



**For the attention of Patrick Marfleet**

**Ref: 2022/2255/P – Great Ormond Street Hospital, Great Ormond Street, WC1N 3JH**

The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history, and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews planning applications relating to important historic buildings and seeks to ensure a sustainable future for vital aspects of London's built heritage.

The Committee considered this application at its meeting on 29th November 2022. It is understood that minor amendments had been made to the original application submitted in May 2022.

The Committee concluded that by reason of excessive height, mass, scale and bulk the proposals cause a high degree of harm to designated heritage assets of very great heritage significance. These comprise:

1. Encroachment into and blocking of the protected view of the dome and western towers of St Paul's Cathedral from Primrose Hill. The whole top floor of the proposed accommodation together with additional roof top plant and equipment rises above the maximum permitted height for protection of this view. This is totally unacceptable. The protection of such a view should be sacrosanct.
2. Harmful impact on the character and appearance of the Bloomsbury Conservation Area, one of central London's most important conservation areas whose Georgian buildings and streets are of heritage value.
3. Harmful impact on the setting of Grade II\* and Grade II buildings on the south side of Great Ormond Street, including severe loss of daylight which will compromise their continued residential occupation.

In addition, the Committee were concerned that the applicant's Desk-top Archaeological Report fails to identify or adequately describe the exceptionally fine early Georgian houses that occupied the application site prior to the construction of the post-war buildings currently on the site. Owing to the deep basements of these Georgian houses and the shallow basement of the existing building it is possible that earlier fabric or deposits survives on the site. This should be recognised and factored into archaeological requirements.

The Committee considers that while the level of harm may, within the definition of the National Planning Policy Framework, be less than substantial, the degree of harm lies towards the upper end of the scale of less-than-substantial harm. Paragraph 199 of NPPF requires that *“... when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*

The Committee is aware, under Paragraph 202 of NPPF, that *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal”*. While the Committee is well aware of the medical benefits provided by the proposals, the overwhelming height and scale of the proposed new building is such that it brings into question the suitability of the existing cramped and restricted site for such expansion and suggests that the public benefits of additional clinical provision should be better provided elsewhere. There is a long history in London of long-established hospitals moving to larger and more flexible sites, including St Thomas’s, the Royal Free, Charing Cross, and most recently Moorfields Eye Hospital. A similar strategy should be fully explored by GOSH rather than causing such irreversible harm to heritage assets.

Vicki Fox

**Hon. Secretary, LAMAS – Historic Buildings & Conservation Committee**

**2 December 2022**