

**From:** Raphael Iruzun Martins

**Sent:** 23 March 2023 13:21

**To:** Planning

**Cc:** Tulip Siddiq; Swiss Cottage Councillors; Nina de Ayala Parker (Cllr); Will Prince (Cllr)

**Subject:** Objection to 2022/0528/P (O2 Centre Redevelopment)

Dear Camden Planning Officer,

I am writing to **object** to planning application number 2022/0528/P on numerous grounds including inappropriate development scale, removal of existing leisure and communal assets in the O2 centre which have not been adequately reinstated as well as serious concerns on the quality, environmental impact and safety of the housing being provided in the development which seem to not comply with building regulations, the upcoming building safety changes and the London Housing Design Guide. I am also dismayed how landsec have been allowed to buy a huge number of targeted ads on social media with incorrect facts such as the creation of two new parks and an arbitrary percentage on the land increase, I would suggest these be reviewed by the advertising standards agency. I have summarized many of my objection points below based on the drawings and Design and Access Statement:

Before I start making my objection points, I would like to point out that redeveloping the car park is not a negative thing in itself, the scale of what is being proposed is what is completely over the top and an attempt for Landsec to make up for it's losses in the last years. I am also suprised at the lack of quality of the proposals being put forward by AHMM who have produced nice buildings before but have clearly not been taking their duty of care seriously on this project and have lacked the necessary due diligence for this scale of development.

1. Camden council originally identified the O2 centre, car park and car showroom sites as being allocated for 950 homes. This is a more reasonable number which would indeed make the most of the redevelopment and allow for important community assets including the **large supermarket, gym and swimming pool and large cinema** to continue to exist in this scenario. This is a lot more appropriate for the site and would not over-run the two currently constricted underground stations (West Hampstead and Finchley Road) and the Overground and Thameslink stations.

2. The loss of important community assets will be incredibly detrimental for the area. **This goes against policy C2 setting out there is provision of community facilities and safeguard against their loss.** These include the large Sainsbury, gym and swimming pool and large cinema. Some promise of their retainment does exist however as words this is not acceptable. The plans also do not show their spatial allocation in the new redevelopment. These assets need to be retained in their current form or with complete area for area re-provision.

We cannot have a large supermarket be swapped for one or two smaller ones. We all know a Sainsbury local or Aldi local is more expensive, not as well stocked and inconvenient than the current large Sainsbury. The demographic of the area includes a number of families who rely on large supermarkets for the weekly shop. The redevelopment is clearly aimed at the usual young professionals (although many will not be able to afford the housing anyway) who do a smaller possibly daily shop from a smaller supermarket but given the cost of living crisis and increase in food prices these may well be prohibitive options requiring travelling to larger sites (increase in carbon footprint).

The Gym and Swimming Pool cannot be replaced by a small gym such as a 'pure gym' model which is just a shop window with a couple of machines and maybe a free weight area. The current gym is an important hub as it has many very good facilities, gym classes and very importantly **a 25m pool (which must be retained)**. In fact many people in the area including myself learned to swim there and continues to be an important asset. The 25m pool at the Swiss cottage leisure centre is already over capacity and will become completely overrun should there be a loss of sporting facilities. **There has not been any consultation with Sport England on the question of loss of sporting facilities required. The current plans do not comply with your policy C3 on leisure and cultural facilities.** This also extends to the cinema which is currently the most affordable cinema in the area. Removing such a facility and the supermarket will only increase inequality and access to community assets in the area. The removal of the gym will lead to decrease in health and wellbeing as these aren't sufficient alternatives with enough capacity, many may in fact choose to go further away requiring heavier vehicle use which contradicts the climate emergency declaration the council has declared.

3. The application claims there will be new step free access to West Hampstead Station. This in itself is positive, nevertheless it does not increase the capacity of the station. The station is already saturated, as

is Finchley Road underground and overground and Thameslink. As an architect and expert in transport infrastructure having worked on a number of TfL projects including Bank Station, the key at that station for increasing capacity had a lot to do with, firstly, increasing floor area to accommodate extra flow of people but vitally the capacity of the trains itself. Bank station was able to not become fully saturated because it has multiple high capacity lines but also the opening of the Elizabeth line nearby. For West Hampstead and Finchley Road to not become even more overcrowded you would need a new transport connection such as new platforms for the Chiltern railway which could be a fast route to Marylebone. Of course this is not being offered as it is expensive for the developer but is the only way you would alleviate congestion. On West End Lane, a comprehensive super-hub linking the Underground, Overground and Thameslink stations would also be the only way to alleviate congestion along that dangerous stretch of road. **This development is not compliant with Policy T3 of your local plan.**

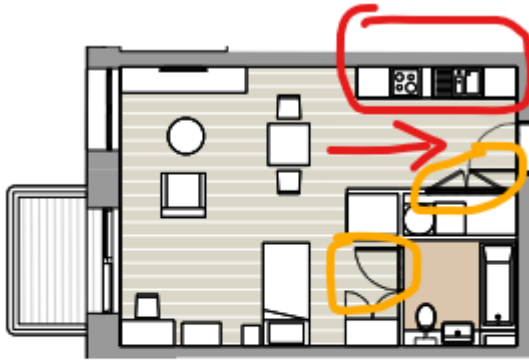
4. The current plans demonstrate a willingness to maximise residential accommodation in detriment to the quality of housing being provided. The plans do seem to show some updates to comply with the upcoming building safety laws which require two escape cores for tall buildings although no details on dry risers for firefighting etc. This is a very serious issue and we have all witnessed the tragic consequences of improper fire engineering.

There is some detail study on how building elevations and designs have been put together referencing historic and listed examples from the area, one serious flaw is that all historic examples are harmonious because of their scale, if you extrude these up 20 stories they no longer work and in fact look terrible which is detrimental to the various surrounding conservation areas. The flats themselves do not seem to have been well planned with various awkward spaces, terrible kitchen placements and overlapping door swigs between doors and cupboards.

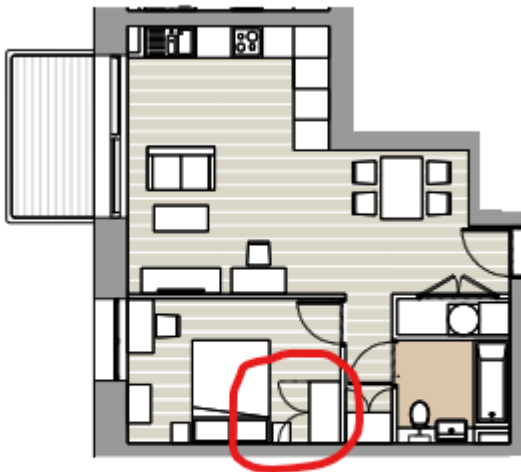
For kitchens according to the London Design Guide, you should have a rotation circle space which many flats do not achieve. In fact flat N3-E-09-01 has a kitchen sink located at an angle from the wall below where someone with accessibility issues would be highly constricted. The last cabinet would also not open properly and become a dust and mould trap impairing the user's health. This level of detail needs to be thought through and exposes serious flaws for the sake of development.

For typical studio N5 - M4 the bathroom and wardrobe door swings clash and the main door and storage cupboard also clash. The kitchen is also located by the main door meaning you have to escape the flat by it during a fire. **This is not fire compliant as the kitchen is considered to be the main possible fire source in a flat. This means should a fire occur in the kitchen the user of this flat is trapped with no other room to escape to which could be fatal.** Let this email exist as evidence averting to this hazard under CDM regulations and non-compliance.

There are numerous examples of these mistakes in all flat types, in fact as shown in the screenshot below in N4 - Typical 1 Bed 2 person M4, the wardrobe door clashes with the bed side table. This is a gross error which would not be tolerated by a university student let alone by an established practice. This just shows the lack of planning and consideration that has been put forward in this development. This is a mistake that repeats throughout the whole development and is in compliance with building regs especially Part M and B. (I am referring to proposed plans and pages 151-153 in the DAS). It can only be concluded that this is a low quality, ill considered development.



● N5 - Typical Studio M4 (2)



● N4 - Typical 1 Bed 2 Person M4 (2)

5. The neighborhood lanes in between blocks being proposed will be wind swept and dangerous. As shared spaces with homogenous paving across pavement and road this is likely to cause serious accidents between pedestrians and vehicles. Although the development is deemed car-free, there will still be many vehicles circulating such as deliveries and those accessing disabled parking spaces. With 1800 homes, there is likely to be heavy delivery vehicle circulation, many of which we know are reckless in their driving, creating shared spaces is likely to increase collisions with pedestrians. Given this is a 'private development' there is not proper control of speed or observation of traffic laws. The second point in this regard is that many of those with accessibility requirements who drive are more likely to be confused by the lack of definition on the

road. This has been highlighted in the shared space on Exhibition Road in South Kensington. Pedestrians who have full or partial sight issues cannot see the edges of their safe pedestrian space which has led to unfortunate accidents. These spaces need to be reconsidered given the actual volume of vehicles using these roads are actually going to be very high. Raising this point, it is important to note this will have even worse effects on Finchley Road which is already very traffic ridden. Many times, when there are issues in front of the O2 Centre, traffic builds up in all surrounding residential roads in the South Hampstead and Swiss Cottage Areas. Such a proposal will cause this to occur and reduce our quality of life due to increased pollution and congestion. **This goes against policy T3.**

6. Sustainability is a huge question in this project as demolition and construction has been completely ignored in any sustainability argument. Concrete for construction, steel fabrication and demolition is a highly carbon intensive activity. Not mentioning the hundreds of other products required such as intumescent paint for steel fire protection, paint VOCs for finishing, plastering, tiling etc etc. The current O2 Centre being a major development and relatively new, should not be demolished a mere 20 years after construction. It can be retrofitted, in fact many practices involved in this project have signed up to the Architect's Journal Retrofit First campaign and should live up to their own strategy and campaigning. There is no doubt the car park could potentially be better used but it's complete rip up to replace with towers is in fact more harmful in the embodied carbon required for the buildings, construction pollution from the thousands of vehicles, and materials transported to site, many from outside the UK due to being more cost effective. Therefore any argument of what is being proposed is better for the environment has to be severely questioned as it is likely to be more harmful due mainly to the sheer volume of construction being proposed. **For a zero carbon development as per Policy CC1 to occur, the O2 has to be retained.**

7. A Cycling East West Cycling Route is being proposed on the site. As a cyclist in the area myself I can confirm that such a cycleway will be completely useless. Nobody travels east west along this site for a simple reason, on each end of the site, there is nowhere to go to. Finchley Road and West End lane a parallel to each other, if you are cycling along them you would simply continue north-south. For there to be a proper alternative quiet cycling route, a route from priory road bridging over the TFL Tracks and NR Tracks to Lymington Road would be needed. Although it can be challenging to bridge over rail tracks, it is

entirely possible with off-site construction and using the 5/6 rail closure days around Christmas to do this very cost effectively. This would be a cycling game changer as it finally creates a safe cycling route north south in the region where all cycling traffic is going to. To claim there is a new cycle route in the region is a marketing ploy which will not change anything for cyclists in the area.

8. When one looks at the plans, one cannot see any park in the proposal. There are in fact two squares and a 8-10m corridor with planted trees. The current marketing campaign cannot be described as anything other than an insult to us. Although I admit it can be hard to define what a park is, if there was any interest to provide green space to the community, the entire site would just become a park without any development. This would be truly transformational not a corridor with trees. My further worries is that there is no evidence of CFD analysis which would probably demonstrate that the volume, height and orientation of the buildings will create multiple wind corridors making the areas below uninhabitable. In fact wind swept environments are worse for the environment as wildlife would not roost or be encouraged to come as they are unable to nest properly. With two empty areas on each side due to the train tracks this scenario is almost certain. To partially avoid this, planting of fully grown trees would be required from the outset which is highly unlikely due to cost. There is also a concern in terms of safety and security at night as planted residential corridors tend to become hotspots for crime **going against Policy C5**.

9. This development, due to its height, will dominate the local skyline and will affect views from thousands of residents as far as Highgate. Many people will lose their sightlines to the city centre and to important landmarks such as St Paul's Cathedral which has many protected viewing corridors. Although there are not viewing corridors in question, the historical view of St Paul's is a heritage question which has not been addressed, especially since this development would be seen from the top of Primrose Hill, a protected viewing corridor if you turn around. **This has to be considered with policy D2**.

10. Finally, we know this development may well increase supply of housing but not meaningfully, they virtually will be outside the price range of most people, even for the 'affordable' housing being proposed. For there to be meaningful housing supply, Social Housing has to be provided which has not been proposed. In fact such developments, as well documented across London, have only helped increase inequality handing further housing assets to a minority of landlords or being

brought for money-laundering often by foreign owners. Across the borough there are already so many examples of this which only increases criminality in the area and such a development will be no different. Social housing needs to be provided, if this development is such an opportunity as identified by Camden, why has social housing not been proposed?

Above are my reasons for objecting this proposal and would like the planning officer and committee to take these seriously in their entirety. Any approval of the plans especially in regard to building regs and fire safety will be regarded as the council and design team as being negligent to people's safety for the sake of the potential section 106 returns which should not be used at such large cost to the surrounding community. What I do not understand is how Camden Council have been brought over from their own plan of providing 950 homes to over 1800 and why this would ever be considered appropriate. Together with the reasons above, I object to planning application 2022/0528/P and object so as an Architect and Specialist and as a local resident in the South Hampstead Area.

Kind Regards,

Raphael

**Raphael Iruzun Martins AADip. ARB RIBA  
Architect**

**CC.d Tulip Siddiq MP and Swiss Cottage Councillors**

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