

**From:** Felicia Epstein  
**Sent:** 19 March 2023 11:57  
**To:** David Fowler  
**Subject:** Application 2022/2958/P

Dear Mr Fowler

I am a resident of a nearby road to the O2 Centre and regularly use the O2 amenities, local tube and overground stations.

I would like to register its objection to this proposal to regenerate the O2 Centre and car park.

I have previously objected but am now objecting to the new plans put forward.

The proposal is in conflict with key Camden policies.

Key harms relate to loss of amenity and community assets, poor design, harm to many heritage assets, insufficient green space, inadequate urban greening, harm to the viability of Finchley Road Town Centre and an increased risk of local flooding. Some of these harms are considered below.

1. Demolition of a community asset that our family use regularly.
2. The design plans are not keeping with the local environment. This is both in size and design features and will cause harm to heritage properties.
3. There is inadequate green spaces allocated to the project contrary to the planning requirements. 9 sq metres per person.

Notwithstanding the involvement of London Wildlife Trust, the proposals are not compliant with the [minimum](#) Urban Greening Score of 0.4 for predominantly residential development, as required by Policy G5 of the London Plan, and the proposals fail to provide the required gains for nature.

#### 4. Failure in the design to address the threat from surface water flooding.

##### A. Surface water flooding in South Hampstead, 11 July 2022

<https://www.dailymail.co.uk/news/article-9779719/Flood-warnings-issued-Met-Office-TWO-INCHES-rain-set-hit-South.html>

Thames Water has expressed concern that the proposals do not meet the requirement for a runoff rate that is close to the greenfield runoff rate. It notes that the [surface water runoff rate of “260 litres per second must be reduced to the greenfield rate of 36 litres per second”](#) and that the existing surface water network is unable “to accommodate the needs of this development proposal.”

Thames Water further adds,

*“Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.”*

##### B. Underground water

Underground water (now culverted) flows from springs on Hampstead Heath to become the River Westbourne and Kilbourne, passing beneath the site and then flowing out into The Thames. Compliance with the National Model Design Code and the London Plan would be improved by seizing the opportunity to separate the clean water from foul water and daylight the underground rivers.

This would have the dual benefits of reducing pressure on sewers and introducing blue infrastructure to the development. Daylighting is being adopted across cities worldwide:

<https://www.timeout.com/climate-action/how-our-cities-lost-rivers-are-being-revived>

As a Lead Local Flood Authority, Camden Council is liable to conform with London Plan Policy SI 13 Sustainable drainage.

## 5. Policies indicating refusal of the application

Although Camden is unable to demonstrate a five-year supply of housing land, paragraph 11(d) of the NPPF indicates that planning permission should not be granted if:

- “(i) the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- (ii) any adverse impacts of doing so significantly and demonstrably outweigh the benefits, when assessed against policies in the Framework taken as a whole.”

The planning application contravenes so many planning policies so as to make it impossible to grant consent.

Policies which the application openly disregards include:

- 
- 
- national policies and guidance:
- - 
  - 
  - 
  - NPPF paras. 128, 129, 133, 134, 174 and 202
  - 
  - 
  - 
  - Planning (Listed Buildings and Conservation Areas) Act 1990, s. 72 (1)
  - 
  - 
  - 
  - The Environment Act
  - 
  - 
  - 
  - the National Model Design Code
  - 
  - 
  - 
  - the National Design Guide
  - 
  -

- 
- current case law, eg APP/Q1445/W/20/3259653 and
- High Court Judgment of 8.4.22 (case no. CO/3041/2021);
- 

- 
- 
- London Plan policies and guidance, including Policies:
- 

- 
- 
- 
- D3, D6, D9 C
- 
- 
- 
- H4
- 
- 
- 
- HC1 C, HC4
- 
- 
- 
- G1, G5, G6 D, G6 E, G7 C
- 
- 
- 
- SI2, SI12 G, SI13 A-D and SI17 B
- 
- 
- 
- London Assembly Guidance note of 14 January 2021;
- 

- 
- 
- Camden Local Plan Policies and Guidance:
- 

-

- 
- 
- A1, A2
- 
- 
- 
- C1
- 
- 
- 
- D1, D2, D3
- 
- 
- 
- G1
- 
- 
- 
- H4, H6, H7
- 
- 
- 
- TC1, TC2, TC4
- 
- 
- 
- WHI2 West End Lane to Finchley Road SPD;
- 

- 
- 
- Camden Constitution;
- 

- 
- the Fortune Green
- and West Hampstead Neighbourhood Plan:
- 
- 
-

- Policies 1, 2,
- 3, 4 and 10
- 

- 
- Conservation Area
- character appraisals and management strategies for five Conservation Areas.
- 

Yours sincerely

Felicia Epstein