



Historic England

Mr Patrick Marfleet
London Borough of Camden
Development Management
Town Hall
Judd Street
London
WC1H 9JE

Direct Dial: 020 7973 3093

Our ref: P01500553

18 November 2022

Dear Mr Marfleet

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**GREAT ORMOND STREET CHILDRENS HOSPITAL, FRONTAGE BUILDING
WC1N 3JH
Application No. 2022/2255/P**

Thank you for your letter of 28 October 2022 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

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. The proposed redevelopment of the Frontage Building of Great Ormond Street Hospital (GOSH) will be a major transformation of the street and would also rise in front of St Paul's Cathedral in the London Views Management Framework (LVMF) vista from Primrose Hill, which is an important aspect of the metropolitan landmark's setting, and thereby harm its significance. The local planning authority must have special regard to preserving these designated heritage assets and their settings, so harm should be minimised. Thanks to additional detailed visualisations that now satisfy mayoral guidance on the LVMF, a considerable reduction in the size of one of the largest elements in the proposed roofscape can be seen to reduce the degree to which the proposal would encroach on St Paul's Cathedral in the view, such that the harm that would arise from the proposals can reasonably be weighed against their public benefits as planning policy requires.

Historic England Advice

Significance of the heritage assets



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Rather than repeat detailed account of the heritage assets that would be affected by the proposals contained in our first letter, this one focuses on a concise review of the significance of those to which we identify harm from the proposals.

a) Great Ormond Street in the Bloomsbury Conservation Area

Great Ormond Street began in the late 17th century as a development of third-rate houses on its south side by the notable London speculator, Nicholas Barbon. To the west, Queen Square followed in the first decades of the 18th century. Various grand houses and terraces on the north side of the street were succeeded in the 19th century by medical institutions - chiefly GOSH. Those to the west of Powis Place, while larger in scale than the Georgian terraces, are late-Victorian and Edwardian hospital buildings which cohere as a townscape group through their rich and fine-grained architecture. To the east, GOSH's 20th-century buildings have a relatively poor interface with the street, weak articulation and lack of architectural interest.

The surviving terraces and several houses and other buildings in Queen Square are listed at Grade II* or Grade II. The street remains integral to the character of one of the earliest surviving areas of residential development in Bloomsbury and, notwithstanding the hospital, retains great consistency of scale, grain and architecture with its neighbouring streets. This provides a complementary historic setting to their listed buildings.

b) St Paul's Cathedral and the LVMF views

The site sits near the intersection of several strategic metropolitan vistas focused on Sir Christopher Wren's St Paul's Cathedral, which are designated in the LVMF and protected in planning policy. Specifically, it would sit within and slightly exceed the threshold of the Landmark Viewing Corridor (LVC) to St Paul's in the panorama from Primrose Hill (Assessment Point 4A.1).

Protected views of St Paul's Cathedral from across London have been codified since the 1930s, with a focus on its distinctive silhouette and a clear view of its spectacular dome from the base of its drum upwards. These views of the architecture St Paul's - a monument of exceptional importance to London, listed at Grade I - in its widest urban setting contribute a great deal to the Cathedral's significance.

Impact of the proposals

The proposals would replace the present 1950s and 1960s 'Frontage Building' range with a single building providing a Children's Cancer Centre, as well as a more





welcoming new 'front door' to the campus. Its street elevation would be composed of two canted seven-storey 'houses' in red brick and reconstituted stone, separated by two 'garden' bays of recessed balconies. Two further solid storeys would be set-back above these, with additional overruns, plant, antennae and a landscaped garden situated on the long flat roof.

a) Bloomsbury Conservation Area

Long pre-application engagement with Camden officers and the Design Review Panel has informed considerable work by the architects to manage the scale and bulk of the proposed building. Notwithstanding the revisions made and the positive architectural qualities of the proposal, it would bring a considerable shift in scale relative to the context. Specifically, the increase in height and bulk on the site, with the relatively blank uppermost storeys becoming considerably more visible in architecturally rich conservation area views, would contrast with the historic qualities of character and appearance of this part of the conservation area, causing some harm to its significance.

b) St Paul's Cathedral and the LVMF views

Further analysis has confirmed that the proposal's presence in the background of LVMF Protected Vistas from Greenwich Park (Assessment Point 5A.2) and Blackheath Point (Assessment Point 6A.1) would be negligible. Seen from the static viewpoint on Primrose Hill (Assessment Point 4A.1), the proposed building would sit in front and slightly to the right of the dome and western towers of St Paul's. The amended proposal has considerably reduced the silhouette of the lift and stair core overrun on the roof, which would have obscured part of the peristyle of the dome in the view. Its reduction would reduce its perceptibility and the intrusion into the view above the dome's drum that it would make in the more-loosely defined view from Primrose Hill. The proposal's remaining impact would be to slightly obscure a small part of the drum and the base of the north-western tower of the Cathedral. By impairing, in the language of the LVMF, recognition and appreciation of the landmark and the signature qualities of its architecture through this interruption of its London-wide setting, the proposal would still cause a very low level of less than substantial harm to the significance Grade-I listed building.

Relevant planning policy context

Local planning authorities are required, under the Planning (Listed Buildings and Conservation Areas) Act 1990, to have special regard to the desirability of preserving listed buildings or their settings, and to the desirability of preserving or enhancing the character or appearance of conservation areas.





The National Planning Policy Framework (NPPF, 2021) further requires that great weight should be given to the conservation of designated heritage assets, and the more important the asset, the greater the weight should be (paragraph 199). Paragraph 202 of the NPPF instructs that this harm should be weighed against the public benefits of the proposals. A clear and convincing justification of harm is required, linked to the need for local authorities to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal (paragraph 200). In practice that may mean exploring less harmful alternative solutions.

The London Plan (2021) supports the statutory duties and further states in heritage policy HC1(C) that Boroughs should actively manage the cumulative impacts of incremental change to heritage assets and their settings, and ensure that developments avoid harm and pursue enhancements.

Policy HC4 of the London Plan relates to the LVMF and policy HC3 deals with strategic views more broadly. They state that development proposals should not harm strategic views, such as by being "intrusive, unsightly or prominent" in the foreground of designated views, but should enhance viewers' ability to recognise and appreciate Strategically-Important Landmarks, such as St Paul's Cathedral. Part F1 states explicitly that "Where there is a Protected Vista... development that exceeds the threshold height of a Landmark Viewing Corridor should be refused". The LVMF SPG (2012) (pp. 7-9) calls for visual materials supporting proposals that would affect protected views to be sufficiently sophisticated to enable consideration of detailed aspects of the design.

Historic England's Position

Historic England welcomes the applicant team's additional submission of high quality visual analysis of the proposal's impact in the LVMF view from Primrose Hill, reflecting the mayor's SPG guidance. The effort to reduce extraneous massing on the rooftop has helped to address our concerns. The detailed appearance of the building and its roofscape in this view, because of its proximity to St Paul's as a special focus of attention, is worth careful interrogation and refinement.

In the Primrose Hill London Panorama, Viewpoint 4A.1, existing towers around Euston Station cause harm to St Paul's by intruding conspicuously and unsympathetically in the view close to the more delicate silhouette. With proposals for redevelopment of those sites expected, LB Camden should be mindful of the call in London Plan policy HC1(C) to actively manage the cumulative impacts of incremental change from development on heritage assets and their settings. You should consider and determine this and future applications associated through the protected view having regard the





emphasis London Plan policies HC3 and HC4 place on the way the views and their landmarks, such as St Paul's Cathedral, provide cultural orientation and contribute to the image of London at the strategic level.

The amendments have reduced the degree to which the proposals would encroach on and block portions of St Paul's Cathedral in the view. This has helped considerably to minimise the harm that this proposal would cause to an exceptionally significant asset. You will have to weigh that very low level of less than substantial harm, along with harm caused to the Bloomsbury Conservation Area, against the public benefits proposals, as required by NPPF paragraph 202.

Recommendation

Historic England has no objection to the application on heritage grounds. We consider that the application is capable of meeting the requirements of the NPPF, in particular paragraph numbers 195 to 202.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

Yours sincerely

Alfie Stroud

Inspector of Historic Buildings and Areas
E-mail: alfie.stroud@historicengland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk

