

## **Introduction**

- 1.1 This response has been prepared by Turley Heritage and BDP to respond to the following heritage consultees responses:
- The Society for the Protection of Ancient Buildings (the SPAB) – 13<sup>th</sup> June 2022;
  - The Georgian Group – 13<sup>th</sup> July 2022; and
  - Bloomsbury Conservation Areas Advisory Committee (CAAC) – 31<sup>st</sup> July 2022.
- 1.2 The applicant is preparing further information and additional material to respond to Historic England's detailed representations of 10<sup>th</sup> June, which is contained within the Built Heritage, Townscape and Visual Addendum Report. This also includes a commentary from BDP specifically on design related points.

## **Summary of Heritage Representations**

- 1.3 It is understood, from a review of the representations from these heritage stakeholders, that there was no comment on the applicant's understanding of the heritage assets' significance, including the contribution made by setting (and the Site) to that significance. Moreover, there seems to be broad agreement that the existing buildings within the Site proposed for demolition do not contribute positively to the significance of the relevant built heritage assets. It is also acknowledged that that the redevelopment of the Site provides the opportunity to deliver a new facility to support the applicant's track-record of exceptional medical care for sick and vulnerable children.
- 1.4 All three statutory consultees highlighted the scale of the proposed development as a reason for their objection, asserting that this would harm both the character and appearance of the Bloomsbury Conservation Area, as well as the significance of a number of statutorily listed buildings on the south side of Great Ormond Street.
- 1.5 The Bloomsbury CAAC also cited poor design as causing harm to the conservation area and surrounding listed buildings. As set out above, BDP Architects will be considering this matter further in the design response document which is appended to the Addendum HTVIA..
- 1.6 In addition, the SPAB also raised concerns that the use of the listed buildings, on the south side of Great Ormond Street would be constrained, due to the reduction in access to natural daylight by the proposed development.

## **Response to Heritage Representations**

### **Impact of Scale**

- 1.7 Consideration of perceived impacts on the significance of heritage assets is a matter of professional judgement. The submitted HTVIA provides a considered and robust assessment of potential heritage impacts on the significance of the relevant built heritage assets.

- 1.8 There is an existing distinct and established contrast in scale and character between the traditional, domestic, historic, terraced houses and the institutional buildings of Great Ormond Street Hospital. This is an established part of both the character and appearance of the Bloomsbury Conservation Area and the setting of the identified listed buildings. The overall height and scale of the proposed development will be greater than the existing Frontage Building, however, it is not dissimilar to the height of the Morgan Stanley building to the north.
- 1.9 The overall visual impact of the increased height in the local context would be well-contained, given the tight nature of the street pattern and associated degree of enclosure. This is demonstrated in Representative Views 1 and 2 (located within the adjacent Sub Area 10) and Representative Views 3, 4 and 6 (located within Sub Area 11). In these views, the proposed development will be experienced in the context of the existing urban built environment, with its scale, architectural articulation and material palate positively responding and integrating it into the surrounding historic townscape.
- 1.10 In terms of the listed buildings along Great Ormond Street, the proposed development would not affect the positively contributing elements of the group's setting, namely the underlying historic street pattern – which reinforces an understanding of the iterative pattern of development – an appreciation of the strong cohesive, domestic character and group value of the eastern end of Great Ormond Street and the wider context of contemporaneous development along Lamb's Conduit Street, Queen Square and the eastly continuation of Great Ormond Street.
- 1.11 In their Stage 1 report<sup>1</sup>, the Greater London Authority ('GLA') concluded their assessment on the impacts of the proposed development on the significance of the relevant built heritage assets:
- "GLA officers have reviewed the HTVIA and associated verified views that illustrate the proposals impact upon both the character of the BCA and setting of nearby listed buildings. Officers agree that the existing building on the site does not make a positive contribution to the character of the BCA. With regards to impact of the proposed new building upon heritage assets, GLA officers have formed the view that although the proposed building is of significantly greater scale, the high quality architecture along with the proposed colour pallet and landscaping will result in a development that sits more comfortably within its historic setting than the existing building. As such, it is the view that the proposal will have a positive impact upon the character of the BCA and will not result in harm to the significance and setting of any nearby heritage assets. As such, the proposal is in accordance with Policy HC1 of the London Plan and the NPPF."*
- 1.12 Accordingly, the GLA's assessment of the impacts of the proposed development on the significance of the relevant built heritage assets is consistent with the submitted HTVIA.

---

<sup>1</sup> Planning report GLA/2022/0405/S1/01 (dated 4<sup>th</sup> July 2022)

### **Residential Amenity**

- 1.13 Planning policy and best practice advice confirms that, in addition to the desirability of preserving and enhancing the significance of heritage assets, local planning authorities should take account of putting them to viable uses consistent with their conservation.<sup>2</sup>
- 1.14 The residential use of the listed buildings on Great Ormond Street contributes to their heritage significance. In heritage terms,, it does not mean that *any* reduction in residential amenity for the occupiers of these listed buildings would result in an automatic adverse impact on heritage significance as they are still able to be used for their primary purpose.
- 1.15 In terms of the proposed development, paragraph 7.8 of the Daylight and Sunlight Report (20<sup>th</sup> May 2022), prepared by Avison Young, concluded:
- "In terms of sunlight, the vast majority of windows facing the Site are north-west facing and are not orientated within ninety degrees due south, and therefore are not considered relevant for assessment. A small minority of windows may experience a noticeable alteration, nonetheless, these are generally minor in nature and the existing levels already fall short of the BRE Guidelines recommendations."*
- 1.16 In those terms, the proposed development would fall far short of prejudicing the residential use of the listed buildings and, therefore, on that basis, is not considered to adversely impact on their overall heritage significance.

### **Summary of Design Representations**

- 1.17 Design comments were received from the Bloomsbury Conservation Area Advisory Committee who noted their objection on the basis of excessive scale and poor design. Although they noted that *"it is recognised by some members of the committee that attention has been paid to the general materiality, massing, and roofscape features of the conservation area's distinctive domestic and institutional buildings. This is reflected in solid-to-void ratios, the use of brick panels, large expressed chimneys, 'bay windows', and chimneys."*
- 1.18 The Committee also noted that the *"building is of an exceptionally poor character, and would appear highly unusual and discordant in any setting."* They also considered it would appear *"to be a 'Frankenstein' of different architectural elements found throughout the conservation area at different periods in its development."* Other points made related to the *"chimneys for example, are of such a small scale compared to the building below they appear to be 'stuck on' rather than integral to the building itself."* Final points were made about the *"large, horizontal, silver element sitting across the top of the building is considered to be especially poor in terms of design."*

### **Response to Design Representations**

- 1.19 Within the Design and Access Statement (DAS) submitted with the planning application, all of the above points have been addressed at:

---

<sup>2</sup> National Planning Policy Framework (NPPF) (2021), Paragraph 197.

- Section 2: The Site starting on page 9 of the DAS
- Characterisation study, Appendix 7.4 in the DAS
- Section 3: Design Strategy and Evolution starting on page 27 of the DAS
- Townscape views on pages 58-59 of the DAS
- The Garden Pavilion narrative on page 74 of the DAS

1.20 We deal with each of the points below.

1.21 **Character:** The proposed development has been influenced by a characterisation study which is contained as an Appendix, Chapter 7.4, in the DAS. The characterisation study was presented to LBC at a number of early pre-application meetings and formed an important part of the design evolution. An understanding of the Site is also captured within Chapter 2 of the DAS. House bay proposals were developed in response to this analysis which is reflected in solid to void ratios, brick panels, expressed chimneys and bay windows as acknowledged. Likewise, the expression of the horizontal and balconies responds to features of adjacent institutional buildings and hospital buildings where a connection to external spaces can be demonstrated as a feature of the development of the GOSH campus.

1.22 **Different architectural elements:** An intentional strategy introduced was to define house and balconies that respond to functional clinical bedroom clusters and the provision of external amenity space for the staff, children, young people and families that use the hospital. This provides variation along the length of the Frontage Site and breaks up the building's massing on the street. The expression of consistent horizontal banding in the elevations tie the house and garden bays together as well as the use of a consistent material palette.

1.23 **Proportion:** The scale of proposed chimneys is comparable with those at the neighbouring Homeopathic Hospital building. The designs have been developed through testing options in realistic views from street level and on the basis that the façade will usually be perceived obliquely, in which case the depth of the chimneys is perceived giving them more body. This is demonstrated in Townscape views of the proposals within the DAS. The proportion of window openings has been tested iteratively against neighbouring buildings and through pre-application engagement. A selection of these studies can be viewed within Chapter 3 of the DAS.

1.24 **Roofscape:** Conceived of as a garden pavilion and expressed in buff tones with a series of vertical fins to set it apart from the building's primary massing and to break up its scale along the length of the street. Chimneys that relate to the geometries and material of the 'houses' below provide vertical breaks along the length of 'garden pavilion'. Louvred panels adjacent to chimneys and at high level provide a further level of variation. This intentionally simple approach has been taken to help the roof massing appear lighter and recessive. This is reinforced by its physical set back from the primary façade which reduces its presence from the street.