#### OBJECTIONS TO PLANNING APPLICATION No 2022/2255/P

## Summary

Damage which would be caused by the proposed building. Gt Ormond St is a historic and important street. It has 18C houses. It and Lamb's Conduit Street are unusual for central London in having predominantly low buildings, and almost all the large ones are set back from the street (the exception, the Octav Botnar Wing!). The existing building on Gt Ormond St is not distinguished, but its impact on the street is minimised by it being set back from the pavement and stepped back at first floor level. The new building would rise a small distance from the pavement, straight up, well above neighbouring buildings – the Paul O'Gorman Building and the Octav Botnar Wing. In that way it would destroy the local heritage environment as well as blocking light from buildings across the street, and turning Gt Ormond St into a narrow canyon.

<u>Damage which would be caused by the construction traffic route</u> The construction route would damage local businesses – who wants to sit outside, eating or drinking while vast construction vehicles roll passed? Who will want to do their shopping in the area? The route would endanger cyclists, pedestrians and other road traffic. It would cause the north south cycle route along Lamb's Conduit St to be diverted. It would be likely to cause ancient buildings to be damaged by vibration. It would increase air pollution.

No benefit to the local community No benefit to the local community is shown.

<u>Community Liaison</u> Throughout the process consultation has been limited – listen (perhaps) and pay no attention – GOSH have made no serious attempt to remedy community concerns.

<u>Failure to deal with important issues</u> A number of significant issues remain unresolved, most notably the proposed relocation of the zebra crossing on Guilford St, used by children going to Coram's Fields, and overlap with the works on the Tybalds Estate. This is wholly unacceptable.

<u>Need for the proposed building?</u> GOSH have said they wish to build a world class child cancer centre. There is no evidence that the proposed building is needed to deal with a shortage of clinical facilities, or for a shortage of world class facilities, for child cancer patients in the UK, let

alone in central London. Empire-building? A vanity project?

And in fact the majority of the proposed new building would be used to enable the hospital to deal with general population growth.

#### Conclusions

The proposed building would destroy a heritage environment, and seriously damage local residents and businesses. There is no evidence that a "world class children's cancer centre" is needed in the UK, let alone in central London. The building is proposed to deal mainly with general population growth. Facilities for seriously ill children should be spread more evenly around the country, and central London, a noisy, polluted environment is the worst place for them - other inner city hospitals have moved to more appropriate sites, which provide room to expand. Most worryingly, it is certain that the trustees will have further plans in future to upgrade and expand existing facilities, and will wish to knock down existing buildings and build larger ones, again and again. Now is the time to say No - before the heritage environment of Gt Ormond St is wrecked!

## No - before the heritage environment of Gt Official St is wrecked

## New documentation

#### General

The new documents use broad brush, unverifiable, assertions and show remarkable optimism/frightening complacency in many places, eg DCMP, para 5.3 "issues will be dealt with swiftly"; para 9.2 Vibration "remedial measures will be proposed, agreed [it takes two to agree], and implemented";; p 22 Transport Assessment "no increase on pre-pandemic levels", but "work needs to be done to balance virtual appointments [what does that mean?]"; it is said that 36 HGVs will be using the route at peak construction period, but it is assumed that they will be spread equally throughout the day, p35; the Response to Heritage Groups.

## Level 2 Drawing

This shows that the building will rise a small distance from the pavement. (At GOSH's "event" on 10<sup>th</sup> December, no-one was able to tell me the width of the strip between the building and the pavement.) This increases the impact of the proposed new building, compared with the existing building, exacerbating the blocking of light to buildings across the road, destroying the heritage environment and turning Gt Ormond St into a canyon.

Buildings opposite will be substantially affected by loss of light, which will reduce their

value considerably. Will occupiers and owners be compensated? There is a risk that the buildings' domestic use will end.

## Level 2 Landscaping Drawing

Minimal greenery at ground floor level.

## Level 10 Landscape

The roof is irrelevant for local people.

# Area Plans

These show that the proposed building would not be stepped back until Level 10, and there only a small amount (unlike the existing building), thereby exacerbating the damaging effect of the proposal.

The Area Schedule shows that much of the building will be used as a school, cafe and OP dispensary.

## **South Elevation**

This shows how much bigger the proposed building is compared even with its GOSH neighbouring buildings, the Paul O'Gorman Building and the Octav Botnar Wing. A monstrous addition to the street.

### West and East Elevations

A ghastly view from Lamb's Conduit Street, dwarfing all buildings on that street.

It would have been interesting to see a view of the building from Queen Sq. The east elevation assumes the non-existence of the old Homeopathic Hospital.

#### North Elevation

It would have been interesting to see the view of the proposed building from Coram's Fields and Brunswick Square.

### Powis Place Construction Route Feasibility

There is a strong flavour of GOSH not being willing to solve any of the problems. No-one is suggesting that GOSH should unilaterally use land owned by someone else.

#### **DCMP**

General impact of construction? Eg removal of existing building and use of concrete in new building?

Para 4.4: Permitted Working Hours. "When required to work outside" permitted working hours - required by who? Why should work be done outside permitted working hours in a residential environment? Why should work involving noise and vibration be allowed outside permitted hours?

It is noted that no work will be carried out on community event days <u>led by GOSH</u>, but not other community event days. Yet further indication of the failure to consider the local community.

Para 5.0 Community liaison has been lamentable. The message from GOSH has been we propose building our new CCC regardless of your views.

Para 5.1: It states that the Trust's Project Manager will communicate complaints for action when necessary – so GOSH decides when action is necessary. Not good enough.

Shouldn't unresolved complaints be notified to Camden immediately, not on request?

Para 5.2 Neighbouring Sites: No indication of any measures to be taken in relation to overlap with work on the Tybalds Estate. No overlap should be permitted.

Para 7.1 Second paragraph: "creating a more attractive environment for cyclists." More attractive than what? Certainly not more attractive than the current situation.

Cyclists wishing to travel west-east along Gt Ormond St would face a considerable diversion via Boswell St. And cyclists intending to travel south – north along Guilford Place would face a considerable diversion via the eastern end of Gt Ormond St, Millman Street and potentially Guilford St. Those travelling north – south down Guilford Place and Lamb's Conduit St (a very narrow street) would be threatened by the heavy construction vehicles. It is more than likely that cyclists will travel the wrong way down one way streets or take to the pavements endangering pedestrians.

Para 7.2 The Travel Plan is about GOSH staff travel, not the local community.

Para 7.3: Pedestrians (including children going to and coming from school) would be affected by the closure of the pavement on the north side of Gt Ormond Street, necessitating crossing Gt Ormond St or Boswell Street.

The drawings show clearly the narrowing of Gt Ormond Street because of the hoarding, with inevitable impact on occupiers of buildings on the south side.

The photos show how narrow Boswell Street is, with high buildings on each side which would increase the noise and pollution for occupiers from increased traffic.

Large construction vehicles would be likely to mount pavements at corners, eg Gt Ormond St into Queen Sq.

Para 7.4, p 29 – What are the white spaces on the swept path diagrams?

Para 7.9 Horrific.

It is assumed the "general" means "average". Some days it would be higher.

No detail is provided about the number or frequency of "exceptional construction traffic". It seems that this traffic would cause significant disruption, noise and pollution to other road users, pedestrians and occupiers of the relevant streets.

Para 8.1: The use of Guilford St for the main entrance would impact on occupiers of that street, including children accessing Coram's Fields. It is said it would reduce traffic on Gt Ormond St, but the construction traffic would still create a major danger for road users and pedestrians, and pollution and noise for occupiers of buildings along the route.

Para 8.2: 'Potential relocation of zebra crossing"? This affects in particular children going to Coram's Fields. Detailed information is needed.

Considerable limitation of parking spaces in an area very short of on street parking.

Considerable disruption would be caused to occupiers of buildings in the streets forming the construction traffic route from noise, pollution, dangerous traffic: and how would businesses in Guilford Place. Lamb's Conduit St, Gt Ormond St and Boswell Street get deliveries? Would their suppliers be willing to deliver outside the Red Line hours?

Last bullet point: information about ambulance parking and taxi drop off is needed now.

Fig 27 This seems to show that 8 disabled spaces are available and predicted demand is up to 35.

Fig 29 Not much better.

Para 8.3: The number of road closures which would be required is significant. Sisk appear to have considered the effect on GOSH, but not on other road users. This is unacceptable.

Para 8.4 It appears that the seats in memory of Councillor Brian Woodrow, paid for by friends and grateful constituents, would be removed. Where would they be placed during the construction work? Would they be replaced in their current position afterwards?

Para 8.4 It is not clear what changes are proposed to the southern pavement of Guilford St, or to the location of the pedestrian crossing in Guilford St, both used by, inter alia, children accessing Coram's Fields. Unacceptable.

Para 8.5 LED lighting will be used "where applicable". Where will it not be used?

Para 9.1.1; The acoustic monitoring suggests greater concern about users of the hospital than neighbours.

Para 9.2.1 What about a survey to find out pre-construction vibration outside the site and hospital?

Para 9.2.4 What about monitors outside the site and hospital?

## **Transport Assessment**

This focusses almost exclusively on transport use by patients and staff. It fails to consider in any detail the effect on local residents and businesses.

Para 2. The current plans are not sustainable because they do not address the long-term needs of the hospital for greater space; and they would concentrate high class facilities in central London as opposed to the rest of the UK. Moreover they would destroy a heritage environment.

Para 2.1.1 states that NPPF requires plans to address the needs of disabled persons but the proposals would significantly reduce the number of disabled parking places.

Pra 2.2.3 refers to the use of cars by Londoners. One of the major factors must surely be the use of cars by patients' families – which is very understandable in the case of children in need of medical care.

Para 3.1 Queen Sq links Gt Ormond St to the west only by means of Cosmo Place, a pedestrian alley. The area has numerous restaurants, pubs and cafes as well as retail, office and residential premises.

Para 3.2.1 states that the main route from Queen Sq (or do they mean Gt Ormond St?) turns south along Boswell St. It ignores the fact that much traffic currently travels east along Gt Ormond St, into Guilford St via Guilford Place or Millman St.

Para 3.2.3 Is there a northbound bus stop near the end of Cosmo Place?

Para 3.4. This does not take account of the fact that many patients will have limited mobility. Para 3.5 states that 25% of patients use cars.

Para 4.2. "The Phase 4 proposals will form part of the wider proposals for GOSH in being able to accommodate an increase in patients, reflective of the population growth in the UK". In other words, the proposed building is intended to enable GOSH to deal with population growth.

".. work needs to be done to balance virtual appointments." What does this mean? It

casts doubt on the later conclusion that face to face outpatients appointments will increase by only 1.4%

Para 4.4 implies that the main entrance will return to Gt Ormond St. But my understanding was that it was planned that the main entrance would in future be in Guilford St. Has this plan been dropped, or are they proposing to change back and forth twice? See also para 4.5.3.

Para 4.4. The change of the main entrance to the hospital to Guilford St will not affect all ambulances, deliveries or patients. So traffic along Gt Ormond St would be less reduced than might be expected. It would make little difference to the damage suffered from the construction traffic by residents and businesses in Guilford PI, Gt Ormond St (both east and western sections), Queen Square and Boswell St. It would be likely to increase traffic along Guilford St, affecting local residents, including children using Coram's Fields. And there would be a significant effect on cyclists using the north/south cycle route along Guilford Pace and Lamb's Conduit St. North bound cyclists would be required to make a significant diversion via the eastern end of Gt Ormond St, Millman St and Guilford St. At the junction of Millman St and Guilford St they wouldl be faced by construction traffic approaching from the east. It is likely that many such cyclists and cyclists travelling south down Guilford PI would be tempted to cycle on the pavements.

Residents and businesses in Boswell Street would be significantly affected by Gt Ormond St being one way, and by the no stopping order. All traffic from Gt Ormond St, Queen Square, Orde Hall St and Old Gloucester St would have to exit via Boswell St. That would include ambulances accessing all the hospitals, and some delivery vehicles.

Having part of Gt Ormond St two way, for ambulances only, would be likely to confuse all road users and pedestrians, and would be likely to lead to some non-ambulance road users travelling eastbound along Gt Ormond St.

Cyclists travelling westbound along Gt Ormond St would be required to exit via Boswell St – potentially a significant diversion - or would be tempted to cycle on pavements or along alleys much used by pedestrians.

Para 5.1 states that consultation is on going about Gt Ormond St remaining one way.

Consultation with who? Have local residents and businesses been consulted?

Para 5.2.3 This does not assess the use of Gt Ormond St by westbound traffic, including cyclists.

## Daylight sunlight BRE Guidance

Contrary to what is said in the first paragraph, the document states that the methodology remains correct, but that does not mean the conclusions are. My previous objections stand.

## Daylight sunlight letter

A shocking effect on someone's home.

## **Design Submission Revision**

While the changes to the top of the building to avoid obstructing the sightline of St Paul's are welcome, they would make no difference to the damage to the local area.

## Travel Plan

This seems to relate to staff travel, not travel by patients, visitors, deliveries, ambulances etc. It will make little or no difference to the damage which would be caused to the community by the traffic construction route.

### Response to Heritage Groups

The response is mere assertion and shows frightening complacency.

Para 1.8 The Morgan Stanley Building is not on Gt Ormond St. Is it visible from the street? Not only is the proposed building broadly twice as high as the existing building, it is significantly higher than its direct neighbours the Paul O'Gorman Building, and the Octav Botnar Building. The fact that there are high buildings in the vicinity does not mean that building a bigger one in a heritage environment is OK!

Para 1.9. Is there a "Representative View" from outside one of the ancient buildings opposite? The building will make the street into a canyon.

Para 1.10. If GOSH believe that it is the "street pattern" which shows the area's heritage,

Heaven help us. To say that the proposed new building would not affect the domestic character of the street is nonsense.

Para 1.11 While the existing building may not be distinguished, it does not cause irreparable damage to the local heritage environment.

Para 1.13-16 The fact that residential amenity would be significantly affected by the proposed building would put at risk domestic use of those buildings.

No significant change has been made to take account of the concern that the new building will seriously affect a heritage environment.

# Consultation Response and Resubmission Report

Para 4.8 "...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 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 time for patients." In other words, the proposed new building is not needed for facilities for children's cancer care.

#### Public Consultation Response Document

It is to be hoped that Camden does not rely on GOSH's summary, and makes its own assessment of GOSH's response.

Jane Richardson

Ex long term resident of

and a visitor as frequently as possible