

Application No:	Consultees Name:	Received:	Comment:	Response:
2022/0528/P	Donna Baillie	20/03/2023 17:58:46	OBJ	<p>I'm concerned that the new plan appears to replace the existing large Sainsbury's with a smaller, unspecified, supermarket. The existing Sainsbury's is well patronised, and with the influx of all the new people who would be living in the new homes proposed, we would, if anything, need more supermarket space, not less.</p> <p>It also looks like the Homebase would disappear. This is the only shop of its kind in the area and would be a great loss.</p> <p>I note that both the Sainsbury's and the Homebase stores provide a wide variety of reasonably priced and mainly essential goods. This is very important for local residents.</p>

2022/0528/P	Pauline Ryan	20/03/2023 21:20:26	OBJ	<p>I object to the planning application for the 02 Centre on the following grounds.</p> <p>The height and the density of the buildings will be oppressive and be undesirable for the well being of residents. As will be the lack of green open space and communal facilities and general poor social design. Only 35%of units will be affordable and less than this available at social rent . This does not meet the requirements of the Camden plan which says 50% of the units should be affordable.</p> <p>The demolition of the 02 Centre will have undesirable environmental impact on residents in terms of dust ,noise,traffic in addition to loss of amenities.</p> <p>Lack of plans to access West Hampstead Tube Station.</p>
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2022/0528/P	Pauline Ryan	20/03/2023 21:20:29	OBJ	<p>I object to the planning application for the 02 Centre on the following grounds.</p> <p>The height and the density of the buildings will be oppressive and be undesirable for the well being of residents. As will be the lack of green open space and communal facilities and general poor social design. Only 35%of units will be affordable and less than this available at social rent . This does not meet the requirements of the Camden plan which says 50% of the units should be affordable.</p> <p>The demolition of the 02 Centre will have undesirable environmental impact on residents in terms of dust ,noise,traffic in addition to loss of amenities.</p> <p>Lack of plans to access West Hampstead Tube Station.</p>
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2022/0528/P	Cllr Linda Chung	21/03/2023 00:23:28	COMMNT	<p>MY OBJECTIONS</p> <p>I have taken part in Landsec's consultations. We were hoping it would take on board many of community's concerns. We wanted a vibrant development which would incorporate better facilities and more open spaces, but instead, the proposals will cause considerable congestion, and breach Camden's planning policies.</p> <p>1. The site is covered by the Fortune Green & West Hampstead Neighbourhood Plan¹, which earmarks the land between West End Lane and Finchley Road for redevelopment. Unlike the local Conservatives, I agree that a large car park is not a good use of the site. There is a severe housing shortage in the borough, and I support new housing on this site, as envisaged in this Neighbourhood Plan. It is well connected to public transport, and I support a car-free development, which mixes housing, employment, leisure, retail and community uses.</p> <p>2. Throughout all the consultation periods I have consistently called for the proposals to:</p> <ol style="list-style-type: none"> Provide step free access to Finchley Road, and West End Lane tube stations. Meet Camden Council's target of 50% affordable housing, to deliver a mixed community; and Include new amenities, including much-needed green open spaces, places for children and young people to play, and a health centre. <p>3. I have engaged actively with Landsec's consultations over the past two years and encouraged residents to share their views. It is therefore deeply disappointing that there have been no meaningful changes to the plans submitted for approval. On the points listed in para 2:</p> <ol style="list-style-type: none"> There is no clarity on the timing or level of any funding for upgrades of the local tube stations, and no indication that there are active discussions with Camden Council and Transport for London to take this issue forward; The proposal for only 35% affordable housing (and only 60% of that housing for social rent) means that, out of nearly 1,800 homes, only 315 will be social housing to address the needs of the 7,000 households on Camden's housing waiting list; The proposed open space amounts to only one-third of Camden's policy requirement – only 13,308 sqm compared to the policy requirement of 33,261sqm. http://www.ndpwesthampstead.org.uk/ <p>The developer has offered the Council a financial payment to mitigate the shortfall – but this money doesn't have to be spent in the local area, which is already classed as deficient in open space.²</p> <p>4. I urge Camden Council to reject this application, and work with Landsec to develop a plan that listens and responds to residents' concerns.</p> <p>Key Concerns: The plans don't address overcrowding and access to local Tube Stations</p> <p>5. The plans propose 1,800 new flats, bringing an estimated 3,000 – 4,000 new residents to the area. The development is car-free, and so most of them will use local train and tube stations. The nearest stations - Finchley Road and West Hampstead tube stations and Finchley Road & Frognal overground - are inaccessible to people with disabilities, mobility issues, prams, or heavy luggage. While the Planning Statement refers to safeguarding land for new access routes to the tube stations, and making a financial contribution, there is no detail provided, and no assurances given.</p> <p>6. Arup's transport assessment shows that both Finchley Road and West Hampstead stations will be overstretched by 2031 – West Hampstead in terms of gate capacity, and Finchley Road (where many passengers switch from the Metropolitan line to the Jubilee line) in terms of platform capacity. In terms of train capacity, it is not clear that the assessment takes account of the significant additional development being planned further north, for example at Wembley Park.</p> <p>Key Concerns: The proposed housing mix does not meet Camden Council's policy.</p> <p>7. The Affordable Housing Statement sets out that 35% of the development will be "affordable", assessed as a</p>

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proportion of the floorspace. (It is worth noting that, if the number of units is used as the calculation, it is only 31% affordable.) Only 60% of the affordable housing will be for low-cost rent, available to the 7,000 households on Camden's housing list, the remainder being "intermediate" rent. Thus in a development of nearly 1,800 homes, only 315 will be what people generally understand to be "council housing".

8. Paragraph 3.83(e) of the Local Plan 3 (Policy H4) states that "an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings". It is therefore clear that the proposed development does not meet Camden Council's policy. The developers have repeatedly been told of Camden Council's concern about this – for example in September 2021, as part of the pre-application discussions, David Fowler from Camden's planning department wrote to the developer about the prospect of the council using its powers to compulsory-purchase some of the site, saying "We have discussed the Council using its compulsory purchase powers to ensure the site comes forward comprehensively. Comprehensive redevelopment is a fundamental requirement of the Council on this site, however, for the Council to use its compulsory purchase powers there needs to be significant public benefits. This would be difficult to argue with a poor affordable offer."

2Camden Open Space, Sport & Recreation Study, 2014.

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<https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6>

9. Over 50% of the market homes will be studios/ 1-bedroom flats, between 20% and 50% 2-bedroom flats, and, in the detailed application, only 4% 3-bedroom properties. This will deliver more small units, rather than the 3 and 4-bedroom homes needed to sustain a genuinely mixed community, and which are required by Policy 1 of the Fortune Green and West Hampstead Neighbourhood Plan.

10. Paragraph 18.20 of the Planning Statement indicates that the development will be "Build to Rent". All the homes in the detailed planning application are for rent. This will mean that the development will be a transient population, with people living here for a short time, without a stake in the local area, before leaving to settle somewhere else.

11. While we recognise the difficulty that Camden Council faces in meeting the constraints of the Government's Housing Delivery Test, the impact of the "Build to Rent" approach, and the predominance of small units, will mean that this community will not be diverse and connected, but rather transient and isolated. It will not achieve the "We Make Camden" vision of being a place where people "start well, live well, and age well".

Key concerns: The plans don't deliver the required green open space, even considering plans for land Landsec doesn't own.

12. Camden is the 5th most dense borough in London. People in Camden can enjoy 16 square metres of green space per person, compared to 19 in London and 214 across England. In the light of these stark statistics, the redevelopment of the O2 Shopping Centre and car park site could have been an opportunity to create a lively, green, heart for a new community.

13. Instead, the plans comprise a new community green of 0.35hectares (less than half the size of Fortune Green, which is 0.8ha), a new central square of 0.17ha (smaller than Iverson Road open space, which is 0.2ha), Billy Fury Yard (also 0.17 ha) and a linear park of 0.65ha. It is difficult to find out how wide this is proposed to be, but in September 2021, David Fowler from Camden Council's planning department wrote to the developer as part of the pre-application process stating "The proposed linear park would have a width of 19-23m. We have raised concerns over whether this route would feel like a park or just a route. Under the proposals, the 20m wide linear park would need to work very hard, providing an east/ west thoroughfare, place

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for tables and chairs for the ground floor uses, dwelling space and also play space. It needs to be demonstrated that all these functions can be accommodated within this width. Any opportunities should be taken to increase its width.”

14. The plans fall far short of Camden’s standard for open space which is 9sqm per occupier. Indeed, the application accepts that “the proposed development is unable to meet the full policy requirements in respect to open space” (para 10.42 of the Planning Statement.) It states that to meet the policy it would need to provide 33,261 sqm of open space, whereas the proposals overall only include 13,308sqm – less than half of what is needed. The developer has offered the Council a financial payment to mitigate this – but this money doesn’t have to be spent in the local area, which is already classed as deficient in open space.

15. Further, the proposed community green (the largest and greenest space in the development, with space for children’s play as well as a Multi-Use Games Area (MUGA)), is in the second phase of the site (towards West End Lane), which is on land that Landsec do not own (currently car showrooms). A significant number of the other amenities, including the space earmarked for a health centre, and a creche, is on this land. There is a significant risk that, if planning approval is given for the detailed application, and Landsec are unsuccessful in purchasing the car showroom land, the community green and health centre will never happen.

Key concerns: The height and density of the development is not in line with London Plan Policy.

16. The height and density of the development has been a major concern for residents, as it is out of keeping with buildings in the local area. Most of the immediate area is 5-6 storeys, with some buildings (such as one of the West Hampstead Square / Heritage Lane blocks) rising to 12 storeys. Landsec’s development proposes 6 buildings of up to 16 storeys, and 14 buildings of up to 12 storeys. This does not fit with Policy 2 of the Fortune Green and West Hampstead Neighbourhood Plan which states that development should be “human in scale, in order to maintain and create a positive relationship between buildings and street level activity.” Some residents have suggested that by building higher, greater revenue can be generated to fund benefits such as a higher proportion of affordable housing, or green space. This application, however, fails to meet the Council’s policy in regard to either affordable housing or open space, despite proposing greater height and density than other buildings in the local area.

17. The proposals have been criticised by the Greater London Assembly, who state (Paragraph 86) “The proposals are not considered to be in accordance with London Plan Policy D9 (Part B). There are some concerns that the scale and massing of the Detailed Phase and the Outline Phase 3 results in some areas of non-compliance with London Plan Policy D9 (Part C), including harm to the significance of heritage assets and townscape, which require further consideration.”

18. The height will have a major impact on those living near to the site, especially the residents of Rosemont Road which overlooks the site to the north. Despite repeated requests, none of the drawings in the application demonstrates the impact on their views. There are also significant impacts on views from the Redington/Frognaal, Fitzjohns/Netherhall and South Hampstead Conservation Areas. Historic England, in their response (2 March 2022) note that “The buildings on the site are substantially greater than that found within the conservation areas and would appear in some views from within them and out of them. The volume and scale of the development means that there is a harmful impact to designated heritage assets through development within their setting.”

19. Finally, the height and density of the proposals is exacerbated by the choice of a grey/beige colour palette. The developers have said that the design is informed by St John’s Court (the building atop Waitrose, Finchley Road) but this block itself is an exception to the predominant red brick of most of the buildings on both the Finchley Road and West End Lane sides of the site. Policy 2 of the Fortune Green and West Hampstead Neighbourhood Plan requires “a presumption in favour of a colour palette which reflects, or is in harmony with, the materials of its context.”

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Key concerns: The plans do not meet Camden Council's net-zero carbon targets.

20. A large, surface level car park is not a climate-friendly use of the land and redeveloping this site offers the opportunity for a development that leads the way in sustainability. It is therefore disappointing that Landsec's proposals do not meet today's requirements of the London Plan or Camden Council for net-zero carbon development, let alone what might be the standards when the development is completed in 15 years' time.

The Planning Statement (para 14.51) states "Overall, it is anticipated that the Proposed
4 <https://planning.london.gov.uk/pr/s/planning-application/a0i4J000006cLcdQAE/20220181>

Development would achieve in the region of a 66.3% reduction for the Detailed Proposals and 53% reduction for the Outline Proposals in CO2 emissions beyond the baseline, with the zero-carbon target shortfall to be offset through carbon offset payments." In other words, Landsec are seeking to pay Camden Council a sum estimated to be in the region of £828,345 to offset their failure to meet the Council's requirements. The plans fall far short of Camden's vision to be a leading borough in tackling climate change.

21. Further, London Plan Policy SI2 requires developments referable to the Mayor to "demonstrate actions taken to reduce life-cycle carbon emissions". The Planning Statement (paras 14.41 – 14.47) considers the issue of embodied carbon suggests that demolition of the O2 Shopping Centre and replacement with more modern, low-energy buildings, would result in a comparable "whole life carbon" emission. It suggests that a stretch target of achieving lower whole life carbon emissions would only be achieved if "100% of the substructure, approximately 60% of the superstructure and approximately 90% of the façade embodied carbon ...[was]... retained. In other words, the plans do not achieve the London Plan policy requirements unless some rather heroic assumptions are made about the demolition process.

22. There have been serious flooding issues in this area in recent years, and the plans have not sufficiently addressed this issue. Thames Water has expressed serious concerns. In its response (14 March 2022) it states "Following initial investigations, Thames Water has identified an inability of the existing SURFACE WATER network infrastructure to accommodate the needs of this development proposal." They have said that the proposed run-off rate is "far too high", risking serious flooding of the London Underground lines and properties in South Hampstead ward (See also comments from South Hampstead Flood Action Group). It is not clear from any subsequent documents that this issue has been addressed.

Key concerns: A range of traffic and transport issues have not been adequately addressed.

23. There are a number of concerns about the way that traffic will use the site. The transport, servicing and waste plans do not reflect today's road and pavement usage, let alone anticipate changes over the coming 15 years. Concerns are listed below:

a. It is proposed that buses, refuse trucks and delivery vehicles will enter the site from Finchley Road, and use the part of Blackburn Road which currently runs from Finchley Road to the car showrooms in order to cross the site. Deliveries and refuse collection will use kerbside loading (Paragraph 15.102 of the Planning Statement). This route is also the main through-route for cyclists, who will share the space with vehicles, running considerable risks as these big vehicles pull in and out of the delivery bays.

b. No provision has been made for space for motorcycle delivery drivers at any point on the development. Yet a cursory look at residential streets or developments will show that there are motorcycle delivery drivers (Uber Eats, Deliveroo etc) on every street every evening, and outside every restaurant or café, waiting to pick up jobs. Unless space is designed in from the start, the pavements and open spaces will be constantly used by motorbikes, putting pedestrians at risk, and noise from the bikes will disturb the local residents.

c. No provision has been made for a rest area for bus drivers – they will be expected to use cafes or shops to get a drink, or go to the toilet. There are obvious risks here which could easily have been mitigated.

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24. The plans include a lot of words about improving access to the site from Finchley Road, but this is not backed up by the detail. For example, Paragraph 15.97 of the Planning Statement notes that there will be no new pedestrian crossing over Finchley Road, cutting off this development from residents in Belsize and Frognal. Para 11.28 of the Planning Statement indicates that to service the new "Town Square" there will be a new servicing yard, accessing loading bays from a new entrance from Finchley Road – crossing the pedestrian route up Finchley Road from the tube station.

I urge Camden to work with Landsec and TfL now to look at the way S106 monies can be sensibly used to take the opportunity to improve the highway configuration and safety aspects. Some good design will be of considerable value to the communities and the local shops and businesses in the area.

The S106 monies needs to be of an adequate to sum and should also be used to mitigate the misery of development work that is phased over a long period.

Key concerns: re-provision of Sainsbury's and other O2 shopping centre amenities.

25. Residents have been concerned by the loss of a number of well-used amenities in the current shopping centre, especially the Sainsbury's. Although there are plans for a replacement Sainsbury's, it will be substantially smaller, because of the car-free nature of the development. Landsec say that this accords with retail trends, with fewer people undertaking a "weekly shop" in a car. However, no detail is provided about any "blue badge" parking for those with disabilities to access the new Sainsbury's or other retail stores (because it is part of Phase 3). As a result, concerns have been raised that those who need to drive (such as those with disabilities or shopping with young children) will have to drive further, leading to an increase in car traffic. This should be explored by the Planning Committee.

26. Residents have also expressed concern about the impact of the proposals on other shops on Finchley Road. In pre-application discussions with the developers, David Fowler of Camden's planning department wrote (para 4.8) "Under the proposals there would be a significant loss of commercial uses and an even greater loss of Class E uses and we have significant concerns about the impact on the vitality and viability of the Finchley Road Town Centre." It is not clear that these concerns have been addressed.

Key concerns: construction framework and management

27. The plans envisage the development happening over three phases, preceded by an initial phase demolishing the Homebase store. The expected length of the construction is 10 – 15 years (para 5.62 of the Planning Statement). Phase 1 will comprise the centre of the site (Homebase and car park, Phase 2 the western section (subject to purchase of the car showroom and Builder Depot site), and Phase 3, the eastern section (involving demolition of the O2 Shopping Centre), which is not expected to start for another 5 – 7 years.

28. There are two important implications of this:

a. The residents of Phase 1 will not benefit from any of the amenities (community green, MUGA, health centre, retail offer in the Town Square) for several years while Phases 2 and 3 are under construction.

b. There will be at least 15 years of construction noise and traffic experienced by local residents on all sides, and possibly 10 years of construction experienced by the residents of the Phase 1 development. There is limited detail on the construction management approach at this stage, but Para 16.26 states "In the worst instances, construction noise would create a temporary, short-term, major negative effect that is significant."

29. My experience as a councillor is that Camden Council's Construction Management Team does not have the capacity to enforce adherence to Construction Management Plans (CMPs) for routine building works, and it falls to residents to contact constructors, developers and the Council to highlight CMP breaches. I am therefore concerned about the impact of 15 years of construction on residents living near to the site or on access routes.

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				<p>30. Camden Council's approach to construction management is significantly worse than neighbouring authorities which use a "Code of Considerate Practice". This secures funds from the developers to fund a higher number of Construction Management Officers, who make much more frequent announced and unannounced visits to major construction sites to ensure compliance. If Camden are not willing to change their approach, then residents around the site, and those of the first phase of the development, face 10-15 years of noise, dust and traffic chaos</p>

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2022/0528/P	Cllr Linda Chung	21/03/2023 00:23:31	COMMNT	<p>MY OBJECTIONS</p> <p>I have taken part in Landsec's consultations. We were hoping it would take on board many of community's concerns. We wanted a vibrant development which would incorporate better facilities and more open spaces, but instead, the proposals will cause considerable congestion, and breach Camden's planning policies.</p> <p>1. The site is covered by the Fortune Green & West Hampstead Neighbourhood Plan¹, which earmarks the land between West End Lane and Finchley Road for redevelopment. Unlike the local Conservatives, I agree that a large car park is not a good use of the site. There is a severe housing shortage in the borough, and I support new housing on this site, as envisaged in this Neighbourhood Plan. It is well connected to public transport, and I support a car-free development, which mixes housing, employment, leisure, retail and community uses.</p> <p>2. Throughout all the consultation periods I have consistently called for the proposals to:</p> <ol style="list-style-type: none"> Provide step free access to Finchley Road, and West End Lane tube stations. Meet Camden Council's target of 50% affordable housing, to deliver a mixed community; and Include new amenities, including much-needed green open spaces, places for children and young people to play, and a health centre. <p>3. I have engaged actively with Landsec's consultations over the past two years and encouraged residents to share their views. It is therefore deeply disappointing that there have been no meaningful changes to the plans submitted for approval. On the points listed in para 2:</p> <ol style="list-style-type: none"> There is no clarity on the timing or level of any funding for upgrades of the local tube stations, and no indication that there are active discussions with Camden Council and Transport for London to take this issue forward; The proposal for only 35% affordable housing (and only 60% of that housing for social rent) means that, out of nearly 1,800 homes, only 315 will be social housing to address the needs of the 7,000 households on Camden's housing waiting list; The proposed open space amounts to only one-third of Camden's policy requirement – only 13,308 sqm compared to the policy requirement of 33,261sqm. <p>¹ http://www.ndpwesthampstead.org.uk/</p> <p>The developer has offered the Council a financial payment to mitigate the shortfall – but this money doesn't have to be spent in the local area, which is already classed as deficient in open space.²</p> <p>4. I urge Camden Council to reject this application, and work with Landsec to develop a plan that listens and responds to residents' concerns.</p> <p>Key Concerns: The plans don't address overcrowding and access to local Tube Stations</p> <p>5. The plans propose 1,800 new flats, bringing an estimated 3,000 – 4,000 new residents to the area. The development is car-free, and so most of them will use local train and tube stations. The nearest stations - Finchley Road and West Hampstead tube stations and Finchley Road & Frognal overground - are inaccessible to people with disabilities, mobility issues, prams, or heavy luggage. While the Planning Statement refers to safeguarding land for new access routes to the tube stations, and making a financial contribution, there is no detail provided, and no assurances given.</p> <p>6. Arup's transport assessment shows that both Finchley Road and West Hampstead stations will be overstretched by 2031 – West Hampstead in terms of gate capacity, and Finchley Road (where many passengers switch from the Metropolitan line to the Jubilee line) in terms of platform capacity. In terms of train capacity, it is not clear that the assessment takes account of the significant additional development being planned further north, for example at Wembley Park.</p> <p>Key Concerns: The proposed housing mix does not meet Camden Council's policy.</p> <p>7. The Affordable Housing Statement sets out that 35% of the development will be "affordable", assessed as a</p>

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15. Further, the proposed community green (the largest and greenest space in the development, with space for children’s play as well as a Multi-Use Games Area (MUGA)), is in the second phase of the site (towards West End Lane), which is on land that Landsec do not own (currently car showrooms). A significant number of the other amenities, including the space earmarked for a health centre, and a creche, is on this land. There is a significant risk that, if planning approval is given for the detailed application, and Landsec are unsuccessful in purchasing the car showroom land, the community green and health centre will never happen.

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19. Finally, the height and density of the proposals is exacerbated by the choice of a grey/beige colour palette. The developers have said that the design is informed by St John’s Court (the building atop Waitrose, Finchley Road) but this block itself is an exception to the predominant red brick of most of the buildings on both the Finchley Road and West End Lane sides of the site. Policy 2 of the Fortune Green and West Hampstead Neighbourhood Plan requires “a presumption in favour of a colour palette which reflects, or is in harmony with, the materials of its context.”

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The Planning Statement (para 14.51) states "Overall, it is anticipated that the Proposed Development would achieve in the region of a 66.3% reduction for the Detailed Proposals and 53% reduction for the Outline Proposals in CO2 emissions beyond the baseline, with the zero-carbon target shortfall to be offset through carbon offset payments." In other words, Landsec are seeking to pay Camden Council a sum estimated to be in the region of £828,345 to offset their failure to meet the Council's requirements. The plans fall far short of Camden's vision to be a leading borough in tackling climate change.

21. Further, London Plan Policy SI2 requires developments referable to the Mayor to "demonstrate actions taken to reduce life-cycle carbon emissions". The Planning Statement (paras 14.41 – 14.47) considers the issue of embodied carbon suggests that demolition of the O2 Shopping Centre and replacement with more modern, low-energy buildings, would result in a comparable "whole life carbon" emission. It suggests that a stretch target of achieving lower whole life carbon emissions would only be achieved if "100% of the substructure, approximately 60% of the superstructure and approximately 90% of the façade embodied carbon ...[was]... retained. In other words, the plans do not achieve the London Plan policy requirements unless some rather heroic assumptions are made about the demolition process.

22. There have been serious flooding issues in this area in recent years, and the plans have not sufficiently addressed this issue. Thames Water has expressed serious concerns. In its response (14 March 2022) it states "Following initial investigations, Thames Water has identified an inability of the existing SURFACE WATER network infrastructure to accommodate the needs of this development proposal." They have said that the proposed run-off rate is "far too high", risking serious flooding of the London Underground lines and properties in South Hampstead ward (See also comments from South Hampstead Flood Action Group). It is not clear from any subsequent documents that this issue has been addressed.

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I urge Camden to work with Landsec and TfL now to look at the way S106 monies can be sensibly used to take the opportunity to improve the highway configuration and safety aspects. Some good design will be of considerable value to the communities and the local shops and businesses in the area.

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25. Residents have been concerned by the loss of a number of well-used amenities in the current shopping centre, especially the Sainsbury's. Although there are plans for a replacement Sainsbury's, it will be substantially smaller, because of the car-free nature of the development. Landsec say that this accords with retail trends, with fewer people undertaking a "weekly shop" in a car. However, no detail is provided about any "blue badge" parking for those with disabilities to access the new Sainsbury's or other retail stores (because it is part of Phase 3). As a result, concerns have been raised that those who need to drive (such as those with disabilities or shopping with young children) will have to drive further, leading to an increase in car traffic. This should be explored by the Planning Committee.

26. Residents have also expressed concern about the impact of the proposals on other shops on Finchley Road. In pre-application discussions with the developers, David Fowler of Camden's planning department wrote (para 4.8) "Under the proposals there would be a significant loss of commercial uses and an even greater loss of Class E uses and we have significant concerns about the impact on the vitality and viability of the Finchley Road Town Centre." It is not clear that these concerns have been addressed.

Key concerns: construction framework and management

27. The plans envisage the development happening over three phases, preceded by an initial phase demolishing the Homebase store. The expected length of the construction is 10 – 15 years (para 5.62 of the Planning Statement). Phase 1 will comprise the centre of the site (Homebase and car park, Phase 2 the western section (subject to purchase of the car showroom and Builder Depot site), and Phase 3, the eastern section (involving demolition of the O2 Shopping Centre), which is not expected to start for another 5 – 7 years.

28. There are two important implications of this:

a. The residents of Phase 1 will not benefit from any of the amenities (community green, MUGA, health centre, retail offer in the Town Square) for several years while Phases 2 and 3 are under construction.

b. There will be at least 15 years of construction noise and traffic experienced by local residents on all sides, and possibly 10 years of construction experienced by the residents of the Phase 1 development. There is limited detail on the construction management approach at this stage, but Para 16.26 states "In the worst instances, construction noise would create a temporary, short-term, major negative effect that is significant."

29. My experience as a councillor is that Camden Council's Construction Management Team does not have the capacity to enforce adherence to Construction Management Plans (CMPs) for routine building works, and it falls to residents to contact constructors, developers and the Council to highlight CMP breaches. I am therefore concerned about the impact of 15 years of construction on residents living near to the site or on access routes.

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				<p>30. Camden Council's approach to construction management is significantly worse than neighbouring authorities which use a "Code of Considerate Practice". This secures funds from the developers to fund a higher number of Construction Management Officers, who make much more frequent announced and unannounced visits to major construction sites to ensure compliance. If Camden are not willing to change their approach, then residents around the site, and those of the first phase of the development, face 10-15 years of noise, dust and traffic chaos</p>

Application No:	Consultees Name:	Received:	Comment:	Response:
2022/0528/P	Cllr Linda Chung	21/03/2023 00:23:35	COMMNT	<p>MY OBJECTIONS</p> <p>I have taken part in Landsec's consultations. We were hoping it would take on board many of community's concerns. We wanted a vibrant development which would incorporate better facilities and more open spaces, but instead, the proposals will cause considerable congestion, and breach Camden's planning policies.</p> <ol style="list-style-type: none"> 1. The site is covered by the Fortune Green & West Hampstead Neighbourhood Plan¹, which earmarks the land between West End Lane and Finchley Road for redevelopment. Unlike the local Conservatives, I agree that a large car park is not a good use of the site. There is a severe housing shortage in the borough, and I support new housing on this site, as envisaged in this Neighbourhood Plan. It is well connected to public transport, and I support a car-free development, which mixes housing, employment, leisure, retail and community uses. 2. Throughout all the consultation periods I have consistently called for the proposals to: <ol style="list-style-type: none"> a. Provide step free access to Finchley Road, and West End Lane tube stations. b. Meet Camden Council's target of 50% affordable housing, to deliver a mixed community; and c. Include new amenities, including much-needed green open spaces, places for children and young people to play, and a health centre. 3. I have engaged actively with Landsec's consultations over the past two years and encouraged residents to share their views. It is therefore deeply disappointing that there have been no meaningful changes to the plans submitted for approval. On the points listed in para 2: <ol style="list-style-type: none"> a. There is no clarity on the timing or level of any funding for upgrades of the local tube stations, and no indication that there are active discussions with Camden Council and Transport for London to take this issue forward; b. The proposal for only 35% affordable housing (and only 60% of that housing for social rent) means that, out of nearly 1,800 homes, only 315 will be social housing to address the needs of the 7,000 households on Camden's housing waiting list; c. The proposed open space amounts to only one-third of Camden's policy requirement – only 13,308 sqm compared to the policy requirement of 33,261sqm. <ol style="list-style-type: none"> 1 http://www.ndpwesthampstead.org.uk/ <p>The developer has offered the Council a financial payment to mitigate the shortfall – but this money doesn't have to be spent in the local area, which is already classed as deficient in open space.²</p> <ol style="list-style-type: none"> 4. I urge Camden Council to reject this application, and work with Landsec to develop a plan that listens and responds to residents' concerns. <p>Key Concerns: The plans don't address overcrowding and access to local Tube Stations</p> <ol style="list-style-type: none"> 5. The plans propose 1,800 new flats, bringing an estimated 3,000 – 4,000 new residents to the area. The development is car-free, and so most of them will use local train and tube stations. The nearest stations - Finchley Road and West Hampstead tube stations and Finchley Road & Frognal overground - are inaccessible to people with disabilities, mobility issues, prams, or heavy luggage. While the Planning Statement refers to safeguarding land for new access routes to the tube stations, and making a financial contribution, there is no detail provided, and no assurances given. 6. Arup's transport assessment shows that both Finchley Road and West Hampstead stations will be overstretched by 2031 – West Hampstead in terms of gate capacity, and Finchley Road (where many passengers switch from the Metropolitan line to the Jubilee line) in terms of platform capacity. In terms of train capacity, it is not clear that the assessment takes account of the significant additional development being planned further north, for example at Wembley Park. <p>Key Concerns: The proposed housing mix does not meet Camden Council's policy.</p> <ol style="list-style-type: none"> 7. The Affordable Housing Statement sets out that 35% of the development will be "affordable", assessed as a

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proportion of the floorspace. (It is worth noting that, if the number of units is used as the calculation, it is only 31% affordable.) Only 60% of the affordable housing will be for low-cost rent, available to the 7,000 households on Camden's housing list, the remainder being "intermediate" rent. Thus in a development of nearly 1,800 homes, only 315 will be what people generally understand to be "council housing".

8. Paragraph 3.83(e) of the Local Plan 3 (Policy H4) states that "an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings". It is therefore clear that the proposed development does not meet Camden Council's policy. The developers have repeatedly been told of Camden Council's concern about this – for example in September 2021, as part of the pre-application discussions, David Fowler from Camden's planning department wrote to the developer about the prospect of the council using its powers to compulsory-purchase some of the site, saying "We have discussed the Council using its compulsory purchase powers to ensure the site comes forward comprehensively. Comprehensive redevelopment is a fundamental requirement of the Council on this site, however, for the Council to use its compulsory purchase powers there needs to be significant public benefits. This would be difficult to argue with a poor affordable offer."

2Camden Open Space, Sport & Recreation Study, 2014.

3

<https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6>

9. Over 50% of the market homes will be studios/ 1-bedroom flats, between 20% and 50% 2-bedroom flats, and, in the detailed application, only 4% 3-bedroom properties. This will deliver more small units, rather than the 3 and 4-bedroom homes needed to sustain a genuinely mixed community, and which are required by Policy 1 of the Fortune Green and West Hampstead Neighbourhood Plan.

10. Paragraph 18.20 of the Planning Statement indicates that the development will be "Build to Rent". All the homes in the detailed planning application are for rent. This will mean that the development will be a transient population, with people living here for a short time, without a stake in the local area, before leaving to settle somewhere else.

11. While we recognise the difficulty that Camden Council faces in meeting the constraints of the Government's Housing Delivery Test, the impact of the "Build to Rent" approach, and the predominance of small units, will mean that this community will not be diverse and connected, but rather transient and isolated. It will not achieve the "We Make Camden" vision of being a place where people "start well, live well, and age well".

Key concerns: The plans don't deliver the required green open space, even considering plans for land Landsec doesn't own.

12. Camden is the 5th most dense borough in London. People in Camden can enjoy 16 square metres of green space per person, compared to 19 in London and 214 across England. In the light of these stark statistics, the redevelopment of the O2 Shopping Centre and car park site could have been an opportunity to create a lively, green, heart for a new community.

13. Instead, the plans comprise a new community green of 0.35hectares (less than half the size of Fortune Green, which is 0.8ha), a new central square of 0.17ha (smaller than Iverson Road open space, which is 0.2ha), Billy Fury Yard (also 0.17 ha) and a linear park of 0.65ha. It is difficult to find out how wide this is proposed to be, but in September 2021, David Fowler from Camden Council's planning department wrote to the developer as part of the pre-application process stating "The proposed linear park would have a width of 19-23m. We have raised concerns over whether this route would feel like a park or just a route. Under the proposals, the 20m wide linear park would need to work very hard, providing an east/ west thoroughfare, place

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for tables and chairs for the ground floor uses, dwelling space and also play space. It needs to be demonstrated that all these functions can be accommodated within this width. Any opportunities should be taken to increase its width.”

14. The plans fall far short of Camden’s standard for open space which is 9sqm per occupier. Indeed, the application accepts that “the proposed development is unable to meet the full policy requirements in respect to open space” (para 10.42 of the Planning Statement.) It states that to meet the policy it would need to provide 33,261 sqm of open space, whereas the proposals overall only include 13,308sqm – less than half of what is needed. The developer has offered the Council a financial payment to mitigate this – but this money doesn’t have to be spent in the local area, which is already classed as deficient in open space.

15. Further, the proposed community green (the largest and greenest space in the development, with space for children’s play as well as a Multi-Use Games Area (MUGA)), is in the second phase of the site (towards West End Lane), which is on land that Landsec do not own (currently car showrooms). A significant number of the other amenities, including the space earmarked for a health centre, and a creche, is on this land. There is a significant risk that, if planning approval is given for the detailed application, and Landsec are unsuccessful in purchasing the car showroom land, the community green and health centre will never happen.

Key concerns: The height and density of the development is not in line with London Plan Policy.

16. The height and density of the development has been a major concern for residents, as it is out of keeping with buildings in the local area. Most of the immediate area is 5-6 storeys, with some buildings (such as one of the West Hampstead Square / Heritage Lane blocks) rising to 12 storeys. Landsec’s development proposes 6 buildings of up to 16 storeys, and 14 buildings of up to 12 storeys. This does not fit with Policy 2 of the Fortune Green and West Hampstead Neighbourhood Plan which states that development should be “human in scale, in order to maintain and create a positive relationship between buildings and street level activity.” Some residents have suggested that by building higher, greater revenue can be generated to fund benefits such as a higher proportion of affordable housing, or green space. This application, however, fails to meet the Council’s policy in regard to either affordable housing or open space, despite proposing greater height and density than other buildings in the local area.

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2022/0528/P	Linda Sluys	21/03/2023 07:16:26	OBJ	30. Camden Council's approach to construction management is significantly worse than neighbouring authorities which use a "Code of Considerate Practice". This secures funds from the developers to fund a higher number of Construction Management Officers, who make much more frequent announced and unannounced visits to major construction sites to ensure compliance. If Camden are not willing to change their approach, then residents around the site, and those of the first phase of the development, face 10-15 years of noise, dust and traffic chaos
				I object strongly as per my comments sent via email today and earlier in the process. See my email dated 21/3/2023

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2022/0528/P	Mr E Peel	20/03/2023 15:33:28	OBJ	

Dear Camden Planning Team,

I wish to register with each of you my very strong objections to this development (2022/0528/P), for the many reasons given below.

(This is my updated objection, in the light of the two successive updates to the proposals from the developer, the most recent of which was uploaded onto this site in the February 2023 timeframe).

Please be in no doubt that there is an enormous strength of feeling in the local area against this particular proposal, as the developer has in their consultations throughout the extended process, at best, paid only the most cursory 'lip-service' to the concerns and improvement suggestions of the local residents that surround the site in 4 Conservation Areas. The developer has instead steadfastly ploughed-on with their plans to drastically over-develop the site with dense residential accommodation (1800 units), whilst at the same time removing a large volume of very highly-valued existing indoor retail, food and drink, sports and leisure and community space that is indeed already a safe, all-weather, town centre.

Of particular concern is that Camden's planners appear to have been very prepared to guide the developer towards this gross over-development, even though the most recent draft Site Allocations Local Plan (SALP) for the area ('West Hampstead Interchange'), produced in December 2019 and publicly consulted on in February 2020, only called for around 950 dwellings in the car park area. This raises the serious question as to the basis and justification for almost doubling the number of units to 1800 units without any further public consultation by Camden, when even the previous draft SALP consultation attracted many responses concerned at the impact of the number of new units (950) then being proposed for the car park area?

Most local residents of course fully accept that there is a need for some new residential development on the car park site, as this is obviously not best utilised at present. A quantum of 950 new dwellings oriented towards larger, family-sized, accommodation, and provided in an enlightened, human-scale and sustainable design would have been entirely welcome for both future new residents of the site and for current residents in the surrounding areas. The key issue is the excessive density, building heights and massing, very poor design and the demands on local infrastructure that as many as 1800 new units will bring in a site of only 5.7 hectares in area.

Whilst it is disingenuously termed 'mixed-use' in the title of the application, if both the detailed and the outline proposals are taken together, the residential space will account for around 90% of the newly-developed floor area, and the commercial space only around 10% whilst the community space will only be a derisory 0.1%.

For the entire proposal (detailed and outline), the total eventually planned retail, leisure, food & drink and community space will - at best- still be some 40% less than that already provided by the O2 Centre and the Homebase building, despite there then being some 4000+ extra residents needing to be catered-for on-site. The replacement for the huge and highly-valued, competitively-priced Sainsburys store will be a significantly smaller format store of less than 25% of the size with fewer economies of scale and therefore higher prices/smaller range, and a much smaller replacement gym (with the loss of the pool). There will be no parking, so visitors will have no means to do a large, economical shopping trip.

Most ironically, at the very point where a future '15-minute' city concept for this site seems eminently

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achievable, given a suitably enlightened and human-scale approach to the planning and design, Landsec with the seeming tacit support and encouragement of Camden planners are wilfully destroying the very possibility of achieving it. They will be forcing people to drive (or take cabs) much further afield to near Cricklewood, or to Brent Cross, for larger, good-value shopping trips, now that there will be no large well-priced hypermarket or hardware and gardening and DIY retailers in the vicinity of the O2 site- all having been wastefully and unsustainably demolished by the developer and not adequately replaced.

This is certainly a major lost opportunity which, if not comprehensively addressed before the current deeply-flawed planning proposal is consented, will be one that town planners will increasingly look back on as a 'Case Study' of how to get it so catastrophically wrong; at precisely the time when travel by car is increasingly discouraged. The independent planner hired by the various local community groups has, most insightfully, characterised it as follows: "It is clear that this is a plan which is entirely guided by commercial interests, and is basically 'human warehousing'."

All the major local community groups have come together and sponsored the preparation of a comprehensive Objection to the proposals by a very experienced Planning Professional. The objection is not to further development, and more housing, per se, but rather to this shamefully poor and exploitative plan and design and the enormous quantum of new housing on this site. Their detailed analysis can be found at the following link and I would strongly urge you all to read it so as to gain a good overview of the proposal and its many non-compliances with the various plans and statements that collectively form the 'development plan' which planning applications must be judged against.

The representations on behalf of the entire confederation of local community groups can be found here: http://www.southhampstead.info/uploads/1/3/7/5/137534388/o2_centre_-_representations_on_behalf_of_the_confederation_of_local_community_groups_final.pdf

Daniel Pope, chief planning officer at Camden, told a public meeting in Feb. 2022 that: "Planning law requires that applications for planning permission be determined in accordance with 'the development plan', unless material considerations indicate otherwise."

He then names five plans (London Plan, Camden Local Plan, Camden Site Allocations Plan and two neighbourhood plans) as 'the development plan'. Yet according to the independent planner and official documents, Landsec's plan grossly ignores many of these "required" UK planning guidelines and, as such, should be rejected.

The detailed grounds for objection are as follows:

1) Overbearing Height and Massing

There are 11 tower blocks of 12-15 storeys, 10 blocks of 8-11 stories, and three buildings of 3-6 stories. The Greater London Authority says tall buildings are "not the answer to our housing needs". "Direct access to

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external space for families is absolutely crucial to the successful and healthy functioning of that household and that becomes incredibly difficult with tall buildings.”

This will adversely impact many of the unfortunate new residents who are to be housed there, and will undoubtedly lead to social problems and widespread anti-social, if not criminal, behaviour on the new estate. Please also refer to the comments and concerns of the Metropolitan Police on this matter.

It also ignores the excellent guidance given by the recent report from the London Assembly Planning and Regeneration Committee on Housing Typologies and Design in London, for the post-Covid19 era (September 2021). They conducted an investigation into COVID-19, Housing Typologies and Design in London. A key emphasis was on housing density and the development of tall buildings for residential use in London. Please see the letter to London Councillors from Andrew Boff (AM), the Chair of the London Assembly Planning and Regeneration Committee of 2nd September 2021.

As a result, while Camden has been derelict in not designating areas as suitable or not for tall buildings, the factors specified in the London Plan would lead an objective observer to conclude that the area is not suitable for tall buildings and that a ‘tall building’ is defined as anything taller than 10 storeys. As a result, the development should be limited to 10 storeys – preferably less - under London Plan policy D9. But as it is not, it should be resisted.

The proposals have been criticised by the Greater London Assembly, who state (Paragraph 86) “The proposals are not considered to be in accordance with London Plan Policy D9 (Part B). There are some concerns that the scale and massing of the Detailed Phase and the Outline Phase 3 results in some areas of non-compliance with London Plan Policy D9 (Part C), including harm to the significance of heritage assets and townscape, which require further consideration.” Historic England, in their response (2 March 2022) note that “The buildings on the site are substantially greater than that found within the conservation areas and would appear in some views from within them and out of them. The volume and scale of the development means that there is a harmful impact to designated heritage assets through development within their setting.”

2) Crammed layout and extreme density:

The site, at 315 dwellings per hectare, is officially “superdensity” and almost “hyperdensity” (350 homes per hectare). The design ignores planning rules from The National Model Design Code (3-5x denser), the Fortune Green and West Hampstead Neighborhood Plan, the National Planning Policy Framework, the 2016 London Plan SRQ (2x denser), and London Plan policy D9. An independent planning consultant hired by the local community groups found Landsec’s plan fails all requirements of the Camden Local Plan, bar one. The planner concluded: “Such high and closely-packed buildings are Soviet in concept – except most Soviet developments would be further apart and with more green space.” “Warehousing for humans”.

If we assume that there will be some 4000 residents in the 1800 units then this will equate to a people density of 700 p/ha. This is over 5 times the average population density across Camden, at about 124 p/ha.

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3) Lack of Open Green Space provision

Camden's own Local Plan policy A2, sets out a requirement of 9 sq. metres of open space per occupant. This would imply an open space requirement at the O2 site of 40,000 – 45,000 sq. m. (Based on an average occupation rate of 2.5 people per flat, the development may be expected to accommodate 4,500 residents).

Whereas the Landsec proposals fall very far short of this in offering only:

- 3,000 sq. m in the form of community gardens
- 3,000 sq. m 'Finchley Square'
- A public green (3,800 sq. m) and
- A linear walkway (5,200 sq.m)

Which in total only gives some 15,000 sq. m. This is just a little over one third of Camden's own Local Plan policy requirement – for an area (West Hampstead), that is already officially very green-space deprived.

Camden admits it is taking cash in lieu of meeting that Local Plan target. The independent planner found actual usable public green space is about 12%, not the 50% of the 5.7ha site that Landsec claims. One "park" is actually a narrow corridor and much of the "open space" is paved. The cramped and dark canyon-like spaces between buildings are not conducive to children playing outside, but are highly conducive to muggings and anti-social behaviour. They will also effectively become 'venturi-effect' wind-tunnels in anything more than a light breeze. No-one can seriously consider this to be usable 'open green space', and yet it is egregiously and mendaciously counted as such towards the total of 50% green space claimed by the developer. This shows a contempt by the developer for the well-being and amenity of residents, and Camden must not become complicit in also showing this same contempt for their own future residents on the site.

4) Lack of Affordable housing and lack of Low Cost Rent housing within the 'affordable' category

The Affordable Housing Statement sets out that 35% of the development will be "affordable", assessed as a proportion of the floorspace (GIA). However, most people understand the affordable housing % figure to describe the proportion of actual dwellings (rather than floorspace) that is affordable.

Measured in this way Landsec are only offering around 31.5% affordable housing because the average size of the 'Market rent' units is so small (again in contravention of Camden's SHMA policy- see below) and this skews the apparent % affordable figure (when measured by floor area) in favour of the developer's claim of 35% affordable.

Only 60% of the affordable housing will be for Low-Cost Rent (again measured by % floor area). If this is instead measured as the number of units that are Low Cost Rent out of the total number that are 'affordable' (ie the number of Low Cost Rent units plus the number of Intermediate rent units) then this figure falls to a

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well-below compliant figure of only 55.5% Low Cost Rent, available to the 7,000 households on Camden's housing list, the remainder being "Intermediate" Rent. Thus in a development of nearly 1,800 homes, only around 318 (~18%) units will be what people generally understand to be "council housing".

Paragraph 3.83(e) of the Local Plan (Policy H4) states that "an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings". It is therefore clear that the proposed development falls far short of Camden Council's policy, which is itself strengthened by the matching Policy 1(i) of the Fortune Green & West Hampstead Neighbourhood Plan.

The developers have repeatedly been told of Camden Council's concern about this – for example in September 2021, as part of the pre-application discussions, David Fowler from Camden's planning department wrote to the developer about the prospect of the council using its powers to compulsory-purchase some of the site, saying "We have discussed the Council using its compulsory purchase powers to ensure the site comes forward comprehensively. Comprehensive redevelopment is a fundamental requirement of the Council on this site, however, for the Council to use its compulsory purchase powers there needs to be significant public benefits. This would be difficult to argue with a poor affordable offer."

There was no independent review of Landsec's claim that it could not afford more. A close inspection of the Financial Viability Assessment (Jan 2022) as only slightly modified (seemingly towards an even slightly lower 'viability') by the November 2022 FVA Addendum) prepared by a retained consultancy for Landsec (and arguably with a conflict of interest because the same consultancy were deeply involved in several other aspects of the overall planning submission) shows that the profitability of the development (expressed as IRR) is well below target for both the 'basic model' and 'growth model' scenarios that were costed.

As such, if the development economics are so marginal, then this does not bode well for Phases 2 and 3 when, quite possibly faced with unforeseen/unbudgeted cost inflation, the developer might seek to claim that they can no longer afford to deliver the rest of the Low Cost Rent provision, and so attempt to renege on providing some, or all, of the further 211 Low Cost Rent units initially promised. This would be similar to what Essential Living attempted to do at 100 Avenue Rd (Swiss Cottage) a couple of years ago and which had to be taken to appeal by Camden.

Please see the attached analysis paper addressing the details of affordable housing, dwelling mix and single aspect dwellings, which also provides far more detail on the FVA assumptions.

The other "affordable" units ('Intermediate Rent') would require an annual household income of c. £50,000. The 1,228 private units (across Phases 1,2 & 3) are (in the FVA) optimistically assumed to be sold for "£1 million plus" despite their very small average size, and lack of a parking space, and will then largely be rented out. There is strong resistance by Building Depot and other landowners (car showrooms) to selling their land to Landsec. (Landsec only owns the O2 Centre, car park and Homebase plot). If, finally, only Phase 1 is built, then this would leave just 107 low rent flats in the development.

5) Inadequate Dwelling Mix

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The dwelling mix is very far from meeting the requirements of the Camden Local Plan Policy H7, which states: “The Council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. We will seek to ensure that all housing development, including conversion of existing homes and non-residential properties: a. contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and b. includes a mix of large and small homes”.

The dwelling mix currently offered is heavily skewed towards providing hugely excessive numbers of studio/1 bed flats, and far too few larger 3-bed and 4-bed units (actually no 4-bed units). Some 88% of all units will be studio/1-bed/2-bed, against a Camden Strategic Housing Market Availability Study (SHMA) requirement of only 45% in these categories. Only 13.5% will be 3-bed against a SHMA requirement of 37.5% and there will be no 4-bed units, against a SHMA requirement of 16%. So entirely non-compliant with the SHMA requirement across the board.

The proposals also conflict with the needs of the local area (Local Plan Policy H7 allows divergence from the borough-wide priorities if local needs diverge from borough-wide needs). West Hampstead has the fifth highest number of one-bed flats of any Ward in Camden, after only the three most southern wards and Kilburn. However, unlike the three most southern wards, there is not a university campus nearby, so this is not driven by a genuine local need. There is therefore already a significant under-provision of two- and three-bed flats in West Hampstead, in breach of Local Plan Policy H7 and Neighbourhood Plan Policy 1(ii).

This is already a major problem in West Hampstead, and must not be exacerbated by the O2 Centre redevelopment. It will result in the further loss of longer-term inclusive and cohesive communities, leading to social fragmentation, with many transient renters, and growing families being forced to move out of West Hampstead/Camden altogether, with likely very adverse effects on petty crime in the O2 development area.

For more detail on the dwelling mix, please see the attached analysis paper.

6) Tenure - Rent vs Buy

Paragraph 18.20 of the Planning Statement indicates that the development will be “Build to Rent”. All the homes in the detailed planning application are for rent. This will mean that the development will mostly have a transient population, with people living here for a short time, without a stake in the local area, before leaving to settle somewhere else. Whilst it is recognised that Camden face a difficulty in meeting the constraints of the Government’s Housing Delivery Test, the impact of the “Build to Rent” approach, and the predominance of small units, will mean that this community will not be diverse and connected, but rather transient and isolated. It will not achieve the “We Make Camden” vision of being a place where people “start well, live well, and age well”.

7) Excessive proportion of Single Aspect Dwellings

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Some 45% of the 608 homes proposed in the detailed proposal will be single aspect, broken down as follows: Private – 420 homes, 210 single aspect; Social rent – 104 homes, 10 single aspect; Intermediate – 84 homes, 52 single aspect.

This flagrantly breaches the requirement of London Plan Policy D6 that housing development “should normally avoid the provision of single aspect dwellings.” No effort is made to meet the requirement of London Plan Policy D6 that “a single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating” resulting in a significant policy conflict.

This also contravenes the London Plan Guidance (LPG) on Housing Design Standards with regard to Aspect, Orientation, daylight and sunlight (Section C4) and Thermal Comfort (Section C6.1). Please see the attached analysis paper for more detail on this.

The future residents of the towers will live in an oppressive, lightless, airless, and heartless environment. Many families will have only walls to look at, with loud trains passing on both sides. Going out will mean walking down narrow, often dark, corridors. Many flats will get no direct sunlight at all. One third of the flats will not meet standards for daylight/sunlight. Many occupants will be transient renters and will not help to build any sort of enduring cohesive community..

8) Harm to surrounding Conservation areas

The development is sandwiched tightly between the Redington/Frogna, Fitzjohns & Netherhall, Belsize, South Hampstead, and West End Green Conservation Areas. These conservation areas are defined by similar characters and development typologies namely, they are low- and medium-rise, the most typical building being three to four storeys above ground with a lower ground level. They are primarily red- or yellow-brick terraces and mansion blocks in Victorian or Edwardian vernacular. Unrendered brick is the absolutely dominant material in the conservation area, and both palette and materials are traditional in nature.

Furthermore, while the proposed development is not located within a Conservation Area, is it located in the Fortune Green & West Hampstead Neighbourhood Plan Area. This contains ‘Conservation Area-like’ protections in Policy 2, namely development that:

“Is human in scale”

“Has regard to the form, function, structure, and heritage of its context, including the scale, mass”

“Is sensitive to the height of existing buildings”, including that tall buildings should “avoid any negative impact” (emphasis ours) on the West End Green or South Hampstead conservation areas.

“Has regard to the impact on local views” as identified in A11 of the Neighbourhood Plan. This designates views southwards, out of the Neighbourhood Plan Area across South Hampstead: views that would be obliterated by the development.

Given the above requirements, more careful consideration should be given to the impact on conservation. Instead, the developer has acted as though it being located a few metres outside these conservation areas means that it does not need to have any regard to conservation. So, another of many reasons that it should

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therefore be resisted.

For example, a number of the simulation pictures offered in the planning documentation to illustrate the visibility of the tall and closely-packed buildings in the O2 site proposals when viewed from key points in the South Hampstead Conservation Area, appear to have been framed as 'wide-angle' photographs (eg. 28mm lens), which of course greatly diminishes the impact and visibility of more distant objects. This is wholly misleading, not to say mendacious, and shows bad faith on the part of the developers and their agent that did this work. The views from Priory Rd and Fairhazel Gardens and Broadhurst Gardens looking north will be particularly egregious and the looming mass of buildings will generally do substantial harm to the vistas from this and many other CAs. Please see the example pictures in the attached analysis document.

9) Demolition of O2 Centre In conflict with Camden's Climate Change and Clean Air Action Plan? Amenity retention and Cost reduction opportunity through re-purposing/refurbishing the O2 Centre rather than demolishing

If this enormous proposed development is genuinely so marginal in its viability as the FVA currently seems to show, then LandSec need to be required to significantly reduce the costs and scope of their development, so as to achieve a sufficiently large rate of return that allows a much greater proportion of provision of affordable housing. One obvious way to reduce costs is to preserve (instead of demolishing), and re-purpose/refurbish as necessary, the O2 Centre itself.

The idea of demolishing and carting-away a huge, sound structure that is only some 22 years old, with huge amounts of embodied carbon in both the concrete and steel, only to have to then rebuild from scratch, using high-carbon materials, many (but by no means all- no swimming pool, no very large large supermarket) of the same amenities that it currently contains, is an act of almost criminal environmental vandalism in the current Climate Emergency.

In the words of a Camden Council Planning officer: 'Land Sec will need to demonstrate that the redevelopment of the O2 Centre is more sustainable than refurbishing the building. To do this they will need to submit a whole life carbon assessment'. The embodied carbon as energy consumed in manufacturing, delivering and installing the materials to build, and fit-out these buildings over a planned 15 year construction and their disposal at end of life as well as operational carbon associated with electricity, gas and other fuels used for heating, cooling, ventilation, lighting, hot water, and other electrical equipment must be accounted for.

Unnecessary construction (ie. the need to rebuild from scratch many of the highly-valued amenities and safe, indoor, social spaces already very well provided by the existing O2 Centre) also has a significant and negative impact on local air quality and potentially public health, if it is not carefully managed. Construction activity is responsible for 4% of NO2 emissions, 24% of PM10 emissions and 9% of PM2.5 emissions in Camden.

The current proposals indicate a deeply-unattractive smaller replacement set of facilities on a bleak and windswept 2-storey slope down from Finchley Road to the body of the site. This in no way compensates for the safe, indoor environment provided by the current O2 Centre and detracts from the Finchley Rd 'Town Centre'. If the O2 Centre were to be retained, then the 'Health Centre' that Landsec are vaguely offering to create for the end of Phase 3 in 15 years time, could be created within the O2 Centre in Phase 1/2 timescales, in time for the huge increase in health service demand that 2000 new residents (by then) will generate.

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Retention of the O2 Centre also aligns fully with the most recent draft Site Allocations Local Plan (Camden SALP) document dating from late 2019/early 2020, which envisaged 950 new dwellings (not the current 1900) in the car park and Homepage areas only, and retention of the O2 Centre itself. This document was the last that was fully publicly consulted-upon- please see:

<https://growthsalp.commonplace.is/proposals/west-hampstead-interchange>

In addition to the huge and wholly avoidable excess carbon emissions costs, the financial cost of demolishing the O2 structure itself is some £3.1M. Then the cost of rebuilding to re-provide the greatly reduced amount of replacement commercial and retail floorspace that is currently being offered by the developer (which will eventually (after Phase 3 completion in 16 years time!) still only be some 60% of the floorspace that the O2 Centre currently already provides) will be approximately £21.6M, so about £24.6M in total. As an observation, if the full floor area of the current O2 Centre structure were to be rebuilt in various locations to re-accommodate all of its former amenities and retail outlets (which Landsec are not offering to do), then this would cost around £58.5M including demolition. (Note: All cost estimates obtained from the FVA).

10) Huge impact on local infrastructure, including transport at West Hampstead and Finchley Rd tube stations

The scheme will swamp local Infrastructure, utilities, and community assets. Local GP surgeries are already in short supply, NHS England says. What will be the effect on rubbish collection (already inadequate), police, the fire station, schools, recreation centres, cafes, and shops? It will be a major backward step for both existing and new local residents. Landsec is offering nothing to compensate for all this, except for "promising" a small "health centre" eventually. Camden has given no reassurances on any of these concerns.

West End Lane and Finchley Road will face dangerously overcrowded pavements and roads, with some 4,000 new residents in the area. Landsec plans no parking for its residents, but will people living in £1 million+ flats not own a car? Where will they park it? Deliveries to 4,000 new people will cause massive congestion at site entrances.

Public transport will be overwhelmed. Pre-Covid, the Jubilee line was already running at 115% capacity, the Metropolitan Line at 97%. At rush hour, pavements and platforms and buses are already crowded. Landsec has ignored pleas to support the creation new entrances to the West Hampstead and Finchley Road tube stations, at least one of which would also have 'step-free' access. TfL appears not to have the inclination or the resources to achieve this on its own.

11) Water, sewage and flooding dangers

The South and West Hampstead areas are already subject to flooding due to storm rainfalls - most recently in 2021. From Camden's 'public consultation': "Thames Water has identified an inability of the existing surface water network infrastructure to accommodate the needs of this development proposal". Thames warns of low or no water pressure unless the network is upgraded. The O2 development will create an additional 260 litres of waste water per second. Thames Water wants this reduced seven-fold to 36 litres per second. Thames is trying to get Landsec's cooperation and to get "tankage" introduced. It is unclear how many of Thames'

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concerns have been addressed. Again, no assurances from Camden.

Please reject this application

For all these reasons I would implore you to reject the current proposal, as it is non-compliant in so many areas, and will cause lasting adverse effects on existing residents and provide a poor environment for the new residents.

The developer should be asked to work with the local communities to genuinely listen to their suggestions and then to come back with a less expensive and scaled-down application for around 950 new dwellings, of which a much larger percentage should be affordable (measured by % of units, not by % of floor area). This also would be in-line with the most recently consulted-upon draft Site Allocation Local Plan for the West Hampstead Interchange area dating from 2019/20.

Many thanks for your consideration of the above.

Best regards,

Eric Peel

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2022/0528/P	Cllr Linda Chung	21/03/2023 00:22:57	COMMNT	<p>MY OBJECTIONS</p> <p>I have taken part in Landsec's consultations. We were hoping it would take on board many of community's concerns. We wanted a vibrant development which would incorporate better facilities and more open spaces, but instead, the proposals will cause considerable congestion, and breach Camden's planning policies.</p> <p>1. The site is covered by the Fortune Green & West Hampstead Neighbourhood Plan¹, which earmarks the land between West End Lane and Finchley Road for redevelopment. Unlike the local Conservatives, I agree that a large car park is not a good use of the site. There is a severe housing shortage in the borough, and I support new housing on this site, as envisaged in this Neighbourhood Plan. It is well connected to public transport, and I support a car-free development, which mixes housing, employment, leisure, retail and community uses.</p> <p>2. Throughout all the consultation periods I have consistently called for the proposals to:</p> <ol style="list-style-type: none"> Provide step free access to Finchley Road, and West End Lane tube stations. Meet Camden Council's target of 50% affordable housing, to deliver a mixed community; and Include new amenities, including much-needed green open spaces, places for children and young people to play, and a health centre. <p>3. I have engaged actively with Landsec's consultations over the past two years and encouraged residents to share their views. It is therefore deeply disappointing that there have been no meaningful changes to the plans submitted for approval. On the points listed in para 2:</p> <ol style="list-style-type: none"> There is no clarity on the timing or level of any funding for upgrades of the local tube stations, and no indication that there are active discussions with Camden Council and Transport for London to take this issue forward; The proposal for only 35% affordable housing (and only 60% of that housing for social rent) means that, out of nearly 1,800 homes, only 315 will be social housing to address the needs of the 7,000 households on Camden's housing waiting list; The proposed open space amounts to only one-third of Camden's policy requirement – only 13,308 sqm compared to the policy requirement of 33,261sqm. http://www.ndpwesthampstead.org.uk/ <p>The developer has offered the Council a financial payment to mitigate the shortfall – but this money doesn't have to be spent in the local area, which is already classed as deficient in open space.²</p> <p>4. I urge Camden Council to reject this application, and work with Landsec to develop a plan that listens and responds to residents' concerns.</p> <p>Key Concerns: The plans don't address overcrowding and access to local Tube Stations</p> <p>5. The plans propose 1,800 new flats, bringing an estimated 3,000 – 4,000 new residents to the area. The development is car-free, and so most of them will use local train and tube stations. The nearest stations - Finchley Road and West Hampstead tube stations and Finchley Road & Frognal overground - are inaccessible to people with disabilities, mobility issues, prams, or heavy luggage. While the Planning Statement refers to safeguarding land for new access routes to the tube stations, and making a financial contribution, there is no detail provided, and no assurances given.</p> <p>6. Arup's transport assessment shows that both Finchley Road and West Hampstead stations will be overstretched by 2031 – West Hampstead in terms of gate capacity, and Finchley Road (where many passengers switch from the Metropolitan line to the Jubilee line) in terms of platform capacity. In terms of train capacity, it is not clear that the assessment takes account of the significant additional development being planned further north, for example at Wembley Park.</p> <p>Key Concerns: The proposed housing mix does not meet Camden Council's policy.</p> <p>7. The Affordable Housing Statement sets out that 35% of the development will be "affordable", assessed as a</p>

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proportion of the floorspace. (It is worth noting that, if the number of units is used as the calculation, it is only 31% affordable.) Only 60% of the affordable housing will be for low-cost rent, available to the 7,000 households on Camden's housing list, the remainder being "intermediate" rent. Thus in a development of nearly 1,800 homes, only 315 will be what people generally understand to be "council housing".

8. Paragraph 3.83(e) of the Local Plan 3 (Policy H4) states that "an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings". It is therefore clear that the proposed development does not meet Camden Council's policy. The developers have repeatedly been told of Camden Council's concern about this – for example in September 2021, as part of the pre-application discussions, David Fowler from Camden's planning department wrote to the developer about the prospect of the council using its powers to compulsory-purchase some of the site, saying "We have discussed the Council using its compulsory purchase powers to ensure the site comes forward comprehensively. Comprehensive redevelopment is a fundamental requirement of the Council on this site, however, for the Council to use its compulsory purchase powers there needs to be significant public benefits. This would be difficult to argue with a poor affordable offer."

2Camden Open Space, Sport & Recreation Study, 2014.

3

<https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6>

9. Over 50% of the market homes will be studios/ 1-bedroom flats, between 20% and 50% 2-bedroom flats, and, in the detailed application, only 4% 3-bedroom properties. This will deliver more small units, rather than the 3 and 4-bedroom homes needed to sustain a genuinely mixed community, and which are required by Policy 1 of the Fortune Green and West Hampstead Neighbourhood Plan.

10. Paragraph 18.20 of the Planning Statement indicates that the development will be "Build to Rent". All the homes in the detailed planning application are for rent. This will mean that the development will be a transient population, with people living here for a short time, without a stake in the local area, before leaving to settle somewhere else.

11. While we recognise the difficulty that Camden Council faces in meeting the constraints of the Government's Housing Delivery Test, the impact of the "Build to Rent" approach, and the predominance of small units, will mean that this community will not be diverse and connected, but rather transient and isolated. It will not achieve the "We Make Camden" vision of being a place where people "start well, live well, and age well".

Key concerns: The plans don't deliver the required green open space, even considering plans for land Landsec doesn't own.

12. Camden is the 5th most dense borough in London. People in Camden can enjoy 16 square metres of green space per person, compared to 19 in London and 214 across England. In the light of these stark statistics, the redevelopment of the O2 Shopping Centre and car park site could have been an opportunity to create a lively, green, heart for a new community.

13. Instead, the plans comprise a new community green of 0.35hectares (less than half the size of Fortune Green, which is 0.8ha), a new central square of 0.17ha (smaller than Iverson Road open space, which is 0.2ha), Billy Fury Yard (also 0.17 ha) and a linear park of 0.65ha. It is difficult to find out how wide this is proposed to be, but in September 2021, David Fowler from Camden Council's planning department wrote to the developer as part of the pre-application process stating "The proposed linear park would have a width of 19-23m. We have raised concerns over whether this route would feel like a park or just a route. Under the proposals, the 20m wide linear park would need to work very hard, providing an east/ west thoroughfare, place

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for tables and chairs for the ground floor uses, dwelling space and also play space. It needs to be demonstrated that all these functions can be accommodated within this width. Any opportunities should be taken to increase its width.”

14. The plans fall far short of Camden’s standard for open space which is 9sqm per occupier. Indeed, the application accepts that “the proposed development is unable to meet the full policy requirements in respect to open space” (para 10.42 of the Planning Statement.) It states that to meet the policy it would need to provide 33,261 sqm of open space, whereas the proposals overall only include 13,308sqm – less than half of what is needed. The developer has offered the Council a financial payment to mitigate this – but this money doesn’t have to be spent in the local area, which is already classed as deficient in open space.

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19. Finally, the height and density of the proposals is exacerbated by the choice of a grey/beige colour palette. The developers have said that the design is informed by St John’s Court (the building atop Waitrose, Finchley Road) but this block itself is an exception to the predominant red brick of most of the buildings on both the Finchley Road and West End Lane sides of the site. Policy 2 of the Fortune Green and West Hampstead Neighbourhood Plan requires “a presumption in favour of a colour palette which reflects, or is in harmony with, the materials of its context.”

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Development would achieve in the region of a 66.3% reduction for the Detailed Proposals and 53% reduction for the Outline Proposals in CO2 emissions beyond the baseline, with the zero-carbon target shortfall to be offset through carbon offset payments." In other words, Landsec are seeking to pay Camden Council a sum estimated to be in the region of £828,345 to offset their failure to meet the Council's requirements. The plans fall far short of Camden's vision to be a leading borough in tackling climate change.

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I urge Camden to work with Landsec and TfL now to look at the way S106 monies can be sensibly used to take the opportunity to improve the highway configuration and safety aspects. Some good design will be of considerable value to the communities and the local shops and businesses in the area.

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27. The plans envisage the development happening over three phases, preceded by an initial phase demolishing the Homebase store. The expected length of the construction is 10 – 15 years (para 5.62 of the Planning Statement). Phase 1 will comprise the centre of the site (Homebase and car park, Phase 2 the western section (subject to purchase of the car showroom and Builder Depot site), and Phase 3, the eastern section (involving demolition of the O2 Shopping Centre), which is not expected to start for another 5 – 7 years.

28. There are two important implications of this:

a. The residents of Phase 1 will not benefit from any of the amenities (community green, MUGA, health centre, retail offer in the Town Square) for several years while Phases 2 and 3 are under construction.

b. There will be at least 15 years of construction noise and traffic experienced by local residents on all sides, and possibly 10 years of construction experienced by the residents of the Phase 1 development. There is limited detail on the construction management approach at this stage, but Para 16.26 states "In the worst instances, construction noise would create a temporary, short-term, major negative effect that is significant."

29. My experience as a councillor is that Camden Council's Construction Management Team does not have the capacity to enforce adherence to Construction Management Plans (CMPs) for routine building works, and it falls to residents to contact constructors, developers and the Council to highlight CMP breaches. I am therefore concerned about the impact of 15 years of construction on residents living near to the site or on access routes.

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2022/0528/P	Cllr Linda Chung	21/03/2023 00:23:02	COMMNT	<p>MY OBJECTIONS</p> <p>I have taken part in Landsec's consultations. We were hoping it would take on board many of community's concerns. We wanted a vibrant development which would incorporate better facilities and more open spaces, but instead, the proposals will cause considerable congestion, and breach Camden's planning policies.</p> <p>1. The site is covered by the Fortune Green & West Hampstead Neighbourhood Plan¹, which earmarks the land between West End Lane and Finchley Road for redevelopment. Unlike the local Conservatives, I agree that a large car park is not a good use of the site. There is a severe housing shortage in the borough, and I support new housing on this site, as envisaged in this Neighbourhood Plan. It is well connected to public transport, and I support a car-free development, which mixes housing, employment, leisure, retail and community uses.</p> <p>2. Throughout all the consultation periods I have consistently called for the proposals to:</p> <ol style="list-style-type: none"> Provide step free access to Finchley Road, and West End Lane tube stations. Meet Camden Council's target of 50% affordable housing, to deliver a mixed community; and Include new amenities, including much-needed green open spaces, places for children and young people to play, and a health centre. <p>3. I have engaged actively with Landsec's consultations over the past two years and encouraged residents to share their views. It is therefore deeply disappointing that there have been no meaningful changes to the plans submitted for approval. On the points listed in para 2:</p> <ol style="list-style-type: none"> There is no clarity on the timing or level of any funding for upgrades of the local tube stations, and no indication that there are active discussions with Camden Council and Transport for London to take this issue forward; The proposal for only 35% affordable housing (and only 60% of that housing for social rent) means that, out of nearly 1,800 homes, only 315 will be social housing to address the needs of the 7,000 households on Camden's housing waiting list; The proposed open space amounts to only one-third of Camden's policy requirement – only 13,308 sqm compared to the policy requirement of 33,261sqm. 1 http://www.ndpwesthampstead.org.uk/ <p>The developer has offered the Council a financial payment to mitigate the shortfall – but this money doesn't have to be spent in the local area, which is already classed as deficient in open space.²</p> <p>4. I urge Camden Council to reject this application, and work with Landsec to develop a plan that listens and responds to residents' concerns.</p> <p>Key Concerns: The plans don't address overcrowding and access to local Tube Stations</p> <p>5. The plans propose 1,800 new flats, bringing an estimated 3,000 – 4,000 new residents to the area. The development is car-free, and so most of them will use local train and tube stations. The nearest stations - Finchley Road and West Hampstead tube stations and Finchley Road & Frognal overground - are inaccessible to people with disabilities, mobility issues, prams, or heavy luggage. While the Planning Statement refers to safeguarding land for new access routes to the tube stations, and making a financial contribution, there is no detail provided, and no assurances given.</p> <p>6. Arup's transport assessment shows that both Finchley Road and West Hampstead stations will be overstretched by 2031 – West Hampstead in terms of gate capacity, and Finchley Road (where many passengers switch from the Metropolitan line to the Jubilee line) in terms of platform capacity. In terms of train capacity, it is not clear that the assessment takes account of the significant additional development being planned further north, for example at Wembley Park.</p> <p>Key Concerns: The proposed housing mix does not meet Camden Council's policy.</p> <p>7. The Affordable Housing Statement sets out that 35% of the development will be "affordable", assessed as a</p>

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proportion of the floorspace. (It is worth noting that, if the number of units is used as the calculation, it is only 31% affordable.) Only 60% of the affordable housing will be for low-cost rent, available to the 7,000 households on Camden's housing list, the remainder being "intermediate" rent. Thus in a development of nearly 1,800 homes, only 315 will be what people generally understand to be "council housing".

8. Paragraph 3.83(e) of the Local Plan 3 (Policy H4) states that "an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings". It is therefore clear that the proposed development does not meet Camden Council's policy. The developers have repeatedly been told of Camden Council's concern about this – for example in September 2021, as part of the pre-application discussions, David Fowler from Camden's planning department wrote to the developer about the prospect of the council using its powers to compulsory-purchase some of the site, saying "We have discussed the Council using its compulsory purchase powers to ensure the site comes forward comprehensively. Comprehensive redevelopment is a fundamental requirement of the Council on this site, however, for the Council to use its compulsory purchase powers there needs to be significant public benefits. This would be difficult to argue with a poor affordable offer."

2Camden Open Space, Sport & Recreation Study, 2014.

3

<https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6>

9. Over 50% of the market homes will be studios/ 1-bedroom flats, between 20% and 50% 2-bedroom flats, and, in the detailed application, only 4% 3-bedroom properties. This will deliver more small units, rather than the 3 and 4-bedroom homes needed to sustain a genuinely mixed community, and which are required by Policy 1 of the Fortune Green and West Hampstead Neighbourhood Plan.

10. Paragraph 18.20 of the Planning Statement indicates that the development will be "Build to Rent". All the homes in the detailed planning application are for rent. This will mean that the development will be a transient population, with people living here for a short time, without a stake in the local area, before leaving to settle somewhere else.

11. While we recognise the difficulty that Camden Council faces in meeting the constraints of the Government's Housing Delivery Test, the impact of the "Build to Rent" approach, and the predominance of small units, will mean that this community will not be diverse and connected, but rather transient and isolated. It will not achieve the "We Make Camden" vision of being a place where people "start well, live well, and age well".

Key concerns: The plans don't deliver the required green open space, even considering plans for land Landsec doesn't own.

12. Camden is the 5th most dense borough in London. People in Camden can enjoy 16 square metres of green space per person, compared to 19 in London and 214 across England. In the light of these stark statistics, the redevelopment of the O2 Shopping Centre and car park site could have been an opportunity to create a lively, green, heart for a new community.

13. Instead, the plans comprise a new community green of 0.35hectares (less than half the size of Fortune Green, which is 0.8ha), a new central square of 0.17ha (smaller than Iverson Road open space, which is 0.2ha), Billy Fury Yard (also 0.17 ha) and a linear park of 0.65ha. It is difficult to find out how wide this is proposed to be, but in September 2021, David Fowler from Camden Council's planning department wrote to the developer as part of the pre-application process stating "The proposed linear park would have a width of 19-23m. We have raised concerns over whether this route would feel like a park or just a route. Under the proposals, the 20m wide linear park would need to work very hard, providing an east/ west thoroughfare, place

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				<p>30. Camden Council's approach to construction management is significantly worse than neighbouring authorities which use a "Code of Considerate Practice". This secures funds from the developers to fund a higher number of Construction Management Officers, who make much more frequent announced and unannounced visits to major construction sites to ensure compliance. If Camden are not willing to change their approach, then residents around the site, and those of the first phase of the development, face 10-15 years of noise, dust and traffic chaos</p>

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2022/0528/P	Cllr Linda Chung	21/03/2023 00:23:24	COMMNT	<p>MY OBJECTIONS</p> <p>I have taken part in Landsec's consultations. We were hoping it would take on board many of community's concerns. We wanted a vibrant development which would incorporate better facilities and more open spaces, but instead, the proposals will cause considerable congestion, and breach Camden's planning policies.</p> <p>1. The site is covered by the Fortune Green & West Hampstead Neighbourhood Plan¹, which earmarks the land between West End Lane and Finchley Road for redevelopment. Unlike the local Conservatives, I agree that a large car park is not a good use of the site. There is a severe housing shortage in the borough, and I support new housing on this site, as envisaged in this Neighbourhood Plan. It is well connected to public transport, and I support a car-free development, which mixes housing, employment, leisure, retail and community uses.</p> <p>2. Throughout all the consultation periods I have consistently called for the proposals to:</p> <ol style="list-style-type: none"> Provide step free access to Finchley Road, and West End Lane tube stations. Meet Camden Council's target of 50% affordable housing, to deliver a mixed community; and Include new amenities, including much-needed green open spaces, places for children and young people to play, and a health centre. <p>3. I have engaged actively with Landsec's consultations over the past two years and encouraged residents to share their views. It is therefore deeply disappointing that there have been no meaningful changes to the plans submitted for approval. On the points listed in para 2:</p> <ol style="list-style-type: none"> There is no clarity on the timing or level of any funding for upgrades of the local tube stations, and no indication that there are active discussions with Camden Council and Transport for London to take this issue forward; The proposal for only 35% affordable housing (and only 60% of that housing for social rent) means that, out of nearly 1,800 homes, only 315 will be social housing to address the needs of the 7,000 households on Camden's housing waiting list; The proposed open space amounts to only one-third of Camden's policy requirement – only 13,308 sqm compared to the policy requirement of 33,261sqm. 1 http://www.ndpwesthampstead.org.uk/ <p>The developer has offered the Council a financial payment to mitigate the shortfall – but this money doesn't have to be spent in the local area, which is already classed as deficient in open space.²</p> <p>4. I urge Camden Council to reject this application, and work with Landsec to develop a plan that listens and responds to residents' concerns.</p> <p>Key Concerns: The plans don't address overcrowding and access to local Tube Stations</p> <p>5. The plans propose 1,800 new flats, bringing an estimated 3,000 – 4,000 new residents to the area. The development is car-free, and so most of them will use local train and tube stations. The nearest stations - Finchley Road and West Hampstead tube stations and Finchley Road & Frognal overground - are inaccessible to people with disabilities, mobility issues, prams, or heavy luggage. While the Planning Statement refers to safeguarding land for new access routes to the tube stations, and making a financial contribution, there is no detail provided, and no assurances given.</p> <p>6. Arup's transport assessment shows that both Finchley Road and West Hampstead stations will be overstretched by 2031 – West Hampstead in terms of gate capacity, and Finchley Road (where many passengers switch from the Metropolitan line to the Jubilee line) in terms of platform capacity. In terms of train capacity, it is not clear that the assessment takes account of the significant additional development being planned further north, for example at Wembley Park.</p> <p>Key Concerns: The proposed housing mix does not meet Camden Council's policy.</p> <p>7. The Affordable Housing Statement sets out that 35% of the development will be "affordable", assessed as a</p>

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proportion of the floorspace. (It is worth noting that, if the number of units is used as the calculation, it is only 31% affordable.) Only 60% of the affordable housing will be for low-cost rent, available to the 7,000 households on Camden's housing list, the remainder being "intermediate" rent. Thus in a development of nearly 1,800 homes, only 315 will be what people generally understand to be "council housing".

8. Paragraph 3.83(e) of the Local Plan 3 (Policy H4) states that "an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings". It is therefore clear that the proposed development does not meet Camden Council's policy. The developers have repeatedly been told of Camden Council's concern about this – for example in September 2021, as part of the pre-application discussions, David Fowler from Camden's planning department wrote to the developer about the prospect of the council using its powers to compulsory-purchase some of the site, saying "We have discussed the Council using its compulsory purchase powers to ensure the site comes forward comprehensively. Comprehensive redevelopment is a fundamental requirement of the Council on this site, however, for the Council to use its compulsory purchase powers there needs to be significant public benefits. This would be difficult to argue with a poor affordable offer."

2Camden Open Space, Sport & Recreation Study, 2014.

3

<https://www.camden.gov.uk/documents/20142/4820180/Local+Plan.pdf/ce6e992a-91f9-3a60-720c-70290fab78a6>

9. Over 50% of the market homes will be studios/ 1-bedroom flats, between 20% and 50% 2-bedroom flats, and, in the detailed application, only 4% 3-bedroom properties. This will deliver more small units, rather than the 3 and 4-bedroom homes needed to sustain a genuinely mixed community, and which are required by Policy 1 of the Fortune Green and West Hampstead Neighbourhood Plan.

10. Paragraph 18.20 of the Planning Statement indicates that the development will be "Build to Rent". All the homes in the detailed planning application are for rent. This will mean that the development will be a transient population, with people living here for a short time, without a stake in the local area, before leaving to settle somewhere else.

11. While we recognise the difficulty that Camden Council faces in meeting the constraints of the Government's Housing Delivery Test, the impact of the "Build to Rent" approach, and the predominance of small units, will mean that this community will not be diverse and connected, but rather transient and isolated. It will not achieve the "We Make Camden" vision of being a place where people "start well, live well, and age well".

Key concerns: The plans don't deliver the required green open space, even considering plans for land Landsec doesn't own.

12. Camden is the 5th most dense borough in London. People in Camden can enjoy 16 square metres of green space per person, compared to 19 in London and 214 across England. In the light of these stark statistics, the redevelopment of the O2 Shopping Centre and car park site could have been an opportunity to create a lively, green, heart for a new community.

13. Instead, the plans comprise a new community green of 0.35hectares (less than half the size of Fortune Green, which is 0.8ha), a new central square of 0.17ha (smaller than Iverson Road open space, which is 0.2ha), Billy Fury Yard (also 0.17 ha) and a linear park of 0.65ha. It is difficult to find out how wide this is proposed to be, but in September 2021, David Fowler from Camden Council's planning department wrote to the developer as part of the pre-application process stating "The proposed linear park would have a width of 19-23m. We have raised concerns over whether this route would feel like a park or just a route. Under the proposals, the 20m wide linear park would need to work very hard, providing an east/ west thoroughfare, place

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for tables and chairs for the ground floor uses, dwelling space and also play space. It needs to be demonstrated that all these functions can be accommodated within this width. Any opportunities should be taken to increase its width.”

14. The plans fall far short of Camden’s standard for open space which is 9sqm per occupier. Indeed, the application accepts that “the proposed development is unable to meet the full policy requirements in respect to open space” (para 10.42 of the Planning Statement.) It states that to meet the policy it would need to provide 33,261 sqm of open space, whereas the proposals overall only include 13,308sqm – less than half of what is needed. The developer has offered the Council a financial payment to mitigate this – but this money doesn’t have to be spent in the local area, which is already classed as deficient in open space.

15. Further, the proposed community green (the largest and greenest space in the development, with space for children’s play as well as a Multi-Use Games Area (MUGA)), is in the second phase of the site (towards West End Lane), which is on land that Landsec do not own (currently car showrooms). A significant number of the other amenities, including the space earmarked for a health centre, and a creche, is on this land. There is a significant risk that, if planning approval is given for the detailed application, and Landsec are unsuccessful in purchasing the car showroom land, the community green and health centre will never happen.

Key concerns: The height and density of the development is not in line with London Plan Policy.

16. The height and density of the development has been a major concern for residents, as it is out of keeping with buildings in the local area. Most of the immediate area is 5-6 storeys, with some buildings (such as one of the West Hampstead Square / Heritage Lane blocks) rising to 12 storeys. Landsec’s development proposes 6 buildings of up to 16 storeys, and 14 buildings of up to 12 storeys. This does not fit with Policy 2 of the Fortune Green and West Hampstead Neighbourhood Plan which states that development should be “human in scale, in order to maintain and create a positive relationship between buildings and street level activity.” Some residents have suggested that by building higher, greater revenue can be generated to fund benefits such as a higher proportion of affordable housing, or green space. This application, however, fails to meet the Council’s policy in regard to either affordable housing or open space, despite proposing greater height and density than other buildings in the local area.

17. The proposals have been criticised by the Greater London Assembly, who state (Paragraph 86) “The proposals are not considered to be in accordance with London Plan Policy D9 (Part B). There are some concerns that the scale and massing of the Detailed Phase and the Outline Phase 3 results in some areas of non-compliance with London Plan Policy D9 (Part C), including harm to the significance of heritage assets and townscape, which require further consideration.”

18. The height will have a major impact on those living near to the site, especially the residents of Rosemont Road which overlooks the site to the north. Despite repeated requests, none of the drawings in the application demonstrates the impact on their views. There are also significant impacts on views from the Redington/Frognaal, Fitzjohns/Netherhall and South Hampstead Conservation Areas. Historic England, in their response (2 March 2022) note that “The buildings on the site are substantially greater than that found within the conservation areas and would appear in some views from within them and out of them. The volume and scale of the development means that there is a harmful impact to designated heritage assets through development within their setting.”

19. Finally, the height and density of the proposals is exacerbated by the choice of a grey/beige colour palette. The developers have said that the design is informed by St John’s Court (the building atop Waitrose, Finchley Road) but this block itself is an exception to the predominant red brick of most of the buildings on both the Finchley Road and West End Lane sides of the site. Policy 2 of the Fortune Green and West Hampstead Neighbourhood Plan requires “a presumption in favour of a colour palette which reflects, or is in harmony with, the materials of its context.”

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Key concerns: The plans do not meet Camden Council's net-zero carbon targets.

20. A large, surface level car park is not a climate-friendly use of the land and redeveloping this site offers the opportunity for a development that leads the way in sustainability. It is therefore disappointing that Landsec's proposals do not meet today's requirements of the London Plan or Camden Council for net-zero carbon development, let alone what might be the standards when the development is completed in 15 years' time.

The Planning Statement (para 14.51) states "Overall, it is anticipated that the Proposed Development would achieve in the region of a 66.3% reduction for the Detailed Proposals and 53% reduction for the Outline Proposals in CO2 emissions beyond the baseline, with the zero-carbon target shortfall to be offset through carbon offset payments." In other words, Landsec are seeking to pay Camden Council a sum estimated to be in the region of £828,345 to offset their failure to meet the Council's requirements. The plans fall far short of Camden's vision to be a leading borough in tackling climate change.

21. Further, London Plan Policy SI2 requires developments referable to the Mayor to "demonstrate actions taken to reduce life-cycle carbon emissions". The Planning Statement (paras 14.41 – 14.47) considers the issue of embodied carbon suggests that demolition of the O2 Shopping Centre and replacement with more modern, low-energy buildings, would result in a comparable "whole life carbon" emission. It suggests that a stretch target of achieving lower whole life carbon emissions would only be achieved if "100% of the substructure, approximately 60% of the superstructure and approximately 90% of the façade embodied carbon ...[was]... retained. In other words, the plans do not achieve the London Plan policy requirements unless some rather heroic assumptions are made about the demolition process.

22. There have been serious flooding issues in this area in recent years, and the plans have not sufficiently addressed this issue. Thames Water has expressed serious concerns. In its response (14 March 2022) it states "Following initial investigations, Thames Water has identified an inability of the existing SURFACE WATER network infrastructure to accommodate the needs of this development proposal." They have said that the proposed run-off rate is "far too high", risking serious flooding of the London Underground lines and properties in South Hampstead ward (See also comments from South Hampstead Flood Action Group). It is not clear from any subsequent documents that this issue has been addressed.

Key concerns: A range of traffic and transport issues have not been adequately addressed.

23. There are a number of concerns about the way that traffic will use the site. The transport, servicing and waste plans do not reflect today's road and pavement usage, let alone anticipate changes over the coming 15 years. Concerns are listed below:

a. It is proposed that buses, refuse trucks and delivery vehicles will enter the site from Finchley Road, and use the part of Blackburn Road which currently runs from Finchley Road to the car showrooms in order to cross the site. Deliveries and refuse collection will use kerbside loading (Paragraph 15.102 of the Planning Statement). This route is also the main through-route for cyclists, who will share the space with vehicles, running considerable risks as these big vehicles pull in and out of the delivery bays.

b. No provision has been made for space for motorcycle delivery drivers at any point on the development. Yet a cursory look at residential streets or developments will show that there are motorcycle delivery drivers (Uber Eats, Deliveroo etc) on every street every evening, and outside every restaurant or café, waiting to pick up jobs. Unless space is designed in from the start, the pavements and open spaces will be constantly used by motorbikes, putting pedestrians at risk, and noise from the bikes will disturb the local residents.

c. No provision has been made for a rest area for bus drivers – they will be expected to use cafes or shops to get a drink, or go to the toilet. There are obvious risks here which could easily have been mitigated.

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24. The plans include a lot of words about improving access to the site from Finchley Road, but this is not backed up by the detail. For example, Paragraph 15.97 of the Planning Statement notes that there will be no new pedestrian crossing over Finchley Road, cutting off this development from residents in Belsize and Frognal. Para 11.28 of the Planning Statement indicates that to service the new "Town Square" there will be a new servicing yard, accessing loading bays from a new entrance from Finchley Road – crossing the pedestrian route up Finchley Road from the tube station.

I urge Camden to work with Landsec and TfL now to look at the way S106 monies can be sensibly used to take the opportunity to improve the highway configuration and safety aspects. Some good design will be of considerable value to the communities and the local shops and businesses in the area.

The S106 monies needs to be of an adequate to sum and should also be used to mitigate the misery of development work that is phased over a long period.

Key concerns: re-provision of Sainsbury's and other O2 shopping centre amenities.

25. Residents have been concerned by the loss of a number of well-used amenities in the current shopping centre, especially the Sainsbury's. Although there are plans for a replacement Sainsbury's, it will be substantially smaller, because of the car-free nature of the development. Landsec say that this accords with retail trends, with fewer people undertaking a "weekly shop" in a car. However, no detail is provided about any "blue badge" parking for those with disabilities to access the new Sainsbury's or other retail stores (because it is part of Phase 3). As a result, concerns have been raised that those who need to drive (such as those with disabilities or shopping with young children) will have to drive further, leading to an increase in car traffic. This should be explored by the Planning Committee.

26. Residents have also expressed concern about the impact of the proposals on other shops on Finchley Road. In pre-application discussions with the developers, David Fowler of Camden's planning department wrote (para 4.8) "Under the proposals there would be a significant loss of commercial uses and an even greater loss of Class E uses and we have significant concerns about the impact on the vitality and viability of the Finchley Road Town Centre." It is not clear that these concerns have been addressed.

Key concerns: construction framework and management

27. The plans envisage the development happening over three phases, preceded by an initial phase demolishing the Homebase store. The expected length of the construction is 10 – 15 years (para 5.62 of the Planning Statement). Phase 1 will comprise the centre of the site (Homebase and car park, Phase 2 the western section (subject to purchase of the car showroom and Builder Depot site), and Phase 3, the eastern section (involving demolition of the O2 Shopping Centre), which is not expected to start for another 5 – 7 years.

28. There are two important implications of this:

a. The residents of Phase 1 will not benefit from any of the amenities (community green, MUGA, health centre, retail offer in the Town Square) for several years while Phases 2 and 3 are under construction.

b. There will be at least 15 years of construction noise and traffic experienced by local residents on all sides, and possibly 10 years of construction experienced by the residents of the Phase 1 development. There is limited detail on the construction management approach at this stage, but Para 16.26 states "In the worst instances, construction noise would create a temporary, short-term, major negative effect that is significant."

29. My experience as a councillor is that Camden Council's Construction Management Team does not have the capacity to enforce adherence to Construction Management Plans (CMPs) for routine building works, and it falls to residents to contact constructors, developers and the Council to highlight CMP breaches. I am therefore concerned about the impact of 15 years of construction on residents living near to the site or on access routes.

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2022/0528/P	Mary Ryan	20/03/2023 21:33:16	COMMENT	<p>30. Camden Council's approach to construction management is significantly worse than neighbouring authorities which use a "Code of Considerate Practice". This secures funds from the developers to fund a higher number of Construction Management Officers, who make much more frequent announced and unannounced visits to major construction sites to ensure compliance. If Camden are not willing to change their approach, then residents around the site, and those of the first phase of the development, face 10-15 years of noise, dust and traffic chaos</p> <hr/> <p>I object to the 02 Centre planning application for the following reasons: The height and density of the buildings will be oppressive and undesirable for residents. The lack of green space and communal facilities will be to the detriment of residents. Only 35% of the units are planned as affordable and the Camden Plan says 50% of units should be affordable. Only a percentage of the affordable housing is planned to be at social rent levels. This does not meet the great social housing need in Camden. There will be serious environmental problems associated with demolishing the current 02 Centre; dust, traffic, noise . West Hampstead will be seriously disturbed by these factors. There are no plans to improve access to West Hampstead Tube Station Which will become dangerous with th increased population envisaged by the 02 plan.</p>

Application No: 2022/0528/P
Consultees Name: Cllr Nancy Jirira
Received: 20/03/2023 18:31:42
Comment: COMM

Response:
 Objection from Cllr Nancy Jirira (Fortune Green) to
 Planning Reference 2022/0528/P Redevelopment of the O2 Centre Site

Summary

1. This is my objection to the application from Landsec to redevelop the O2 Shopping Centre and car park site. I am disappointed that, despite extensive consultation, Landsec has ignored residents' hopes for a mixed and vibrant community, and suggestions to mitigate the risk of increased congestion. A large surface level car park between two Zone 2 tube stations is not a good use of space, but Landsec's plans repeatedly breach Camden Council's planning policies and should be rejected.

2. On behalf of local residents, I have consistently called for the proposals to:

- a. Offer the once-in-a-generation upgrade to West Hampstead tube station, including a lift, that is needed to accommodate the new residents on the site, in the light of significant existing congestion at the station;
- b. Meet Camden Council's target of 50% affordable housing, to deliver a mixed community; and
- c. Include new amenities, including much-needed green open spaces, places for children and young people to play, and a new state-of-the-art health centre.

3. I am fully in support of the Fortune Green & West Hampstead Neighbourhood Plan, which earmarks the land between West End Lane and Finchley Road for redevelopment. Unlike the local Conservatives, I agree that a large car park is not a good use of the site. There is a severe housing shortage in the borough, and I support new housing on this site, as envisaged in the Neighbourhood Plan. It is well connected to public transport, and I support a car-free development, mixing housing, employment, leisure, retail and community uses.

4. As a local councillor, I have engaged actively with Landsec's consultations over the past two years and encouraged residents to share their views. It is therefore deeply disappointing that there have been no meaningful changes to the plans submitted for approval. On the points listed in para 2:

- a. There is no clarity on the timing or level of any funding for a lift at West Hampstead tube station, and no indication that there are active discussions with Camden Council and Transport for London to take this issue forward;
- b. The proposal for only 35% affordable housing (and only 60% of that housing for social rent) means that, out of nearly 1,800 homes, only 315 will be social housing to address the needs of the 7,000 households on Camden's housing waiting list;
- c. The proposed open space amounts to only one-third of Camden's policy requirement – only 13,308 sqm compared to the policy requirement of 33,261sqm. The developer has offered the Council a financial payment to mitigate the shortfall – but this money doesn't have to be spent in the local area, which is already classed as deficient in open space.

5. I urge Camden Council to reject this application, and work with Landsec to develop a plan that listens and responds to residents' concerns.

Key Concerns: The plans don't address overcrowding in and around West Hampstead Tube Station, and the lack of a lift.

6. The plans propose 1,800 new flats, bringing an estimated 3,000 – 4,000 new residents to the area. The development is car-free, and so most of them will use local train and tube stations. The nearest stations -

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West Hampstead tube station, Finchley Road tube station, and Finchley Road & Frognal overground - are inaccessible to people with disabilities, mobility issues, prams, or heavy luggage. For West Hampstead tube station, now a major interchange with the Thameslink and Overground stations, the redevelopment of the site offered a once-in-a-generation opportunity to address this issue, which looks likely to be missed. While the Planning Statement refers to safeguarding land for new access routes to these stations, and making a financial contribution, there is no detail provided, and no assurances given.

7. Arup's transport assessment shows that both Finchley Road and West Hampstead stations will be overstretched by 2031 – West Hampstead in terms of gate capacity, and Finchley Road (where many passengers switch from the Metropolitan line to the Jubilee line) in terms of platform capacity. In terms of train capacity, it is not clear that the assessment takes account of the significant additional development being planned further north, for example at Wembley Park.

8. Further, the analysis of capacity uses TfL's standard methodology which averages passengers out across the hour. This does not reflect the way West Hampstead tube station is used – with passengers "bunching" as Thameslink trains arrive, leading to dangerous levels of congestion on the streets around the station, around the gate area and on the steps, interspersed by quieter periods. This issue has to be addressed before the development can be approved.

Key Concerns: The proposed housing mix does not meet Camden Council's policy.

9. The Affordable Housing Statement sets out that 35% of the development will be "affordable", assessed as a proportion of the floorspace. (It is worth noting that, if the number of units is used as the calculation, it is only 31% affordable.) Only 60% of the affordable housing will be for low-cost rent, available to the 7,000 households on Camden's housing list, the remainder being "intermediate" rent. Thus in a development of nearly 1,800 homes, only 315 will be what people generally understand to be "council housing".

10. Paragraph 3.83(e) of the Local Plan (Policy H4) states that "an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings". It is therefore clear that the proposed development does not meet Camden Council's policy. The developers have repeatedly been told of Camden Council's concern about this – for example in September 2021, as part of the pre-application discussions, David Fowler from Camden's planning department wrote to the developer about the prospect of the council using its powers to compulsory-purchase some of the site, saying "We have discussed the Council using its compulsory purchase powers to ensure the site comes forward comprehensively. Comprehensive redevelopment is a fundamental requirement of the Council on this site, however, for the Council to use its compulsory purchase powers there needs to be significant public benefits. This would be difficult to argue with a poor affordable offer."

11. Over 50% of the market homes will be studios/ 1-bedroom flats, between 20% and 50% 2-bedroom flats, and, in the detailed application, only 4% 3-bedroom properties. This will deliver more small units, rather than the 3 and 4-bedroom homes this area needs to sustain a genuinely mixed community, and required by Policy 1 of the Fortune Green and West Hampstead Neighbourhood Plan.

12. Paragraph 18.20 of the Planning Statement indicates that the development will be "Build to Rent". All the homes in the detailed planning application are for rent. This will mean that the development will be a transient population, with people living here for a short time, without a stake in the local area, before leaving to settle somewhere else.

13. While I recognise the difficulty that Camden Council faces in meeting the constraints of the Government's Housing Delivery Test, the impact of the "Build to Rent" approach, and the predominance of small units, will mean that this community will not be diverse and connected, but rather transient and isolated. It will not achieve the "We Make Camden" vision of being a place where people "start well, live well, and age well".

Key concerns: The plans don't deliver the required green open space, even considering plans for land

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Landsec doesn't own.

14. Camden is the 5th most dense borough in London. People in Camden can enjoy 16 square metres of green space per person, compared to 19 in London and 214 across England. In the light of these stark statistics, the redevelopment of the O2 Shopping Centre and car park site could have been an opportunity to create a lively, green, heart for a new community.

15. Instead, the plans comprise a new community green of 0.35hectares (less than half the size of Fortune Green, which is 0.8ha), a new central square of 0.17ha (smaller than Iverson Road open space, which is 0.2ha), Billy Fury Yard (also 0.17 ha) and a linear park of 0.65ha. It is difficult to find out how wide this is proposed to be, but in September 2021, David Fowler from Camden Council's planning department wrote to the developer as part of the pre-application process stating "The proposed linear park would have a width of 19-23m. We have raised concerns over whether this route would feel like a park or just a route. Under the proposals, the 20m wide linear park would need to work very hard, providing an east/west thoroughfare, place for tables and chairs for the ground floor uses, dwelling space and also play space. It needs to be demonstrated that all these functions can be accommodated within this width. Any opportunities should be taken to increase its width."

16. The plans fall far short of Camden's standard for open space which is 9sqm per occupier. Indeed, the application accepts that "the proposed development is unable to meet the full policy requirements in respect to open space" (para 10.42 of the Planning Statement.) It states that to meet the policy it would need to provide 33,261 sqm of open space, whereas the proposals overall only include 13,308sqm – less than half of what is needed. The developer has offered the Council a financial payment to mitigate this – but this money doesn't have to spent in the local area, which is already classed as deficient in open space.

17. Further, the proposed community green (the largest and greenest space in the development, with space for children's play as well as a Multi-Use Games Area (MUGA)), is in the second phase of the site (towards West End Lane), which is on land that Landsec do not own (currently car showrooms). A significant number of the other amenities, including the space earmarked for a health centre, and a creche, is on this land. There is a significant risk that, if planning approval is given for the detailed application, and Landsec are unsuccessful in purchasing the car showroom land, the community green and health centre will never happen.

Key concerns: The height and density of the development is not in line with London Plan Policy.

18. The height and density of the development has been a major concern for residents, as it is out of keeping with buildings in the local area. Most of the immediate area is 5-6 storeys, with some buildings (such as one of the West Hampstead Square / Heritage Lane blocks) rising to 12 storeys. Landsec's development proposes 6 buildings of up to 16 storeys, and 14 buildings of up to 12s storeys. This does not fit with Policy 2 of the Fortune Green and West Hampstead Neighbourhood Plan which states that development should be "human in scale, in order to maintain and create a positive relationship between buildings and street level activity." Some residents have suggested that by building higher, greater revenue can be generated to fund benefits such as a higher proportion of affordable housing, or green space. This application, however, fails to meet the Council's policy in regard to either affordable housing or open space, despite proposing greater height and density than other buildings in the local area.

19. The proposals have been criticised by the Greater London Assembly , who state (Paragraph 86) "The proposals are not considered to be in accordance with London Plan Policy D9 (Part B). There are some concerns that the scale and massing of the Detailed Phase and the Outline Phase 3 results in some areas of non-compliance with London Plan Policy D9 (Part C), including harm to the significance of heritage assets and

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townscape, which require further consideration.”

20. The height will have a major impact on those living near to the site, especially the residents of Rosemont Road which overlooks the site to the north. Despite repeated requests, none of the drawings in the application demonstrates the impact on their views. There are also significant impacts on views from further away, including the South Hampstead, Redington/Frognaal and Fitzjohns/Netherhall Conservation Areas. Historic England, in their response (2 March 2022) note that “The buildings on the site are substantially greater than that found within the conservation areas and would appear in some views from within them and out of them. The volume and scale of the development means that there is a harmful impact to designated heritage assets through development within their setting.”

21. Finally, the height and density of the proposals is exacerbated by the choice of a grey/beige colour palette. Policy 2 of the Fortune Green and West Hampstead Neighbourhood Plan requires “a presumption in favour of a colour palette which reflects, or is in harmony with, the materials of its context.” The developers have said that the design is informed by St John’s Court (the building atop Waitrose, Finchley Road) but this block itself is an exception to the predominant red brick of most of the buildings on both the Finchley Road and West End Lane sides of the site.

Key concerns: The plans do not meet Camden Council’s net-zero carbon targets.

22. A large, surface-level car park is not a climate-friendly use of the land, and the existing O2 Shopping Centre is not an efficient use of the space. Redeveloping this site offers the opportunity for a development that leads the way in sustainability. It is therefore disappointing that Landsec’s proposals do not meet today’s requirements of the London Plan or Camden Council for net-zero carbon development, let alone what might be the standards when the development is completed in 15 years’ time. The Planning Statement (para 14.51) states “Overall, it is anticipated that the Proposed Development would achieve in the region of a 66.3% reduction for the Detailed Proposals and 53% reduction for the Outline Proposals in CO² emissions beyond the baseline, with the zero-carbon target shortfall to be offset through carbon offset payments.” In other words, Landsec are seeking to pay Camden Council a sum estimated to be in the region of £828,345 to offset their failure to meet the Council’s requirements. The plans fall far short of Camden’s vision to be a leading borough in tackling climate change.

23. Further, London Plan Policy SI2 requires developments referable to the Mayor to “demonstrate actions taken to reduce life-cycle carbon emissions”. The Planning Statement (paras 14.41 – 14.47) considers the issue of embodied carbon and suggests that demolition of the O2 Shopping Centre and replacement with more modern, low-energy buildings, would result in a comparable “whole life carbon” emission. It suggests that a stretch target of achieving lower whole life carbon emissions would only be achieved if “100% of the substructure, approximately 60% of the superstructure and approximately 90% of the façade embodied carbon[was].... retained. In other words, the plans do not achieve the London Plan policy requirements unless some rather heroic assumptions are made about the demolition process.

24. There have been serious flooding issues in this area in recent years, and the plans have not sufficiently addressed this issue. Thames Water has expressed serious concerns. In its response (14 March 2022) it states “Following initial investigations, Thames Water has identified an inability of the existing SURFACE WATER network infrastructure to accommodate the needs of this development proposal.” They have said that the proposed run-off rate is “far too high”, risking serious flooding of the London Underground lines and properties in South Hampstead ward (See also comments from South Hampstead Flood Action Group). It is not clear from any subsequent documents that this issue has been addressed.

Key concerns: A range of traffic and transport issues have not been adequately addressed.

25. There are a number of concerns about the way that traffic will use the site. The transport, servicing and waste plans do not reflect today’s road and pavement usage, let alone anticipate changes over the coming 15

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years. Concerns are listed below:

a. It is proposed that buses, refuse trucks and delivery vehicles will enter the site from Finchley Road, and use the part of Blackburn Road which currently runs from Finchley Road to the car showrooms in order to cross the site. Deliveries and refuse collection will use kerbside loading (Paragraph 15.102 of the Planning Statement). This route is also the main through-route for cyclists, who will share the space with vehicles, running considerable risks as these big vehicles pull in and out of the delivery bays.

b. No provision has been made for space for motorcycle delivery drivers at any point on the development. Yet a cursory look at residential streets or developments will show that there are motorcycle delivery drivers (Uber Eats, Deliveroo etc) on every street every evening, and outside every restaurant or café, waiting to pick up jobs. Unless space is designed in from the start, the pavements and open spaces will be constantly used by motorbikes, putting pedestrians at risk, and noise from the bikes will disturb the local residents.

c. No provision has been made for a rest area for bus drivers – they will be expected to use cafes or shops to get a drink, or go to the toilet. There are obvious risks here which could easily have been mitigated.

26. The plans include a lot of words about improving access to the site from Finchley Road, but this is not backed up by the detail. For example, Paragraph 15.97 of the Planning Statement notes that there will be no new pedestrian crossing over Finchley Road, cutting off this development from residents in Belsize and Frognal. Para 11.28 of the Planning Statement indicates that to service the new “Town Square” there will be a new servicing yard, accessing loading bays from a new entrance from Finchley Road – crossing the pedestrian route up Finchley Road from the tube station.

Key concerns: reprovision of Sainsbury’s and other O2 shopping centre amenities.

27. Residents have been concerned by the loss of a number of well-used amenities in the current shopping centre, especially the Sainsbury’s. Although there are plans for a replacement Sainsbury’s, it will be substantially smaller, because of the car-free nature of the development. Landsec say that this accords with retail trends, with fewer people undertaking a “weekly shop” in a car. However no detail is provided about any “blue badge” parking for those with disabilities to access the new Sainsbury’s or other retail stores (because it is part of Phase 3). As a result, concerns have been raised that those who need to drive (such as those with disabilities or shopping with young children) will have to drive further, leading to an increase in car traffic. This should be explored by the Planning Committee.

28. Residents have also expressed concern about the impact of the proposals on other shops on Finchley Road. In pre-application discussions with the developers, David Fowler of Camden’s planning department wrote (para 4.8) “Under the proposals there would be a significant loss of commercial uses and an even greater loss of Class E uses and we have significant concerns about the impact on the vitality and viability of the Finchley Road Town Centre.” It is not clear that these concerns have been addressed.

Key concerns: construction timeframe and management

29. The plans envisage the development happening over three phases, preceded by an initial phase demolishing the Homebase store. The expected length of the construction is 10 – 15 years (para 5.62 of the Planning Statement). Phase 1 will comprise the centre of the site (Homebase and car park, Phase 2 the western section (subject to purchase of the car showroom and Builder Depot site), and Phase 3, the eastern section (involving demolition of the O2 Shopping Centre), which is not expected to start for another 5 – 7 years.

30. There are two important implications of this:

a. The residents of Phase 1 will not benefit from any of the amenities (community green, MUGA, health centre, retail offer in the Town Square) for several years while Phases 2 and 3 are under construction.

b. There will be at least 15 years of construction noise and traffic experienced by local residents on all sides,

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and possibly 10 years of construction experienced by the residents of the Phase 1 development. There is limited detail on the construction management approach at this stage, but Para 16.26 states "In the worst instances, construction noise would create a temporary, short-term, major negative effect that is significant."

31. NW6 residents have recent experience of construction sites at Liddell Road (off Maygrove Road) and 156 West End Lane, and they have been extremely disruptive for residents both near to the site and further away. Key concerns have been:

- a. Repeated breaches of working hours (starting early, finishing late)
- b. Repeated breaches of agreed construction traffic routes, resulting in delivery lorries, cement mixers and other construction traffic using residential roads, or parking illegally outside the site
- c. Repeated breaches of noise and dust constraints, and non-compliance with the requirements to supply reports on these matters. This was only rectified after a resident raised a complaint with the Considerate Constructors Scheme.
- d. Site lighting being left on over the weekend, shining directly into neighbours' homes
- e. Unauthorised crane manoeuvres, such as lifting concrete from the road while cars are passing, or encroaching over people's gardens.

32. In all the cases listed above, it has been left to residents to contact the constructors and the developers to highlight the CMP breaches, and to alert the Council if there is no response. In essence, it has fallen to residents to enforce the conditions of the Construction Management Plans.

33. Camden Council's approach to construction management is significantly worse than neighbouring authorities which use a "Code of Considerate Practice". This secures funds from the developers to fund a higher number of Construction Management Officers, who make much more frequent announced and unannounced visits to major construction sites to ensure compliance. If Camden are not willing to change their approach, then residents around the site, and those of the first phase of the development, face 10 -15 years of noise, dust, and traffic chaos.

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2022/0528/P	Cllr Nancy Jirira	20/03/2023 18:31:58	COMM	<p>Objection from Cllr Nancy Jirira (Fortune Green) to Planning Reference 2022/0528/P Redevelopment of the O2 Centre Site</p> <p>Summary</p> <ol style="list-style-type: none"> 1. This is my objection to the application from Landsec to redevelop the O2 Shopping Centre and car park site. I am disappointed that, despite extensive consultation, Landsec has ignored residents' hopes for a mixed and vibrant community, and suggestions to mitigate the risk of increased congestion. A large surface level car park between two Zone 2 tube stations is not a good use of space, but Landsec's plans repeatedly breach Camden Council's planning policies and should be rejected. 2. On behalf of local residents, I have consistently called for the proposals to: <ol style="list-style-type: none"> a. Offer the once-in-a-generation upgrade to West Hampstead tube station, including a lift, that is needed to accommodate the new residents on the site, in the light of significant existing congestion at the station; b. Meet Camden Council's target of 50% affordable housing, to deliver a mixed community; and c. Include new amenities, including much-needed green open spaces, places for children and young people to play, and a new state-of-the-art health centre. 3. I am fully in support of the Fortune Green & West Hampstead Neighbourhood Plan, which earmarks the land between West End Lane and Finchley Road for redevelopment. Unlike the local Conservatives, I agree that a large car park is not a good use of the site. There is a severe housing shortage in the borough, and I support new housing on this site, as envisaged in the Neighbourhood Plan. It is well connected to public transport, and I support a car-free development, mixing housing, employment, leisure, retail and community uses. 4. As a local councillor, I have engaged actively with Landsec's consultations over the past two years and encouraged residents to share their views. It is therefore deeply disappointing that there have been no meaningful changes to the plans submitted for approval. On the points listed in para 2: <ol style="list-style-type: none"> a. There is no clarity on the timing or level of any funding for a lift at West Hampstead tube station, and no indication that there are active discussions with Camden Council and Transport for London to take this issue forward; b. The proposal for only 35% affordable housing (and only 60% of that housing for social rent) means that, out of nearly 1,800 homes, only 315 will be social housing to address the needs of the 7,000 households on Camden's housing waiting list; c. The proposed open space amounts to only one-third of Camden's policy requirement – only 13,308 sqm compared to the policy requirement of 33,261sqm. The developer has offered the Council a financial payment to mitigate the shortfall – but this money doesn't have to be spent in the local area, which is already classed as deficient in open space. 5. I urge Camden Council to reject this application, and work with Landsec to develop a plan that listens and responds to residents' concerns. Key Concerns: The plans don't address overcrowding in and around West Hampstead Tube Station, and the lack of a lift. 6. The plans propose 1,800 new flats, bringing an estimated 3,000 – 4,000 new residents to the area. The development is car-free, and so most of them will use local train and tube stations. The nearest stations -

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West Hampstead tube station, Finchley Road tube station, and Finchley Road & Frognal overground - are inaccessible to people with disabilities, mobility issues, prams, or heavy luggage. For West Hampstead tube station, now a major interchange with the Thameslink and Overground stations, the redevelopment of the site offered a once-in-a-generation opportunity to address this issue, which looks likely to be missed. While the Planning Statement refers to safeguarding land for new access routes to these stations, and making a financial contribution, there is no detail provided, and no assurances given.

7. Arup's transport assessment shows that both Finchley Road and West Hampstead stations will be overstretched by 2031 – West Hampstead in terms of gate capacity, and Finchley Road (where many passengers switch from the Metropolitan line to the Jubilee line) in terms of platform capacity. In terms of train capacity, it is not clear that the assessment takes account of the significant additional development being planned further north, for example at Wembley Park.

8. Further, the analysis of capacity uses TfL's standard methodology which averages passengers out across the hour. This does not reflect the way West Hampstead tube station is used – with passengers "bunching" as Thameslink trains arrive, leading to dangerous levels of congestion on the streets around the station, around the gate area and on the steps, interspersed by quieter periods. This issue has to be addressed before the development can be approved.

Key Concerns: The proposed housing mix does not meet Camden Council's policy.

9. The Affordable Housing Statement sets out that 35% of the development will be "affordable", assessed as a proportion of the floorspace. (It is worth noting that, if the number of units is used as the calculation, it is only 31% affordable.) Only 60% of the affordable housing will be for low-cost rent, available to the 7,000 households on Camden's housing list, the remainder being "intermediate" rent. Thus in a development of nearly 1,800 homes, only 315 will be what people generally understand to be "council housing".

10. Paragraph 3.83(e) of the Local Plan (Policy H4) states that "an affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings". It is therefore clear that the proposed development does not meet Camden Council's policy. The developers have repeatedly been told of Camden Council's concern about this – for example in September 2021, as part of the pre-application discussions, David Fowler from Camden's planning department wrote to the developer about the prospect of the council using its powers to compulsory-purchase some of the site, saying "We have discussed the Council using its compulsory purchase powers to ensure the site comes forward comprehensively. Comprehensive redevelopment is a fundamental requirement of the Council on this site, however, for the Council to use its compulsory purchase powers there needs to be significant public benefits. This would be difficult to argue with a poor affordable offer."

11. Over 50% of the market homes will be studios/ 1-bedroom flats, between 20% and 50% 2-bedroom flats, and, in the detailed application, only 4% 3-bedroom properties. This will deliver more small units, rather than the 3 and 4-bedroom homes this area needs to sustain a genuinely mixed community, and required by Policy 1 of the Fortune Green and West Hampstead Neighbourhood Plan.

12. Paragraph 18.20 of the Planning Statement indicates that the development will be "Build to Rent". All the homes in the detailed planning application are for rent. This will mean that the development will be a transient population, with people living here for a short time, without a stake in the local area, before leaving to settle somewhere else.

13. While I recognise the difficulty that Camden Council faces in meeting the constraints of the Government's Housing Delivery Test, the impact of the "Build to Rent" approach, and the predominance of small units, will mean that this community will not be diverse and connected, but rather transient and isolated. It will not achieve the "We Make Camden" vision of being a place where people "start well, live well, and age well".

Key concerns: The plans don't deliver the required green open space, even considering plans for land

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Landsec doesn't own.

14. Camden is the 5th most dense borough in London. People in Camden can enjoy 16 square metres of green space per person, compared to 19 in London and 214 across England. In the light of these stark statistics, the redevelopment of the O2 Shopping Centre and car park site could have been an opportunity to create a lively, green, heart for a new community.

15. Instead, the plans comprise a new community green of 0.35hectares (less than half the size of Fortune Green, which is 0.8ha), a new central square of 0.17ha (smaller than Iverson Road open space, which is 0.2ha), Billy Fury Yard (also 0.17 ha) and a linear park of 0.65ha. It is difficult to find out how wide this is proposed to be, but in September 2021, David Fowler from Camden Council's planning department wrote to the developer as part of the pre-application process stating "The proposed linear park would have a width of 19-23m. We have raised concerns over whether this route would feel like a park or just a route. Under the proposals, the 20m wide linear park would need to work very hard, providing an east/west thoroughfare, place for tables and chairs for the ground floor uses, dwelling space and also play space. It needs to be demonstrated that all these functions can be accommodated within this width. Any opportunities should be taken to increase its width."

16. The plans fall far short of Camden's standard for open space which is 9sqm per occupier. Indeed, the application accepts that "the proposed development is unable to meet the full policy requirements in respect to open space" (para 10.42 of the Planning Statement.) It states that to meet the policy it would need to provide 33,261 sqm of open space, whereas the proposals overall only include 13,308sqm – less than half of what is needed. The developer has offered the Council a financial payment to mitigate this – but this money doesn't have to spent in the local area, which is already classed as deficient in open space.

17. Further, the proposed community green (the largest and greenest space in the development, with space for children's play as well as a Multi-Use Games Area (MUGA)), is in the second phase of the site (towards West End Lane), which is on land that Landsec do not own (currently car showrooms). A significant number of the other amenities, including the space earmarked for a health centre, and a creche, is on this land. There is a significant risk that, if planning approval is given for the detailed application, and Landsec are unsuccessful in purchasing the car showroom land, the community green and health centre will never happen.

Key concerns: The height and density of the development is not in line with London Plan Policy.

18. The height and density of the development has been a major concern for residents, as it is out of keeping with buildings in the local area. Most of the immediate area is 5-6 storeys, with some buildings (such as one of the West Hampstead Square / Heritage Lane blocks) rising to 12 storeys. Landsec's development proposes 6 buildings of up to 16 storeys, and 14 buildings of up to 12s storeys. This does not fit with Policy 2 of the Fortune Green and West Hampstead Neighbourhood Plan which states that development should be "human in scale, in order to maintain and create a positive relationship between buildings and street level activity." Some residents have suggested that by building higher, greater revenue can be generated to fund benefits such as a higher proportion of affordable housing, or green space. This application, however, fails to meet the Council's policy in regard to either affordable housing or open space, despite proposing greater height and density than other buildings in the local area.

19. The proposals have been criticised by the Greater London Assembly , who state (Paragraph 86) "The proposals are not considered to be in accordance with London Plan Policy D9 (Part B). There are some concerns that the scale and massing of the Detailed Phase and the Outline Phase 3 results in some areas of non-compliance with London Plan Policy D9 (Part C), including harm to the significance of heritage assets and

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townscape, which require further consideration.”

20. The height will have a major impact on those living near to the site, especially the residents of Rosemont Road which overlooks the site to the north. Despite repeated requests, none of the drawings in the application demonstrates the impact on their views. There are also significant impacts on views from further away, including the South Hampstead, Redington/Frognaal and Fitzjohns/Netherhall Conservation Areas. Historic England, in their response (2 March 2022) note that “The buildings on the site are substantially greater than that found within the conservation areas and would appear in some views from within them and out of them. The volume and scale of the development means that there is a harmful impact to designated heritage assets through development within their setting.”

21. Finally, the height and density of the proposals is exacerbated by the choice of a grey/beige colour palette. Policy 2 of the Fortune Green and West Hampstead Neighbourhood Plan requires “a presumption in favour of a colour palette which reflects, or is in harmony with, the materials of its context.” The developers have said that the design is informed by St John’s Court (the building atop Waitrose, Finchley Road) but this block itself is an exception to the predominant red brick of most of the buildings on both the Finchley Road and West End Lane sides of the site.

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2022/0528/P	MARIA PEAKIN	20/03/2023 10:17:57	OBJ	<p>I wish to raise the strongest objections to this terrible plan and its detrimental affects on the local area. I object on the following grounds:</p> <ol style="list-style-type: none"> Overbearing height: There are 11 tower blocks of 12-15 storeys, 10 blocks of 8-11 stories, and three buildings of 3-6 stories. The Greater London Authority says tall buildings are not the answer to our housing needs Crammed layout and extreme density: The site, at 315 dwellings per hectare, is officially superdensity and almost hyperdensity (350 homes per hectare) Huge negative impact on local infrastructure - GP surgeries, schools, utilities, dangerously overcrowded pavements and public transport Water, sewage and flooding dangers in an area already affected by regular flooding Insufficient usable green space. The open space is HALF of that outlined by Camden's Local Plan and approximately 12% The impact on the surrounding conservation areas - The Greater London Authority says councils must require that developments respect local context and character. which this scheme clearly fails to do The plan conflicts with Camdens Climate Change and Clean Air Action Plan. Overshadowing and loss of light to neighbouring homes. The right to light of nearby neighbours to the north is protected by the Rights to Light Act 1959
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Application No:	Consultees Name:	Received:	Comment:	Response:
2022/0528/P	Zorika Adams	20/03/2023 18:10:02	OBJ	<p>As a local resident of West Hampstead, I object to the planned development of The O2 Centre on the following grounds:</p> <p>Overbearing height of the tower blocks, crammed layout and extreme density of dwellings. With 315 dwellings per hectare this is officially superdensity and almost hyperdensity (350 per hectare) which ignores planning rules from The National Model Design Code (3-5 times denser), The Fortune Green and West Hampstead Neighborhood Plan, The National Planning Policy Framework, the 2016 London Plan SRQ (2x denser) and London Plan policy D9 and an independent planning consultant hire by community groups found Landsec plan fails ALL requirements of Camden Local plan, bar one.</p> <p>The scheme will swamp local infrastructure, utilities and community assets. Increase burden on already inadequate rubbish collection, GP surgeries, police and school facilities.</p> <p>West End Lane and Finchley Road will face dangerously overcrowded pavements and roads with the additional 5000 new residents in the area. Deliveries to 5000 new people will cause massive congestion and additional delivery vehicles/ journeys being made in the local area.</p> <p>Public transport will be overwhelmed. During rush hour, pavements and platforms are already overcrowded, especially at the entrance of West Hampstead Tube Station</p> <p>Insufficient public green space - the park is more of a narrow corridor rather than open space and much of the space between buildings is paved which will further contribute to risk of water run off rather than soil to absorb rain water.</p> <p>Tower blocks provide oppressive, lightless and airless living conditions. Many flats will get no direct light at all and one third of the flats do not meet standards for daylight/sunlight. This will not only prove to be unpleasant to live in but will result in higher energy consumption to light and heat the flats due to lack of daylight and sunlight</p> <p>Increased crime risk due to narrow pathways, dark and poorly overlooked spaces. Tower block environments can be conducive to poor behaviour.</p> <p>Surrounding conservation sites will be negatively impacted by the intrusion of the tower blocks. The tower blocks will overshadow existing homes in the area and loss of light to neighbouring homes</p> <p>87% of the flats will be 1 and 2 beds which are not sufficient for families which Camden claim are in need of accommodation. Many of these flats will be bought by investors and rented out, often to a transient population moving into the area.</p> <p>Huge increase in noise and construction traffic for several years in the whole of the surround areas of West Hampstead, South Hampstead and Finchley Road during the construction phase. This is currently the case with the development on West End Lane, opposite Thameslink, with lorries constantly entering and leaving the development not only causing congestion but also posing a danger to cyclists and pedestrians and other road users.</p>

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				Loss of amenities at O2 Centre, especially the large Sainsburys, Gym and Cinema which are all valuable to the local community
2022/0528/P	Dorothy Holt	20/03/2023 12:34:21	APP	<p>Little thought has been given to environmental issues.</p> <p>Space, green area, Play , Rest and relaxation. The area becomes a concrete jungle.. West Hampstead, congested already, will hardly be negotiable. Fortune Green road and Abbey Road, are narrow roads with traffic often at a standstill.</p> <p>Reduce the height of the blocks. Add a cinema, an area for craft and creativity and play.</p>
2022/0528/P	Dr Susan Paisner	20/03/2023 09:24:33	COMMNT	This development is totally unsuitable for this area and is against and contradicts all good practice and planning guidelines particularly reducing green space ,water and power issues, density of population etc and will be a nightmare from traffic access etc Camden is facing many issues but ruining this part of the borough will not help in any way the blocks of flats are totally unsuitable for family dwelling etc please stop this development now as traffic issues are already impossible for residents....
2022/0528/P	Dr Susan Paisner	20/03/2023 09:24:36	COMMNT	This development is totally unsuitable for this area and is against and contradicts all good practice and planning guidelines particularly reducing green space ,water and power issues, density of population etc and will be a nightmare from traffic access etc Camden is facing many issues but ruining this part of the borough will not help in any way the blocks of flats are totally unsuitable for family dwelling etc please stop this development now as traffic issues are already impossible for residents....
2022/0528/P	Dr Susan Paisner	20/03/2023 09:24:39	COMMNT	This development is totally unsuitable for this area and is against and contradicts all good practice and planning guidelines particularly reducing green space ,water and power issues, density of population etc and will be a nightmare from traffic access etc Camden is facing many issues but ruining this part of the borough will not help in any way the blocks of flats are totally unsuitable for family dwelling etc please stop this development now as traffic issues are already impossible for residents....
2022/0528/P	Dr Susan Paisner	20/03/2023 09:24:41	COMMNT	This development is totally unsuitable for this area and is against and contradicts all good practice and planning guidelines particularly reducing green space ,water and power issues, density of population etc and will be a nightmare from traffic access etc Camden is facing many issues but ruining this part of the borough will not help in any way the blocks of flats are totally unsuitable for family dwelling etc please stop this development now as traffic issues are already impossible for residents....

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2022/0528/P	shelley saunders	20/03/2023 11:50:42	OBJ	<p>Too dense a development - the area just doesn't have the infrastructure to cope with so many people. Poorly designed for people living - the real plans do not reflect what Landsec 'say' they will do.</p> <p>We have so much flooding already in the area, we do not need all the extra builds that will only place more pressure on an already failing waste system.</p> <p>The designs will only increase crimes of muggings and worse - as a woman, I would not want to walk through that estate at night - or even during the day, it is patently unsafe. That 'honeypot' will attract more criminals in general to the area, increasing the already increasing crime against individuals.</p> <p>And no to destroying the O2 - why not re-furbish / purpose it?</p> <p>Also, if you look at the environmental considerations in this, it's pure ecocide. Camden was one of the first boroughs to hold a Citizens Assembly around the climate crisis - why not act on it?</p> <p>Not against extra homes, but eco-friendly - re-furbishment, lower impact buildings, more real green space - we need to think longer term - we're facing true calamity with the ongoing ecological biodiversity crisis - we need to consider that for the future generations and stop acting only for the shorter term profit of developers.</p> <p>You can't eat (or breathe) money.</p>
