

From: Thomas Kearsey
Sent: 28 March 2023 23:28
To: Planning
Subject: Objection to Planning reference 2022/0528/P

Dear Planning Team,

I hope this message reaches you well.

I am getting in touch to object to Planning Application 2022/0528/P (O2 Centre and associated areas Site) in the strongest possible terms.

Firstly, I apologise for the late arrival of this message, I hope it can be of some informative use to sustain the O2 Centre in its existing form.

Flooding and Drainage—Flash Flooding and Floodwater Displacement

Large parts of the Site are shown to experience flooding in the design Medium Risk Surface Water Flood (1 in 100 year) Event. Flood depths widely exceed **0.6m**, or **2 feet** in this Design Event. Development Proposals entail a large increase in built extent in these design flood areas, thus causing great amounts of displacement of floodwaters.

The Flood Risk and Coastal Change PPG was updated in August 2022, and requires planners to meticulously take care to avoid displacing flood waters from all sources. The Flood Risk Assessment and Drainage Strategy for this Site were written before this date, and hence do not include such important analysis. Displacement of flood waters from the Site, and therefore an increase in flood risk to surrounding areas is as such likely from the Development Proposals.

Surface Water Run-off

Policy SI 13 of the London Plan (2021) requires all new developments achieve **Greenfield runoff rates**. The Development Proposals do not even come close to achieving this in the Drainage Strategy. It is critical that a lower run-off rate from the Site is achieved.

Camden's technical review of local flooding in July 2021 detailed how the topography of West/South Hampstead, coupled with Victorian Combined Sewers/culverts means the nature of the O2 Centre Site greatly influences flood risk in South Hampstead. Surface waters and sewers run south from the

Site, towards Belsize Road. This neighbourhood has experienced severe flooding from surface water and sewer sources in 1975, 2022, 2021, and again from a burst water main at Christmas 2022. The Site is, but for traces, impermeable as existing, and must be drained sustainably to provide respite to this local area.

As shown by the South Hampstead Flood Action Group, and Private Planning Consultant's analysis, the Proposed Development's Drainage Scheme falls woefully short of the London Plan's requirements for sustainable drainage. The outfall is proposed to release run-off at 260 litres/second, more than 10 times the Greenfield rate of 21.6 litres/second for the Site. Why can't more attenuative storage be provided on Site, to reduce the run off rate into the sewer?

This outfall is proposed to a combined Sewer, the least sustainable option for any drainage strategy. It is not clear whether Thames' sewers have capacity for foul water from an additional 1,800 dwelling. The combined sewer proposed to take effluent from the Site has a capacity which would be overrun in the 1 in 10 year surface water flood event. Such sewer flooding occurred in the South Hampstead Area in July 2021, resulting in gutting of basement/lower ground floor properties in South Hampstead, to go with the surface water flooding.

These issues together mean the Development Proposals would fail to reduce the surface water and sewer flood risk in nearby areas like South Hampstead.

Architecture, Building Heights and Loss of Light

The Site is not situated within a Conservation Area, however five such areas either border, or are situated close to, the Site. The Proposed Development is totally out of sync with the beautiful red brick Victorian/Edwardian streetscapes found in of much of these neighbouring areas. Furthermore, the towers, some in excess of fourteen floors, would be an eyesore for much of the views from these areas.

This Site certainly requires residential housing, maybe 800 units as suggested in previous Camden Policy documents. 1,800 units would result in a ridiculous Site density with 315 units per hectare. Limiting the development Proposals to six storeys would definitely be a smart idea to avoid overshadowing dozens of other residential properties.

Affordable Housing

The London Plan (2021) and Camden policy requires >50% of new residential housing to be 'affordable' in nature. The Development Proposals fail to meet this requirement, with just 35% of earmarked as 'affordable'.

It is also understood that the need for family homes across LB Camden is greatest. 13% of residential units are proposed as 3 bedroom, and none as 4 or more bedrooms. This development will do little to exacerbate the shortage of homes for those who need them most, and allow those who need them least, i.e. multiple home owners, to easily purchase.

Transportation

The influx of new residents from 1,800 residential units will swamp an already at/above capacity local transportation network. Stations such as West Hampstead Tube, and Finchley road have little chance to increase capacity to allow new residents to safely use TFL services. Pavements on West End Lane and Finchley Road are likewise crowded as existing, and may become unsafe with the Development Proposals as currently submitted.

Shops and other amenities

The loss of two large supermarkets, Sainsbury's and Aldi, for 8+ years is a terrible idea. There is no capacity in the local area for purchase of groceries by regular shoppers at these supermarkets. Expecting half the local residents to purchase all groceries online is not acceptable, or to travel considerably further away, is not acceptable.

Carbon

Demolishing structures from 1998 represents a great loss of built Carbon. With many post-war buildings so often replaced, it is a travesty that this humungous source of CO2 is so often overlooked in the planning process.

While as above, I am in favour of modest residential development in the west of the Site and/or car park, the replacement of the O2 Shopping Centre itself is completely unthinkable. The 15 year (probably longer, let's be honest) construction time will certainly make many people want to live elsewhere. I hereby strongly encourage councillors to reject the development in its current form, and suggest significant sensible modifications in the design of the Development Proposals.

Thank you,

Tom Kearsey,

Resident of Alexandra Road, South Hampstead, NW8 0DR.