

**From:** Kathryn Hughes

**Sent:** 01 January 2023 21:35

**To:** Patrick Marfleet

**Cc:** Planning

**Subject:** Objection to Planning Application 2022/2255/P (Great Ormond Street Children's Hospital)

Dear Mr Marfleet,

I write to you to express my strong objection to Planning Application 2022/2255/P proposed development of the existing Great Ormond Street Hospital, frontage building, to a Children's Cancer Centre (CCC), and ask you to recommend refusal of planning permission.

It is important to clarify that my objection has nothing to do with the medical services, staff or patients of the hospital as I recognise and respect the work of the hospital.

My objection has everything to do with the proposed scheme, and how the hospital's plans will cause significant harm. Harm that greatly outweighs the public benefit of this proposed development. Should this development be approved, Great Ormond Street Hospital will go from being a good neighbour to a very bad neighbour indeed.

My objection is based upon the following, which I believe to be material considerations in planning according to the National Planning Policy Framework, Camden Local Plan, and Camden Planning Guidance (CPG) - Design CPG (Jan 2021), Design CPG (Jan 2021) and Air Quality CPG (Jan 2021):

INVALID PLANNING PROCESS

- The applicant's 'Master Plan' is given much weight and reference, yet this plan was never offered to public consultation.
- How can councillors properly consider, let alone approve, a partial development of the site without knowing the full master plan in detail and its full, eventual impact?
- What is PHASE 5? Why isn't the applicant's existing 9-storey nurses' accommodation building on Guilford Street identified for the currently proposed CCC development? Their existing 9-storey building is of substantial size and its location with frontage on a sizeable thoroughfare could accommodate ambulances and the associated hospital/CCC traffic and operations.

#### SIGNIFICANT HARM BY LOSS OF LIGHT

- The numerous properties opposite the site of the proposed development will suffer extreme reduction of light in breach of the Building Research Establishment (BRE) guidance for Site Layout Planning for Daylight and Sunlight, by a significant margin, including the property in which I stay. It will be plunged into perpetual darkness should this scheme proceed and I will need to turn on electric lighting every day during daylight hours just to see and use living areas.
- The skylight and daylight for properties opposite the development will fall to such a degree that the proposed development would cause significant harm to the occupants of these properties in perpetuity, harm to their physical and mental health and wellbeing.

## UNACCEPTABLE LIVING STANDARD

- According to the National Planning Policy Framework (NPPF) planning applications should make efficient use of land and take into account guidance relating to daylight and sunlight so that a proposed development provides acceptable living standards.
- This proposal would cause extreme loss of light and daylight and eliminate a view of sky (Vertical Sky Component) in the property where I stay and as such would not maintain an acceptable living standard.

## CONSERVATION AREA

- This is an overly ambitious scheme in a historically sensitive site, the Bloomsbury Conservation Area. The plan neither takes fully into account nor improves upon the character and quality of the area. The proposed building with its huge scale and massing would have a substantial detrimental effect upon the area. It would tower over the listed Georgian townhouses opposite and dominate the townscape. It would conflict with the quintessential character of the area - a grid of residential streets with mainly three and four-storey buildings.
- The proposed design is abominable and detracts from the character of the area.

## LOSS OF AMENITY

- The scale and volume of what is being proposed is like fitting a hogshead into a goblet. It is oppressive and overbearing.

- The development goes against the public interest to protect private residents from unreasonable intrusion; there would be excessive overlooking as the height of the proposed development would overshadow and overlook properties and threaten privacy and amenity.

#### FAILURE TO IDENTIFY ALTERNATIVE SITES

- The applicant has not sought alternative locations and solutions. For example, converting the applicant's current 9-storey building on Guilford Street that accommodates nurses, and co-located Southwood Building, into a children's cancer centre. Accommodation for nurses could easily be relocated within walking or public transport distance of the facility.
- The applicant's Master Plan, specifically Phase 5, makes no reference to the intended use of the 9-storey nurses' accommodation building or Southwood Building.
- If Great Ormond Street Hospital has a big vision of the future of childcare, they could find a site to accommodate such, including modern transport hub connections to serve their international clients.
- The overbearing growth of a piecemeal campus approach is unsustainable in a residential area of the city and a conservation area.

#### UNSUSTAINABLE DEVELOPMENT

- The NPPF includes a 'presumption in favour of sustainable development', of which this application fails to meet two of the

following three overarching objectives: 1) economic, 2) social, and 3) environmental.

- This application fails to meet the 'Social' objective – it does nothing to support the community's social and cultural wellbeing, and little to support community health. The proposals are self-serving and do not directly support the health needs of the community or the borough of Camden but instead supply specialist provision to a narrow segment in a national catchment and to non-UK clients. Hence, the proposed facility could be located anywhere, or at another children's hospital in the country.
- This application fails to meet the 'Environmental' objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

#### EMBEDDED CARBON, WASTE & CLIMATE EMERGENCY

- This proposal seeks to demolish a perfectly good, serviceable and functional building, one that could be used for other purposes without the severe negative impacts that the current application brings with it. Surely we need to care for what we already have, not inflict the kind of damage that inevitably comes with demolition and construction of yet bigger buildings using yet greater amounts of raw materials. If the construction of this proposed building goes ahead, best practice says it should be designed and built to last at least 100 years.

- Proposed demolition of the existing building and construction of a new building will contribute to yet more construction, demolition and extraction (CD&E) waste going to landfill. According to the Construction Products Association, five million tonnes of construction and demolition waste in England and Wales annually still finds its way to landfill.
- More than half of all materials extracted from the earth are transformed for use in construction, which is why buildings should be designed for longevity of use as well as efficiency.
- Is this proposal really the best use of the site, materials and best for the area for the next 100 years?

## NOISE

- The plan indicates an entire floor of plant (ventilation/air cooling or air conditioning systems and other equipment). The noise from this will add to the existing noise landscape which is already above the threshold of acceptable standards. There already is noise from the existing hospital's plant and equipment, especially when windows are opened in properties across from the hospital. This noise already unreasonably and substantially interferes with the use and enjoyment of where I stay.
- An over threefold increase in size of the facility will bring yet more noise from more plant and equipment, ambulances, deliveries, staff and other vehicular movements. (The current floor area of 5,806 m<sup>2</sup> will be increased to a proposed floor area of 18,303 m<sup>2</sup>. More than 3 times its current floor area, nearly 3 1/4 times.)

## LOSS OF TREES & CLIMATE EMERGENCY

- The removal of trees is against policy in a conservation area, particularly in a climate emergency. Any proposed replacements will take decades to grow and mature.

## TRAFFIC CONGESTION & AIR QUALITY

- Great Ormond Street, a narrow residential road, already suffers from traffic congestion, poor air quality and traffic noise. It is already unbearable with impatient drivers honking their horns at all hours and ambulances using the entire length of the street as a car park.
- Visitors to the hospital sit with their vehicle engines running, smothering the area in exhaust emissions. Congestion is often backed up end-to-end and around the corner onto Lambs Conduit Street, again pumping out pollutants to air.
- For residents, visitors and customers of local businesses there already is a dearth of vehicle parking and safe drop-off/collection points for delivery drivers and taxis. An over threefold in size new facility will make these issues worse.
- Contrary to the NPPF, the proposed development does nothing to help to improve air quality.

Up to five years of demolition and construction will put local restaurants and shops out of business.

In addition to the above points, I have serious concerns about the below ground levels of this proposed development due to the proximity of the water main.

I would be grateful, please, if you would confirm receipt of this objection and its inclusion in the planning process.

Sincerely,  
Kathryn Hughes

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