Camden requiring that, "***Developments proposing plant, ventilation, air extraction or conditioning equipment and flues will need to provide the system's technical specifications to the Council accompanying any acoustic report.***"

We have asked GOSH for details of the specification of the units directly by email¹⁴ so we can review this independently. However, they have to date refused to provide these specifications.

The lack of a detailed specification in GOSH's application and report means the application is defective and must automatically be rejected.

4.3 Failure to consider Known Audio Problems in considering background noise

The report fails to acknowledge that there are existing known problems with excessive noise generated by hospital infrastructure, notably:

- a) The "temporary" MRI Scanner truck on Queen Square
- b) The "temporary" CT Scanner truck on Queen Square
- c) The new Air Conditioning Units in the Barclay House hospital building

These installations are definitively damaging to the local area in that they are all delivering **significantly** more than +10 dB or more of sound than the background sound (which is the appropriate test under British Standard 4142)¹⁵.

Whilst these issues have at the present time yet to be addressed, they will have to be addressed in the future.

Once they are addressed, this will reduce the amount of ambient noise in the area, which will lead to the data in the GOSH Noise Impact Assessment and modelling being inaccurate.

As such, the report and conclusions are defective and so the application must be rejected.

4.3 Failure to consider Neighbours at 6th floor levels with direct line-of-sight

GOSH's proposed building design requires air conditioning units to be installed at lower ground and 6th floor level.

However, the Noise Impact Assessment and modelling states it **only** considers the effects on "***nearby Noise Sensitive Receptors (NSRs)***" all of which are on lower floors (3rd or 4th floor)¹⁶

As such, and by GOSH's own admission, the report fails to consider or quantify the effect of residents in buildings such as in particular the council housing at Chancellor's Court or many other buildings in the Tybalds Close Estate which have residents the same level as the proposed air conditioning units, and who will therefore be materially affected because of a **direct line of sight**.

As such, the report is defective, and the application must be reconsidered to ensure compliance.

5.0 Defective Proposals for Demolition & Construction

Camden's Local Plan 2017¹⁷ states it will "***seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.***"

GOSH's Demolition & Construction Plan does nothing to minimise the impact on the local amenity. Indeed, in many ways, it is difficult to see how the plan could not have more of an impact on residents and businesses – and for almost five years.

Residents have recommended that construction traffic could enter by creating a route from the main service yard on Guildford Street (a B-Road) to Powis Place.

GOSH have **admitted this is possible**¹⁸, but state they prefer not to do this because it would involve, "***a loss of inpatient beds, consulting rooms, treatment rooms and the loss of fire escape rooms***" as well as a "***impacts on the National Hospital***"¹⁸

However, given it is a requirement of Camden's Local Plan 2017 to "***minimise the impact on local amenity from deliveries and from the demolition and construction phases of development***"¹⁷ and that the current plans are hugely disruptive on local residents and commercial premises. Camden Council has a responsibility to consider this alternative routing, and likely insisting on it, even if GOSH have failed to do so properly.

5.1 Impact on local amenity / residents / commercial premises

GOSH's proposals would have a hugely detrimental effect on the local community. With 3 to 6 lorries passing up the small residential streets of Lamb Conduit Street and Great Ormond Street every hour for many years, road closures, and one-way systems the local community fears:

- a) Housing in many of these streets will be blighted, potentially to the degree of these homes being uninhabitable for years.
- b) Commercial premises especially hospitality venues will lose much of their trade, and will potentially go out of business.
- c) Overcrowding of the pavement on Great Ormond Street will make it dangerous for residents, especially children, given the quantity of trucks passing down every day.
- d) Diners and drinkers outside the pubs, cafes and restaurants of Lamb Conduit Street (which often spill out onto the road because the pavements are overcrowded) could be at risk from a Health & Safety Perspective, and we have already seen so many tragic deaths caused by lorries in Holborn.
- e) Safe cycling routes that are currently relied upon by many will no longer be available.
- f) Twelve trees will be cut down unnecessarily.
- g) In the event of a blockage on **any** of the roads in the one way system due to an accident or break down, the nature of the one way system will mean all the local roads will snarl up with lorries, ambulances and other vehicles - and ambulances and trucks will be left unable to get to the hospital. Further, with

any blockage it will be impossible for emergency services (police, fire or ambulance) to easily attend any incidents.

Given these very grave concerns, GOSH is urged to reconsider the alternative access options.

If their objection is that they need to rent some additional space nearby (perhaps in the recently refurbished hospital in Queen Square) so that they can replace the consulting rooms or other rooms they would temporarily lose during the works then surely that is a small price to pay to ensure the scheme can get community support, and be safe.

For all the above reasons, and many others, we believe Camden must make it a condition that any scheme does "**minimise the impact on local amenity from deliveries and from the demolition and construction phases of development**" as this is required by the Local Plan by ensuring access is gained from Guildford Street, and not the small and already overcrowded and over polluted residential road that is Great Ormond Street.

6.0 Building the right hospital for London's children

Matthew Shaw, the CEO of Great Ormond Street was recently quoted in GOSH's own Press Materials¹² saying:

"We see every day the impact that the busy, polluted road on our front doorstep has on our patients, families and staff. Our doctors and nurses treat children with a range of severe respiratory conditions, but on their way into the hospital that is supposed to make them better, patients are exposed to filthy air which is exacerbating their illnesses. Children should be able to come to hospital, and play outside, without being exposed to air so polluted it's not considered safe."

We believe this statement gets to the crux of the real issue here.

GOSH has completely outgrown the small residential street that is Great Ormond Street.

When GOSH arrived in Great Ormond Street in 1852 it opened with just 10 beds in a small 3 storey building²⁰

It is now a world-renowned institution accepting patients from the world over.

Rather than try and build a new ten storey building in the middle of a small residential road in a Conservation Area, and in the process disrupt and destroy the lives of residents as well as cut off views of St Paul's cathedral from Primrose Hill and cripple many local businesses, surely it is time for GOSH to consider an entirely new site?

A single integrated purpose-built building - perhaps even in a location like Stratford where GOSH could offer expansive gardens and playgrounds and fresh air for the children to enjoy without constant traffic congestion and filthy air. As GOSH is no doubt aware, the increased construction dust and environmental damage caused by the construction will create additional problems for children with respiratory illnesses.

We would commend GOSH to at least consider alternative locations for its future or at least remove the clinical site and keep consulting rooms and administration in its current site.

Whilst we residents would be sad to see GOSH change its current use, the decision on future infrastructure investments should surely be about delivering the best possible care to children rather some romantic and outdated attachment to being located in the small residential road that GOSH was originally named after.

Conclusion

For all the above reasons, we urge Camden to:

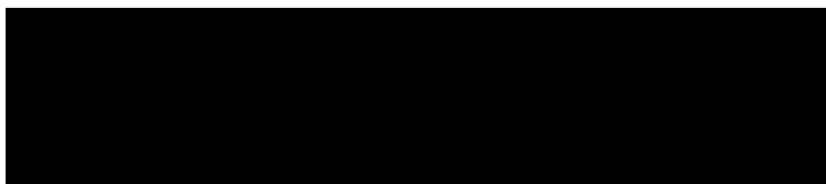
- a) Commence a proper and open Consultation (as the current attempt has been defective).
- b) Commence a Development Forum with local residents (as required under the council's planning regulations).
- c) Request GOSH submit revised plans which use the alternative and less disruptive access route proposed.
- d) Request GOSH submit revised plans which are in keeping with the Conservation Area and so no taller than the current premises and which do not disrupt protected views of St Paul's.
- e) Request GOSH submit revised plans which minimise noise pollution by placing plant below ground and ensuring noise mitigation is included as part of the application.
- f) Request GOSH submit revised plans which include a detailed specification of any proposed plant as required under planning regulations, so a third party expert can properly review the proposals.
- g) Request GOSH submit revised plans which include a proper and accurate simulation of likely noise pollution as required under planning regulations.

Finally, we urge Camden to urge GOSH to meaningfully **consider** the opportunity for GOSH to be reborn on a single new purpose site well away from Great Ormond Street, so children and their families can experience better care, well away from the congestion, pollution and other difficulties that will always be experienced in such a non-optimal location.

The GOSG expressly reserve the right to add to this submission during the consultation process.

We look forward to hearing from you and would welcome a face to face meeting.

Best Regards,



Sources as below:

1 Paragraph 3 of page 3 of GOSH ""Statement of Community Engagement" dated 25/02/2022

- 2 Sections 4.27 and 4.28 of GOSH ""Statement of Community Engagement" dated 25/02/2022
- 3 Section 5.1 of GOSH ""Statement of Community Engagement" dated 25/02/2022
- 4 Section 1.9 of GOSH ""Statement of Community Engagement" dated 25/02/2022
- 5 Section 4.23 of GOSH ""Statement of Community Engagement" dated 25/02/2022
- 6 3.39 to 3.43 of GOSH ""Statement of Community Engagement" dated 25/02/2022
- 7 Emails on 16th and 17th June 2022 to Camden Council (available on request)
- 8 Camden "Statement of Community Involvement" available at:
<https://www.camden.gov.uk/documents/20142/3912524/statement+of+community+involvement.pdf/e513838e-f1b4-3390-0961-33d1f86c73bd>
- 9 See section 1.1 of Camden "Statement of Community Involvement"
- 10 Section 3.12 of Camden "Statement of Community Involvement"
- 11 Section 3.29 of Camden "Statement of Community Involvement"
- 12 <https://www.gosh.nhs.uk/news/mayor-of-london-joins-patients-as-play-street-comes-to-gosh/>
- 13 <http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/9632407/file/document?inline>
- 14 Email from Rob Lewis to GOSH on 17 June 2022
- 15 Section 3.3 of GOSH "Noise Impact Assessment"
- 16 Section 2.2 of GOSH "Noise Impact Assessment"
- 17 <https://www.camden.gov.uk/documents/20142/3912524/Local+Plan+Low+Res.pdf/54bd0f8c-c737-b10d-b140-756e8beeae95>
- 18 Page 24 "Vehicular Access" response of GOSH ""Statement of Community Engagement"
- 19 Section 7.9 GOSH "Demolition & Management Plan"
- 20 <https://www.gosh.org/about-us/our-history/>