

**Great Ormond Street Hospital Children's  
Cancer Centre (GOSH CCC)**  
Consultation Response and Resubmission Report

October 2022

# Contents

1.	List of Resubmission Documents	3
2.	Revisions to the Application Red Line Boundary	4
3.	Design Revisions	5
4.	Revisions and Updates to Other Supporting Reports	6
5.	Responses to Statutory Consultation Comments	9
Appendix 1: Heritage Response to Statutory Consultees (excluding Historic England) (October 2022)		11
Appendix 2: Thames Water Comments - Applicant Responses (October 2022)		12
Appendix 3: Plan GOSHCCC-BDP-ZZ-ZZ-DR-S-1000-3996 - Relationship Between Proposed New Works and Thames Water Public Sewer Water Mains		13
Appendix 4: Great Ormond Street Hospital Drainage Strategy Report (April 2022)		14

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# 1. List of Resubmission Documents

- 1.1 This report sets out the Applicant's response to the consultation comments received from members of the public, local amenity groups and statutory consultees pursuant to full planning application Ref. 2022/2255/P validated by the London Borough of Camden (LB Camden) on the 25 May 2022, for the proposed redevelopment of the Great Ormond Street Hospital frontage building comprising a new children's cancer centre.
- 1.2 The supporting documents enclosed within this re-submission pack for consideration are as follows:

## Revised Supporting Documents

- Redline Site Location Plan as Existing - Drawing GOSHCCC-BDP-ZZ-ZZ-DR-A-2000-1031(P02)
- Redline Site Location Plan as Proposed - Drawing GOSHCCC-BDP-ZZ-ZZ-DR-A-2000-1035
- Site Plan as Proposed - Drawing GOSHCCC-BDP-ZZ-ZZ-DR-A-2000-1036(P02)
- Revised Drawings as set out within revised drawing schedule, prepared by BDP
- Revised Basement Impact Assessment (August 2022), prepared by A-squared Studio
- Revised Deconstruction and Construction Management Plan (October 2022), prepared by SISK
- Revised Transport Statement, incorporating GOSH Temporary Relocation Note (October 2022), prepared by RSK
- Draft Travel Plan (October 2022), prepared by RSK
- Revised Archaeological Desktop Assessment (August 2022), prepared by ADAS

## Additional/Addendum Supporting Documents

- Design Response (October 2022), prepared by BDP
- Daylight and Sunlight Assessment Update Note, prepared by Avison and Young
- Heritage and Townscape Visual Impact Assessment Addendum (HTVIA) (October 2022)

## Other Responses

- Energy Statement and Whole Life Carbon (WLC) GLA Response
  - Completed GLA WLC assessment template excel sheet (March 2022 version)
  - Completed GLA Energy template excel sheet.
- GOSH Public Consultation Responses Document (October 2022), prepared by Turley, BDP, GOSH and SISK
- The Powis Place Report (Oct 2022), prepared by BDP, GOSH and SISK
- Heritage Response to Statutory Consultees (excluding Historic England) (October 2022), prepared by Turley
- GLA Sustainable Drainage comment – email response
- Thames Water comments – Tabularised response

- 1.3 We deal with each in turn at the sections below.

## 2. Revisions to the Application Red Line Boundary

2.1 The planning application redline boundary on the existing and proposed site location plans and the proposed site plan has been updated to encompass the revised and reduced construction site hoarding area and the decision by the Applicant to utilise the Paul O’Gorman (POG) for construction welfare facilities. The key changes to the redline site location plan include:

- Amendment to the boundary line on Great Ormond Street to incorporate the reduced scale of protective hoarding arrangements that will facilitate the safe separation of construction vehicular traffic along the street.
- Amendment to capture safe access into the POG during its use as site welfare accommodation.
- Amendment to revised hoarding arrangements to secure the top of an existing services ramp from Powis Place to the level below street. The hoarding line will maintain fire egress routes from the GOSH VCB Building.
- Short term (for a period of circa 2-3 months) increased hoarding requirement to facilitate early enabling works to the lightwell in front of the POG. The removal of an existing ramp and step arrangement and the provision of a new staircase to provide secondary means of escape from below street level accommodation during construction activity.
- Inclusion of the existing ramp from Great Ormond Street to the Level 1 service yard. This route will be required to facilitate construction logistics.
- The existing reception area has been captured to represent fire strategy upgrade works required to enable connection to proposed entrance volume. This represents short term and sequenced construction activity and doesn’t in itself require planning permission.

2.2 At the same time, the redline site location plans have been updated with revised blue line to include those properties along the south side of Great Ormond Street that the Applicant has a freehold or leasehold interest.

### 3. Design Revisions

#### **Scheme changes reflected in Design Note, Revised Drawings and HTVIA**

- 3.1 Historic England (HE) submitted representations (dated 10<sup>th</sup> June 2022) on the planning application. The Applicant has carefully considered HE's representations and undertaken further detailed assessment work, informed by further accurate visual representations and technical assessment prepared by Hayes Davidson.
- 3.2 The further assessment work considers the perceived impacts of the Proposed Development as submitted and has considered means by which any perceived impacts in townscape views (particularly in LVMF View 4A.1 – Primrose Hill to Saint Pauls) can be minimised while still maximising the delivery of public benefits through delivering the Applicant's clinical brief.
- 3.3 The Proposed Development as submitted, incorporates some architectural elements, which would extend above the threshold height of the Landmark Viewing Corridor from Assessment Point 4A.1.
- 3.4 The Applicant has taken the decision to reduce the scale of the eastern core of the building at roof level which involves designing a narrower eastern core, which reduces the massing. As set out within the submitted HTVIA Addendum, in overall terms, the visual impact of the reduced eastern core on the appreciation of the composition of St Paul's Cathedral would be materially reduced when assessed against the original submission and will better align with the purpose of London Plan Policies HC3 and HC4 to maintain the composition of the view and the legibility of the Strategically Important Landmark within this view. As noted within the HTVIA, these changes are only appreciable in the highly magnified (600% zoom) version of the proposed view.
- 3.5 The HTVIA, also includes as appendices, a response to HE with respect to LBC Design Review Panel (DRP) comments which has been prepared by BDP and the East Core Needs Case (October 2022), prepared by GOSH.
- 3.6 A series of revised drawings which reflects the revised and reduced east core accompany this revised submission. These are set out within the accompanying drawing schedule prepared by BDP.

## 4. Revisions and Updates to Other Supporting Reports

### **Revised Basement Impact Assessment**

- 4.1 A Basement Impact Assessment was submitted with the planning application that has been the subject of 3<sup>rd</sup> party review by Campbell Reith on behalf of the Council. Comments were received from Campbell Reith on 13 July 2022 as set out within their Basement Impact Audit. The Applicant's consultant A2 Squared has been liaising with Campbell Reith and responses have been prepared which has enabled Campbell Reith to conclude the updated Basement Impact Assessment (including Audit Tracker and email response 28<sup>th</sup> September 2022) addresses their comments in full.
- 4.2 The full response is enclosed, and we understand that Campbell Reith will be preparing an updated Audit to LBC to confirm all matters have been closed out.

### **Revised Deconstruction and Construction Management Plan (DCMP)**

- 4.3 Since the submission of the planning application SISK has reviewed comments raised from LBC officers, local residents and businesses.
- 4.4 Many of these comments relate to whether the Applicant could reduce the extent of public highway used for construction purposes, whether the construction could be phased, whether other construction routes were available, whether congestion on Great Ormond Street could be reduced and clarification on specific points within the DCMP.
- 4.5 Sisk and GOSH have thoroughly reviewed the opportunities to improve and reduce the impact of site logistics which is set out within this Revised Deconstruction and Construction Management Plan (DCMP). A series of changes and refinements are proposed to the construction strategy to reduce the effects from construction on neighbours and local businesses.
- 4.6 Key changes that are proposed include:
- The proposed temporary entrance has been moved from Powis Place to Guilford Street removing a significant amount of hospital related traffic from Great Ormond Street. During the construction period there will be a reduction in traffic on Great Ormond Street than currently experienced.
  - A large temporary Welfare Facility was proposed outside the Octav Botner Wing for the full duration of the construction programme. This has been reviewed and it is now proposed to only have in place a much smaller temporary Welfare Facility to enable work to take place to POG. This will enable the Welfare Facility to move into POG and for the temporary Welfare Facility outside the Octav Botner Wing to be removed.
  - Amending the proposed vertical lifting strategy during the construction whereby the proposed tower cranes have been relocated within the building footprint which has reduced their impact on the public realm.

- Detailed further justification has been provided to demonstrate that the proposed vehicular logistics route is the most appropriate solution to enable construction of the proposed development.
- Other points of detail raised have been commented and responded upon within the DCMP.

#### **Revised Transport Statement incorporating Temporary Alternative Entrance Note**

- 4.7 Comments were received from the LB Camden Transport Team on 29<sup>th</sup> June 2002. The majority of comments related to the points of clarification with respect to assumptions made within the Transport Statement (TS) around staff and patient numbers remaining largely unchanged particularly on the basis of the uplift in floor area.
- 4.8 The revised TS notes that the majority of facilities within the CCC will be decanted from other buildings around the wider hospital island site with some capacity increase in beds, new theatre suite and new equipment. The increase in capacity will cater for general population growth and therefore will lead to a gradual increase in patient visits and staff while reducing waiting times for patients.
- 4.9 The recent pandemic has led to a change in working practices at GOSH with an increase in virtual appointments for outpatients and an increase in staff being able to work from home. Although there will be an increase in patient numbers and staff, these will not lead to a greater volume compared to pre-pandemic and therefore result in no change in transport needs. Further details are set out in detail in Chapter four of the Revised TS.
- 4.10 Minor comments were made by the GLA within their Stage 1 Report on cycle parking including a request for a drawing setting out cycle parking dimensions, clarification on the end of journey facilities and a request to engagement with LBC on results of traffic surveys undertaken by the Applicant. Each of these points are addressed in full within the TS.
- 4.11 Comments from the Camden Cycling Campaign have been received. These are also addressed within the TS and within the consultation responses document.
- 4.12 The Revised TS also coordinates with the Revised DCMP and sets out the case for the temporary entrance being relocated from Powis Place to Guilford Street during the construction activities.

#### **Draft Travel Plan (TP) (2022)**

- 4.13 The Applicant has been working with RSK since the beginning of the year with the preparation of a new Travel Plan (TP) for GOSH which was progressed following recent staff surveys that had shown that the pandemic has had an effect on both the operation of the hospital as well as staff travel to the site. The measures implemented to date along with an updated, evidence-based strategy, will help to ensure that GOSH staff and visitors can contribute to and benefit from future plans by the Trust to actively promote sustainable travel choices within the context of the 'new normal' (post pandemic) and meeting NHS net zero targets and support the Clean Air Hospital Framework.

#### **Revised Archaeological Desktop Assessment (August 2022)**

- 4.14 Comments were received from the Great London Archaeological Advisory Service (GLAAS) in June 2022 on the Archaeological Desktop Assessment that was submitted with the planning application. A series of requests were made for further information on the site and wider hospital site including historic mapping and results from previous archaeological evaluations on earlier development phases at the hospital.
- 4.15 These were provided to GLAAS in the form of a Revised Archaeological Desktop Assessment. GLAAS subsequently responded by email on the 25th August 2022 confirming the revised desktop has addressed all of the comments made on the earlier submitted report subject to the inclusion of a specified planning condition.
- 4.16 The approved Revised Archaeological Desktop Assessment is therefore submitted formally to LBC.

#### **Daylight and Sunlight Update Note**

- 4.17 Since the submission of the planning application The BRE (Building Research Establishment) published an updated set of Guidelines entitled 'Site layout planning for daylight and sunlight: A guide to good practice' on the 8th June 2022. At the time of submission for the proposed scheme, the 2011 BRE Guidelines were the appropriate guidelines for assessing daylight and sunlight effects. Avison Young (AY) has reviewed the updated BRE Guidance and advised that there are no significant changes to the methodology or recommendations for the assessment of effects on neighbouring properties within the 2022 BRE Guidelines. AY has confirmed within their Daylight and Sunlight Update Note that the daylight and sunlight methodologies remain the appropriate methodologies for assessing effects on neighbouring properties and that the conclusions reached in AY's Daylight and Sunlight Report dated 20th May 2022 (GOSHCCC document number S2 P01) remain valid.
- 4.18 Further to the above review, AY has considered the consultation responses received on daylight and sunlight from neighbours, businesses and amenity groups. AY has produced a commentary which is included within the submitted Daylight and Sunlight Update Note (also appended within the 'GOSH Public Consultation Responses Document (October 2022)').
- 4.19 Some neighbours requested on-site surveys be undertaken of their properties for the purposes of accuracy. This included the resident of Flat 8, 37-39 Great Ormond Street. The additional Daylight and Sunlight Note reports on the findings following the on-site surveys which is set out within the Note. The Applicant reached out to other neighbours but the offer was not taken up.



## 5. Responses to Statutory Consultation Comments

### **Energy and Whole Life Carbon Assessment Review Response**

- 5.1 Comments were made on the Energy Statement and Whole Life Carbon (WLC) Assessment by the GLA as part of their Stage 1 Review in a set of schedules. BDP has reviewed the detailed comments and included their response back within the updated GLA Energy and WLC Schedule.
- 5.2 These are included within the revised submission for completeness and the design team will continue to work with the GLA to close out any residual comments prior to Stage 2.
- 5.3 Consultation responses were received from other statutory consultees as noted below. These comments have been responded to as follows:

### **Response to Comments from the Georgian Group, Society for the Protection of Ancient Buildings and Bloomsbury Conservation Area Advisory Committee**

- 5.4 Turley Heritage and BDP have prepared a response to both the design and heritage related responses. The Applicant's response to consultation comments from the above statutory consultees is provided with the enclosed Heritage Response to Statutory Consultees (excluding Historic England) (October 2022), prepared by Turley Heritage and enclosed as Appendix 1.

### **Response to Thames Water comments**

- 5.5 The Applicant received comments from Thames Water on 10 June 2022. SISK has prepared and submitted the following documents to Thames Water to address their comments:
- Thames Water Comments - Applicant Responses - October 2022
  - GOSHCCC-BDP-ZZ-ZZ-DR-S-1000-3996 - Relationship Between Proposed New Works and Thames Water Public Sewer Water Mains
  - Great Ormond Street Hospital Drainage Strategy Report (April 2022)
- 5.6 The above response is appended as Appendices 2-4.

### **Response to Neighbour and Local Amenity Group Comments**

- 5.7 The Applicant has produced a document summarising and responding to the consultation feedback from individual members of the public and the following local amenity groups:
- Queen Square Gardens Trustees
  - Residents and Business Liaison Group
  - Bevan House Management Company
  - Bloomsbury Residents Action Group
  - Great Ormond Street Group

- 5.8 Given the nature of the feedback received, the responses document compiles the consultation responses received into a series of topics and a response is provided on each one. This document is enclosed within the submission pack (GOSH Public Consultation Responses Document (October 2022)).

## **Appendix 1:** Heritage Response to Statutory Consultees (excluding Historic England) (October 2022)

## **Appendix 2:** Thames Water Comments - Applicant Responses (October 2022)

**Appendix 3:** Plan GOSHCCC-BDP-ZZ-ZZ-DR-S-1000-3996 -  
Relationship Between Proposed New Works and  
Thames Water Public Sewer Water Mains

## **Appendix 4:** Great Ormond Street Hospital Drainage Strategy Report (April 2022)

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