

The O2 Centre Masterplan S73 Submission

ES VOLUME 2: TOWNSCAPE, HERITAGE AND VISUAL IMPACT ASSESSMENT: ADDENDUM

S73 Application
Tavernor Consultancy, January 2025



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1 Introduction

- 1.1 This Townscape, Heritage and Visual Impact Assessment Addendum (THVIA Addendum) has been prepared by Tavornor Consultancy Ltd on behalf of LS (Finchley Road) Limited (“the Applicant”), to support a Section 73 application which seeks to vary planning permission ref. 2022/0528/P, granted on 20 December 2023, in respect of the O2 Masterplan Site (“the Site”) within the London Borough of Camden (“LBC”). The original planning permission was a hybrid permission i.e. part of the application was submitted in detail and part in outline. This constitutes the “Consented Scheme”. Whilst the Section 73 application will grant a new planning permission for the entire Site, amendments are only proposed to the Detailed Element. The Outline Elements will be unaffected by the proposed changes except for a minor reduction in the maximum floor area proposed.
- 1.2 The Site is subdivided into 10 Development Plots (N1, N2, N3, N3-E, N4, N5, N6, N7, S1 and S8). These are identified on Parameter Plan ref. 19066_X_(02)_102. The 10 plots sit within three indicative phases.
- 1.3 The proposed Section 73 amendments relate to Development Plots N3E, N4 and N5, and the associated landscaping, access roads and infrastructure. These plots are located in the centre of the Site and are approved in detail as they form the first phase of the development – the “Detailed Element”. The Detailed Element of the Site extends to 1.79ha.
- 1.4 Development Plots S8, N7 and N6 located in the west of the Site are approved in outline and form “Outline Element West”. Development Plots N3, N2, N1 and S1 located in the east of the Site are approved in outline and form “Outline Element East”. These plots together are referred to as the “Outline Elements.” The Outline Elements are not affected by the amendments proposed as part of this Section 73 application except for a minor reduction in the maximum floor area proposed.
- 1.5 The amendments proposed as part of this Section 73 application are herein referred to as the “Proposed Development”.
- 1.6 In summary, the Section 73 design amendments relate principally to the Detailed Element and involve adjustments to the height, massing and footprints of the buildings; the replacement of Block N4D with a two storey community centre; new landscaping and additional public realm; revisions to architecture; and revisions to unit mix and internal layouts. Overall, there is an increase in floorspace of 5,766 sqm (GIA) for the Detailed Element compared with the Approved scheme, an increase of 43 residential units, an increase in the size of the community centre and a slight reduction in commercial floorspace (-8sqm GIA). The affordable housing provision remains the same at 36% of the floorspace (GIA).
- 1.7 While there is an increase in the floorspace proposed in the Detailed Element, there is a corresponding reduction in floorspace in the Outline Elements such that overall, there is no change proposed to the total floorspace permitted for the O2 Masterplan as a whole, apart from an 8sqm (GIA) reduction in commercial floorspace from the Detailed Element.

- 1.8 The Proposed Description of development is as follows:
“Application under Section 73 of the Town and Country Planning Act 1990 (as amended) to vary Conditions I4 (Severability Condition), AD1 (Approved Drawings - Masterplan), AD2 (Approved Drawings - Reserved Matters), AD3 (Approved Drawings - Phase 1), RM1 (Parameter Plans and Development Specification), RM6 (Phasing Plan), RM11 (Reserved Matters – Access Statement), RM21 (Reserved Matters – Total floorspace), D20 (Photo-voltaic Cells), D21 (Phase 1 Long Stay Cycle Parking), D22 (Phase 2 Short Stay Cycle Parking), D24 (Phase 1 Disabled Car Parking), D26 (Phase 1 Fire Safety Implementation of Approved Measures), and M28 (Phase-Wide Lighting Strategy) and the removal of Conditions M6 (Enabling Works) and M7 (Major Utilities Infrastructure) of planning permission ref. 2022/0528/P dated 20 December 2023 for ‘Detailed planning permission for Development Plots N3-E, N4, and N5 and Outline planning permission for Development Plots N1, N2, N3, N6, N7, S1 and S8, including demolition of all existing structures and associated works, and redevelopment to include residential development (Class C3), commercial, business and service uses (Class E), local community uses (Class F2), and Sui Generis leisure uses (including cinema and drinking establishments) together with all landscaping, public realm, cycle parking and disabled car parking, highway works and infrastructure within and associated with those Development Plots, in accordance with the Development Specification. For the avoidance of doubt, the Detailed and Outline planning permission are separate and severable for each of the Plots shown on plan P011 and the description of development on any decision notice issued pursuant to the application would reflect that’, to allow for amendments to the Detailed Element (Plots N3-E, N4 and N5) including additional height, alterations to the design, massing and footprint of the buildings; the replacement of Block N4D with the relocated community centre; additional residential floorspace (and corresponding reduction in floorspace within Outline Elements); revisions to unit mix and internal layouts; additional community (Class F2) floorspace, reduction in retail (Class E,a) floorspace, reduction in professional services (Class E,c) floorspace, additional blue badge parking and cycle parking; revised landscaping and additional public realm; and associated works”.
- 1.9 Full details and scope of the Section 73 application are described in the submitted Planning Statement Addendum, prepared by Gerald Eve LLP and the Design and Access Statement prepared by GRID.
- 1.10 This report forms an addendum to the Townscape, Heritage and Visual Impact Assessment (THVIA) submitted in December 2022 (“the December 2022 THVIA”) as ES Volume 2 of the approved planning permission (ref. 2022/0528/P). The December 2022 THVIA reported the likely significant effects of the development on existing townscape, visual and built heritage receptors during the construction and operational phase. This THVIA Addendum has been prepared in order to outline the key changes in relation to the Consented Scheme and to identify any changes to the findings and conclusions associated with the 2022 ES.

Planning Policy Context

- 1.11 A review of UK legislation, planning policy and guidance relevant to the proposals has been previously undertaken as part of the 2022 ES.
- 1.12 New, updated or draft planning policy of relevance to this assessment has been issued since the December 2022 THVIA, including:
- The Levelling-up and Regeneration Act 2023;
 - National Planning Policy Framework (NPPF) (December 2024);
 - Historic England Advice Note 4: Tall Buildings (2022); and
 - Draft New Camden Local Plan Regulation 18 Consultation Version (January 2024).
- [The Levelling-up and Regeneration Act 2023](#)
- 1.13 The Levelling-up and Regeneration Act 2023 received Royal Assent on 26 October 2023. Part 3 of the Act deals with Planning, and Chapter 3 addresses Heritage. The Act includes (at section 102(1)) a new, proposed section 58B, “Duty of regard to certain heritage assets in granting permissions”, to be inserted into the Town and Country Planning Act 1990 at a future date (to be set by regulations). This will, when it comes into force, provide (in sub-section (1)) as follows: “In considering whether to grant planning permission or permission in principle for the development of land in England which affects a relevant asset or its setting, the local planning authority or (as the case may be) the Secretary of State must have special regard to the desirability of preserving or enhancing the asset or its setting.” This includes “preserving or enhancing any feature, quality of characteristic of the asset or setting that contributes to the significance of the asset” (sub-section (2)). “Relevant assets” and their “significance” are identified in sub-section (3), and for example, a World Heritage site is a “relevant asset” and its “significance” is the outstanding universal value referred to in the UNESCO World Heritage List.
- 1.14 Section 102(3) of the Act will (again at a future date to be set by regulations) make amendments to Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990 such that, in considering whether to grant listed building consent for any works, special regard shall be had to the desirability of preserving or enhancing the listed building or its setting or any features of special architectural or historic interest which it possesses.
- [National Planning Policy Framework \(NPPF\) \(December 2024\)](#)
- 1.15 The updated NPPF (December 2024) strategic guidance pertaining to design and conserving and enhancing the historic environment remains in alignment with the 2021 version. The changes to this document are not considered to represent a material change in terms of townscape, visual and heritage assessment.
- [Historic England Advice Note 4: Tall Buildings \(2022\)](#)
- 1.16 This guidance updates the first edition of Advice Note 4, published in 2015, in light of changes to national planning policy and guidance and HE’s experience of planning for tall buildings in the historic environment. The updated Advice Note carries through

<p>the same broad approach to the 2015 guidance. The document notes that “<i>tall building proposals that take account of the historic environment and are designed to avoid or effectively mitigate harm to it, would constitute sustainable development in heritage terms</i>” (para. 2.2). It recognises that “<i>Good design can ensure that tall buildings respond positively to the character of the surrounding area and the historic environment and can be used creatively to achieve sustainable outcomes.</i>” (para. 2.7), and “<i>In the right locations tall buildings can support major change or regeneration while positively influencing place-shaping and conserving the historic environment</i>” (para. 3.1). However, “<i>If a tall building is not in the right place, by virtue of its size and widespread visibility, it can seriously harm the qualities that people value about a place. There will be locations where the existing qualities of place are so distinctive and the level of significance of heritage assets so great that tall buildings will be too harmful, regardless of the perceived quality of the proposal’s design and architecture.</i>”</p>	<p>Centre, car park and car showrooms site’ which was included in the <i>Draft Camden Site Allocations Local Plan</i> (February 2020) referenced in the January 2022 THVIA.</p>	<p>1.26 The Site is identified as a location where tall buildings may be an appropriate form of development on Map 13 – noted as location ‘m’.</p>	<p>been updated in Section 4.0 have been agreed with LB Camden planning officers.</p>
<p>1.17 The guidance does not define a tall building, stating that the Greater London Authority’s (GLA) London Plan requires boroughs to define what is tall based on local context and, for situations where this is not possible, there is a minimum threshold that can be applied contained in London Plan Policy D9.</p> <p>1.18 Section 4 of the Historic England Advice Note 4: Tall Buildings (2022) provides a list of the factors that should inform the approach to tall building design. This includes: response to local context; impact on the local environment; architectural quality; functional design; sustainable design and construction; and a well-designed inclusive environment. In Section 5, the guidance notes the importance of technology and visualisations in helping to communicate the proposed appearance of new developments and aiding the assessment of built heritage impacts. The Advice Note also outlines mitigation measures for reducing harm to the historic environment and further notes the importance of considering cumulative impacts.</p> <p><u>Draft New Camden Local Plan Regulation 18 Consultation Version (January 2024)</u></p>	<p>1.22 Site allocation W2 in the Draft New Local Plan acknowledges that “<i>The Council has resolved to grant planning permission 2022/0528/P (subject to referral to the Mayor), approving a masterplan for redevelopment of the whole site, which is divided into three phases. The Council has resolved to grant full planning permission for the first phase of the site (former Homebase store and part of the existing car park) and outline permission for the two other phases, subject to detailed reserved matters submissions.</i>”</p> <p>1.23 The site allocation outlines a series of development and design principles. It further notes that: “<i>The Camden Building Heights Study has identified this site as a location where tall buildings may be an appropriate form of development, with 9m - 54m considered the potentially appropriate height range. It notes that the Council has resolved to grant planning permission for a development ranging in height from 33 - 61m. That decision was based on an assessment of the impacts and benefits of that specific development, and it should not therefore be assumed that the permitted height would necessarily be appropriate for any subsequent development. The acceptability of particular tall building proposals, and their location within the site, will be assessed against Policy D2 on tall buildings and other relevant development plan policies.</i>”</p> <p>1.24 Chapter 12 of the Draft New Local Plan includes policies relating to design and heritage. Policy D1: Achieving Design Excellence, states that all development in Camden must achieve excellence in the architecture and design of buildings and places. Of particular relevance to the assessment of effects on townscape, visual and built heritage receptors, Policy D1 outlines that the Council will require that development:</p>	<p>1.27 Part C of Policy D2 states that “<i>The Council will assess proposals for buildings above the threshold heights set out in (A) above against the London Plan tall buildings policy and the design criteria in Policy D1 (Achieving Design Excellence).</i>” Particular attention will also be given to a number of criteria; those most relevant to the assessment of effects on townscape, visual and built heritage receptors include:</p> <ul style="list-style-type: none"> i. “<i>how the building relates to its surroundings, both in terms of how the base of the building fits in with the streetscape and how the top of a tall building affects the skyline, having regard to both the existing and the emerging context;</i> vi. <i>whether the site is of a sufficient size to accommodate a tall building, without having a detrimental impact on existing buildings, the public realm and amenity;</i> vii. <i>the historic context of the building’s surroundings;</i> viii. <i>the relationship between the building and hills and views, ensuring that any proposal responds to local views and preserves protected views;</i> ix. <i>the contribution a building makes to pedestrian movement, connectivity and improved public accessibility.</i>” <p>1.28 Policy D5: Heritage states that: “<i>The Council will preserve and, where appropriate, enhance Camden’s rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.</i>” In regard to designated heritage assets, Policy D5 states that: “<i>The Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage asset unless the public benefits of the proposal convincingly outweigh that harm.</i>”</p>	<p>1.32 There are no changes to the cumulative schemes that were assessed in the 2022 ES and therefore the same cumulative schemes have been shown as wirelines in the verified views where visible and all cumulative effects as reported in the December 2022 THVIA remain the same. A map illustrating the locations of the cumulative schemes is included in Appendix B.</p> <p>Consultation</p> <p>1.33 The proposed Section 73 amendments have been discussed with LBC during a period of pre-application consultation relating to all aspects of the design, including the proposed height, scale, massing and architectural design changes. Pre-application engagement also took place with the Camden Design Review Panel, the Strategic Panel, the GLA and Historic England. A summary of the pre-application consultation is included in the DAS, Planning Statement Addendum and Statement of Community Involvement.</p> <p>Baseline Conditions</p> <p>1.34 The baseline conditions for the assessment are as set out in the December 2022 THVIA.</p> <p>1.35 There are no additional designated or non-designated heritage assets within the identified study area.</p> <p>1.36 The Townscape Character Areas (TCAs) identified and assessed in the December 2022 THVIA remain relevant and appropriate and there have been no significant changes to the baseline conditions.</p> <p>1.37 The assessment views identified in the December 2022 THVIA remain relevant and appropriate. The baseline conditions of each of the views that have been agreed to be updated for this THVIA Addendum have been reviewed and there have been no significant changes to the baseline conditions. As such, the original winter photography as presented in the December 2022 THVIA has been re-used for this THVIA Addendum.</p>
<p>1.19 LBC undertook a Regulation 18 consultation on a draft new Local Plan between 17 January and 13 March 2024. A further round of consultation (Regulation 19) is anticipated for winter 2024/ spring 2025. Following the second round of consultation, the draft new Local Plan will be finalised and submitted to the Secretary of State for examination between spring and summer 2025. Examination is anticipated between autumn and winter 2025, with adoption currently targeted for winter 2025/ spring 2026.</p> <p>1.20 Considering the Plan is still at an early stage in its preparation, the draft policies within it are to be given limited weight in the determination of planning applications at this stage. However, for completeness, the draft policies that are relevant to the assessment of townscape, visual and built heritage effects are outlined in the following paragraphs.</p> <p>1.21 The Draft New Local Plan outlines a number of site allocations throughout the borough. Site allocation ‘W2: O2 Centre, carpark and car showroom sites and 14 Blackburn Road’ includes the Site. This site allocation is proposed to replace ‘Policy WHI2 – O2</p>	<ul style="list-style-type: none"> i. “<i>responds positively and sensitively to local context and character through layout, orientation, scale, height, bulk massing, proportion, appearance and the use of high quality, durable and sustainable materials;</i> ii. <i>seeks to create character where none exists;</i> iii. <i>preserves or enhances the historic environment and heritage assets in accordance with Policy D5 Heritage;</i> iv. <i>responds to local views and preserves protected views.</i>” <p>1.25 Policy D2: Tall Buildings states that:</p> <ul style="list-style-type: none"> a. “<i>The Council defines tall buildings as buildings that are over 40 metres in height in the Central Activities Zone and over 30 metres elsewhere in the borough, when measured from the lowest point on the ground to the uppermost part of any rooftop structures (including plant and lift overruns), as shown on Map 13.</i> a. <i>Locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Local Plan, are identified on Map 13 below and listed in Appendix 2. Guidance on building heights for specific sites is set out in the relevant site allocation policies.</i>” 	<p>1.29 In regard to conservation areas, Policy D5 states that the Council will “<i>resist development outside of a conservation area that causes harm to the character or appearance of that conservation area.</i>” Similarly, in regard to listed buildings, Policy D5 states that the Council will “<i>resist development that would cause harm to the significance of a listed building through an effect on its setting.</i>”</p> <p>Assessment Methodology</p> <p>1.30 The assessment methodology is unchanged from that used in the December 2022 THVIA. This includes the extent of the study areas for townscape, visual and built heritage receptors, and the method of baseline collection and method of assessment.</p> <p>1.31 A number of the verified views presented in the December 2022 THVIA have been updated by visualisers Cityscape and are included in Section 4.0 of this addendum report. The views that have been updated include both rendered and wireline views in which the proposed massing and architectural design changes to the consented scheme would be perceptible. The views that have</p>	<p>Summary of Scheme Changes</p> <p>1.38 The following paragraphs provide an overview of the key proposed design changes to the Consented Scheme that are relevant for the assessment of townscape, visual and built heritage effects. Full details of the Proposed Development are set out in the Design and Access Statement (DAS) and planning drawings prepared by GRID.</p> <p>1.39 As aforementioned, the proposed Section 73 amendments relate to Development Plots N3E, N4 and N5, and the associated landscaping, access roads and infrastructure. These plots are located in the centre of the Site and are approved in detail as they form the first phase of the development – the “Detailed Element”.</p> <p>1.40 The Section 73 scheme involves adjustments to the height, massing and footprints of the buildings; the replacement of Block N4D with a two-storey community centre; new landscaping and additional public realm; revisions to architecture; and revisions</p>

to unit mix and internal layouts. Overall, there is an increase in floorspace of 5,766 sqm (GIA) for the Detailed Element compared with the Consented Scheme, an increase of 43 residential units, an increase in the size of the community centre and a slight reduction in commercial floorspace (-8sqm GIA). The affordable housing provision remains the same at 36% of floor area (GIA). While there is an increase in the floorspace proposed in the Detailed Element, there is no change proposed to the total floorspace permitted for the O2 Masterplan as a whole, except for a minor reduction in the maximum floorspace proposed.

- 1.41 A number of height and massing changes are proposed to Development Plots N3E, N4 and N5, including the following:
- Reconfiguration of Development Plots N4 and N5 for improved design rationalisation, leading to a smaller N4 building footprint and removal of N4D. Block N4D will be replaced with a relocated 2-storey community centre, creating an important community destination and a larger sense of space at the centre of the masterplan. The massing of Block N4C will be slightly increased to the south towards the new 2-storey community centre, however, the massing of N4B will be pushed back from the southern edge to increase the public realm along the green spine that follows the southern boundary of the Site.
 - Reduction of typical floor to floor heights from 3250mm to 3150mm.
 - Additional height is proposed to a number of the blocks, including:
 - N3E – 12-storeys (+2-storeys on the Consented Scheme)
 - N4A – 14-storeys plus rooftop plant screen (+1-storey on the Consented Scheme)
 - N4B – 9-storeys (no change from the Consented Scheme)
 - N4C – 16-storeys plus rooftop plant screen (+2-storeys on the Consented Scheme)
 - N4 Link – 9-storeys (+1-storey on the Consented Scheme)
 - N5A – 17-storeys plus rooftop plant screen (+2-storeys on the Consented Scheme)
 - N5B – 10-storeys (no change from the Consented Scheme)
 - N5C – 16-storeys plus rooftop plant screen (+2-storeys on the Consented Scheme)
 - N5D – 10-storeys (+1-storey on the Consented Scheme)
 - N5 Link – 11-storeys (+3-storeys on the Consented Scheme)

1.42 The proposed amendments to the massing and heights of Development Plots N3E, N4 and N5 will retain the over-arching principles of the Consented Scheme masterplan, including the creation of an undulating and varied skyline of tall buildings.

1.43 In addition, changes are proposed to the detailed architectural design of Development Plots N3E, N4 and N5, designed by Heatherwick Studio. The detailed architectural design considers each block from three different scales: the City Scale, the Street Scale and the Door Scale. This is described in detail in the DAS and

summarised below.

- 1.44 The City Scale includes contrasting tonality within the facades, combining a mixture of lighter and darker brick tones, enabling greater visual variation to the skyline through the use of colour. The emphasis is on a combination of darker red tones and lighter oatmeal/buff tones which are both typical of the character of the surrounding townscape, ensuring a contextual response. Chamfers to the corners of the blocks have also been introduced to soften the massing and recall the architectural language and articulation of mansion blocks found within the local area. The tops of the buildings have also been accentuated with detail to provide more articulation and more clearly defined crowns.
- 1.45 The Street Scale principally focuses on the articulation of window reveals and balconies, expressed through a variety of ‘stitch’ brickwork and decorative cast concrete panels. A hierarchy of windows has been created to concentrate fine detailing to zones which are exposed and where it can be most appreciated. The windows at the top of the blocks will have an art relief sill panel and a protruding surround frame. They will be vertically grouped into pairs or triples to indicate the crowns of the buildings. The windows at the lower levels, closer to the ground, will have an art relief sill panel and a ‘stitch’ brick pattern on the surround. The windows in the middle of the blocks will be similar to the ground windows but with a sill panel created by a simpler brick pattern as they will appear less visually prominent. Balconies on exposed facades have been shaped in a polygonal language to enhance them as a distinctive feature and to tie in with the broader massing of the blocks. Balconies on less exposed facades will remain rectangular. The balconies on Block N3E will have rounded edges that are consistent with the rounded corners of the building’s massing. Balcony openings will have a ‘stitch’ brick surround. The windows located within the recessed massing between the blocks will have no additional detailing, ensuring visual and architectural prominence to the main blocks.
- 1.46 At the Door Scale the architectural design focuses on creating variety and interest to everyone that experiences these buildings up close. The polygonal language will therefore be more expressive at this scale, introducing a series of ‘portals’ to the ground floor. A variety of ‘portal’ frames will express the various uses at the ground floor. The main entrances will be most elaborately designed, celebrating the primary entrances with a generous portal and accompanying windows. Duplexes will be defined with more vertical two storey frames to express each home. The commercial units will have various single storey portals and generous windows, whilst the secondary entrances will be signalled with recessed portals that form a level of protection.

2 Assessment of Effects, Mitigation and Residual Effects

Demolition and Construction Phase

- 2.1 There would be no change to the effects, mitigation or residual effects of the demolition and construction phase in regard to townscape, built heritage and visual effects in comparison to the Consented Scheme.

Operational Phase

- 2.2 The potential for revised townscape, built heritage and visual effects as a result of the Proposed Development are considered based on the revised verified views in Section 4.0 of this Addendum. The residual effects for each sub-topic are outlined in the following paragraphs. Mitigation has been considered through the detailed design and there is no need for any additional mitigation measures.

Built Heritage Assessment

- 2.3 The proposed changes would not alter the assessment of the likely effects on any of the designated and non-designated heritage assets assessed in the December 2022 THVIA. There would be no changes to the assessment of the likely effects on built heritage and subsequently the significance of residual effects as set out in the 2022 ES remain valid. This is summarised in further detail in the following paragraphs.

Assessment of likely effects on the character and appearance of the South Hampstead Conservation Area

- 2.4 As demonstrated by Views 11, 12, 14 and 15, like the Consented Scheme, the Proposed Development would represent a change to the northern setting of the South Hampstead Conservation Area. As for the Consented Scheme, due to the prevailing alignment of the east-west streets, the existing building lines and scale, and the density of existing vegetation, the Proposed Development would have no impact on the majority of the Conservation Area, including key views along important east-west roads. Visibility of the Proposed Development would be limited to views from the two north-south roads that align with the Site and, in these views, it would form a minor element in the background, increasing to moderate as the viewer gets closer to the Site. The height, scale and massing of the Proposed Development, and the architectural design of the Detailed Proposals, would ensure that its visible as a sensitive and high-quality addition to the backdrop of isolated views from within the Conservation Area. The minor increase in heights to some of the plots within Phase 1 would not result in any significant changes to the effects on the South Hampstead Conservation Area in comparison to the Consented Scheme. The proposed amended architectural design of the Phase 1 plots would form a high-quality addition to the skyline. The brick tones and colouration would respond positively to the character of the Conservation Area, as would the vertical expression of the architecture and detailing such as window surrounds, chamfered corners and stitched bricks. The plant screens at roof level would comprise 'hit and miss' brickwork to integrate positively with

the brick design of each of the buildings and ensure a cohesive architectural design approach.

- 2.5 As for the Consented Scheme, the special character and appearance of the South Hampstead Conservation Area, which lies in its built form, urban layout, density of mature trees and vegetation, and its suburban character, would be preserved by the Proposed Development in accordance with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. There would be no harm to the significance of the designated conservation area and therefore paras.213 and 214 of the NPPF (December 2024) would not be engaged. The assessment would not alter from the December 2022 THVIA.

Magnitude of Impact (on heritage significance): None

Scale and Nature of Effect: No effect

NPPF assessment: No harm

Assessment of likely effects on the character and appearance of the West End Green Conservation Area

- 2.6 As demonstrated by Views 1 and A14, like the Consented Scheme, the Proposed Development would result in a change to the southern setting of the West End Green Conservation Area by introducing further tall buildings to the existing background of some informal views. As for the Consented Scheme, in View 1 from Crediton Hill, the blocks within Plot N5 would be visible as a pair of slender buildings punctuating the skyline and would step down in height towards the west, resulting in a well-composed skyline of individual elements. The proposed new architectural design would introduce greater variety to the skyline by introducing red-brick to Block N5A. The proposed materials palette and colouration would complement the palette of the Conservation Area, and the vertical expression of the architecture would ensure that the Proposed Development is legible as a secondary, background addition to the Conservation Area.

- 2.7 As for the Consented Scheme, the Proposed Development would form a noticeable degree of change to the background of views from Crediton Hill and therefore to the southern setting of this part of the West End Green Conservation Area, which already includes tall modern buildings including the Nido. The quality of the foreground townscape, which is formed by the large detached and semi-detached houses and trees and planting along the street, would remain the focus of views along the road. The Proposed Development would be clearly legible as a separate, background element which would activate the skyline with high-quality architecture which responds appropriately to the character and quality of the Conservation Area and signifies the wider urban setting in which the Conservation Area lies. The minor increase in heights to the buildings within Plot N5 would not result in any significant changes to the effects on the South Hampstead Conservation Area in comparison to the Consented Scheme.

- 2.8 As for the Consented Scheme, the special character and appearance of the West End Green Conservation Area, which lies in its curved grid of residential streets and variety of housing,

together with its 'green' character and the sloping topography of the area, would be preserved by the Proposed Development in accordance with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. There would be no harm to the significance of the designated conservation area and therefore paras.213 and 214 of the NPPF (December 2024) would not be engaged. The assessment would not alter from the December 2022 THVIA.

Magnitude of Impact (on heritage significance): None

Scale and Nature of Effect: No effect

NPPF assessment: No harm

Assessment of likely effects on the character and appearance of the Fitzjohns/ Netherhall Conservation Area

- 2.9 As demonstrated by View 7, like the Consented Scheme, the Proposed Development would represent a change to the western setting of the Fitzjohns/ Netherhall Conservation Area. The Proposed Development would form a minor height increase from the Consented Scheme in views from Nutley Terrace, visible beyond Outline Element East of the Consented Scheme. This proposed amendment would have no impact on the overall composition of the Proposed Development in views looking west from within the Conservation Area. As for the Consented Scheme, the Proposed Development would remain visible as a coherent group of individual forms and resulting in a consistent and well-considered background skyline to the Conservation Area.

- 2.10 As for the Consented Scheme, the special character and appearance of the Fitzjohns/ Netherhall Conservation Area, which lies in its architectural variety, scale of the residential buildings, hills and gradients of the topography and the significant presence of large mature trees in every street view, resulting in an imposing 19th century townscape, would be preserved by the Proposed Development in accordance with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. There would be no harm to the significance of the designated conservation area and therefore paras.213 and 214 of the NPPF (December 2024) would not be engaged. The assessment would not alter from the December 2022 THVIA.

Magnitude of Impact (on heritage significance): None

Scale and Nature of Effect: No effect

NPPF assessment: No harm

Assessment of likely effects on the character and appearance of the Redington/ Frogna Conservation Area

- 2.11 As demonstrated by View 3, like the Consented Scheme, the Proposed Development would represent a change to the western setting of the Redington/ Frogna Conservation Area. As for the Consented Scheme, from this elevated position within the Conservation Area visibility of the Proposed Development would

be limited to the upper storeys of the tallest buildings within Plots N4 and N5. The existing trees on Langland Gardens would considerably reduce the visibility of the Proposed Development, limiting their presence to a filtered and long-distance glimpse during the winter and entirely screened from view during the spring/summer months. In these filtered winter views, the Proposed Development would be visible as a coherent group of slender buildings punctuating the background skyline. The proposed use of both red-brick and light-coloured brick would add variety to the background skyline and will respond positively to the character and appearance of the foreground Conservation Area.

- 2.12 As for the Consented Scheme, the special character and appearance of the Redington/ Frogland Conservation Area, which lies in its architectural splendour, scale of the residential buildings, steeply rising topography and the significant presence of large mature trees in every street view, resulting in a well-preserved late 19th century and Edwardian residential suburb, would be preserved by the Proposed Development in accordance with Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. There would be no harm to the significance of the designated conservation area and therefore paras.213 and 214 of the NPPF (December 2024) would not be engaged. The assessment would not alter from the December 2022 THVIA.

Magnitude of Impact (on heritage significance): **None**

Scale and Nature of Effect: **No effect**

NPPF assessment: **No harm**

Assessment of likely effects on the character and appearance of the Belsize Conservation Area

- 2.13 As for the Consented Scheme, due to the distance from the Site, the nature of the Proposed Development within Phase 1, alignment of the roads and the existing intervening built development within Belsize Conservation Area, visual testing demonstrated that the Proposed Development would be unlikely to be visible from within the Conservation Area. The Proposed Development is therefore judged to have no impact on the setting of the Conservation Area and would therefore have no effect on its special character and appearance (its heritage significance), or an ability to appreciate heritage significance. The Proposed Development would therefore result in no harm to the Belsize Conservation Area and therefore paras.213 and 214 of the NPPF (December 2024) would not be engaged. The assessment would not alter from the December 2022 THVIA.

Magnitude of Impact (on heritage significance): **None**

Scale and Nature of Effect: **No effect**

NPPF assessment: **No harm**

Assessment of the likely significant effects on the heritage significance of designated listed buildings and non-designated heritage assets

- 2.14 There would be no material change to the effects on the heritage

significance of designated statutory listed buildings and non-designated heritage assets assessed in Table 6-1 and Table 6-2 of the December 2022 THVIA as a result of the Proposed Development in comparison to the Consented Scheme. The aspects of setting of all heritage assets assessed that make a contribution to the heritage significance of that heritage asset would be preserved by the Proposed Development in accordance with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. As for the Consented Scheme, there would be no harm to the heritage significance of any of the surrounding listed buildings that were assessed in the December 2022 THVIA and therefore paras.201 and 202 of the NPPF would not be engaged.

Townscape Assessment

- 2.15 The Proposed Development comprises minor increases to the height and scale of the Development Plots within the Phase 1 Detailed Element of the masterplan in comparison to the Consented Scheme, as well as changes to the architectural design. The overall townscape and design principles of the Consented Scheme have, however, been retained as part of the Proposed Development and as such the appearance of the Proposed Development from the surrounding areas of both designated and non-designated townscape would not be fundamentally altered.
- 2.16 The proposed changes would not alter the assessment of the likely effects on any of the townscape character areas assessed in the December 2022 THVIA. There would be no changes to the assessment of the likely effects on townscape and subsequently the significance of residual effects as set out in the 2022 ES remain valid.

Visual Assessment

- 2.17 Selected views included in the December 2022 visual assessment have been remodelled to show the proposed amendments to the Consented Scheme as set out in Tables 2.1 and 2.2.
- 2.18 The verified views that have been selected to be updated have been agreed with LBC planning officers during pre-application consultation. The updated views are those which include visibility of the Phase 1 proposals and include both wirelines to understand the changes to the height and massing of the Phase 1 plots, and fully detailed renders to show the proposed architectural design. The views that have been agreed with LBC planning officers to be updated are outlined in Tables 2.1 and 2.2.
- 2.19 For each view, the following images have been provided in Section 4.0 of this THVIA Addendum:
1. Existing view;
 2. Proposed amendments to the Consented Scheme; and
 3. Proposed amendments to the Consented Scheme, plus cumulative schemes shown as wirelines.
- 2.20 As shown in the updated verified views in Section 4.0 and Appendix A, the Proposed Development would form a minor

increase in height in comparison to the Consented Scheme. However, the overall townscape and design principles established by the Consented Scheme have been retained. In regard to height, scale and massing, and as shown in long, middle distance and local views, the Proposed Development will continue to form a varied and undulating skyline of individual vertical forms, thus reducing a sense of uniformity in the views. The tallest buildings will continue to be placed on the northern edge of the Site with the building heights stepping down to the south, thus responding positively to the sensitivities of the surrounding townscape. The minor increase in height of the Proposed Development would not result in any increased visual effects in comparison to the Consented Scheme.

- 2.21 Additionally, the proposed changes to the architectural design of the Phase 1 plots would further enhance the skyline through introducing greater visual variety and a strong vertical expression to the design of the buildings. Further articulation of the buildings, including chamfered corners and clearer definition of a base, middle and top to each block, together with architectural detailing, such as 'stitch' brickwork, decorative cast concrete panels and greater variation in brick colour and tone, will add visual interest to the skyline and positively draw upon the character of the existing buildings located within the conservation areas that surround the Site. The proposed changes to the architectural design of Plots N3E, N4 and N5 are considered to be positive and would enhance the character of local, middle- and long-distance views.
- 2.22 In regard to the effect on LVMF 5A.2 (View 19 in Section 4.0) the minor height increase of the Proposed Development compared to the Consented Scheme would not result in any change in the assessment of the impact and resulting effects as assessed in the December 2022 THVIA. As for the Consented Scheme, the overall magnitude of impact on the view is considered to be negligible as the Proposed Development would only be visible at a significant distance, has been designed to respond to the constraints of the protected view and its associated guidance, and would be barely perceptible to the viewer both through the naked eye and a telephoto lens. Given the high to very high sensitivity of the view, a negligible magnitude of impact would result in a minor effect, and this is considered to be neutral in its nature as the composition of the view, and the ability to recognise and appreciate St Paul's Cathedral as a landmark would be preserved, resulting in no harm to the view or the heritage assets within it. The Proposed Development would not result in a significant effect on this designated strategic view.
- 2.23 Overall, the proposed design changes would not alter the assessment of the likely visual effects on any of the verified views assessed in the December 2022 THVIA. There would be no changes to the assessment of the likely effects on visual amenity.
- 2.24 Subsequently, the significance of residual effects as set out in the 2022 ES remain valid.

Table 2.1: Visual Assessment Views included in Section 4.0:

View	Viewpoint Location	Render/Wireline	Remodel for addendum
1	Crediton Hill	Render	Yes
2	Alvanley Gardens	Render	Yes
3	Frogna Lane, opposite Langland Gardens	Render	Yes
4	Fitzjohn's Avenue, opposite Arkwright Road	Wireline	No – proposed changes to Consented Scheme would not be visible.
5	Arkwright Road, at the junction with Frogna	Wireline	No – proposed changes to Consented Scheme would not be visible.
6	Daleham Gardens/ Nutley Terrace	Wireline	No – proposed changes to Consented Scheme better illustrated by View 7.
7	Nutley Terrace, at the junction with Maresfield Gardens	Wireline	Yes
8	Harben Parade	Wireline	No – proposed changes to Consented Scheme would not be visible.
9	Finchley Road, opposite Waitrose	Wireline	No – proposed changes to Consented Scheme would not be visible.
10	Finchley Road, at the junction with Frogna	Wireline	No – proposed changes to Consented Scheme would not be visible.
11	Broadhurst Gardens, near the junction with Canfield Gardens	Render	Yes
12	Broadhurst Gardens, opposite the playground	Render	Yes
13	Finchley Road Station platform	Wireline	Yes
14	Junction of Fairhazel Gardens and Greencroft Gardens	Render	Yes
15	Fairhazel Gardens	Render	Yes
16	West Hampstead Station platform	Wireline	Yes
17	Blackburn Road	Wireline	No – proposed changes to Consented Scheme barely visible.
18	West End Lane bridge	Render	Yes
19	LVMF 5A.2 Greenwich Park: the General Wolfe statue – north-east of the statue	Wireline	Yes

Table 2.2: Supplementary verified views remodelled in Appendix A

View	Description	Render/Wireline	Remodel for addendum
A1	LVMF 6A.1 Blackheath: the Point	Wireline	No – proposed changes to Consented Scheme would not be visible.
A2	Primrose Hill	Wireline	No – proposed changes to Consented Scheme would not be visible.
A3	Regents Park	Wireline	No – proposed changes to Consented Scheme would not be visible.
A4	Frogna Rise/ Frogna	Wireline	Yes
A5	Langland Gardens	Wireline	Yes
A6	Fitzjohn's Avenue, opposite Netherhall Gardens	Wireline	No – proposed changes to Consented Scheme would not be visible.
A7	Finchley Road, opposite Fairfax Road	Wireline	No – proposed changes to Consented Scheme would not be visible.
A8	Boundary Road	Wireline	No – proposed changes to Consented Scheme would not be visible.
A9	Priory Road/ Abbot's Place	Wireline	Yes
A10	Priory Road / Woodchurch Road	Wireline	No – proposed changes to Consented Scheme would not be visible.
A11	Broadhurst Gardens, looking east	Wireline	No – proposed changes to Consented Scheme would not be visible.
A12	Broadhurst Gardens / W Hampstead Mews	Wireline	No – proposed changes to Consented Scheme would not be visible.
A13	Sumatra Road / Pandora Road	Wireline	Yes
A14	Lymington Road / Crediton Hill	Wireline	Yes
A15	Alvanley Gardens – South	Wireline	Yes

Severability

2.25 The updated severability plan shows the extent of the severable area within Plot S8 within the Outline Element West. It is the applicants' firm intention to deliver this plot in accordance with the approved parameter plans through the submission of reserved matters pursuant to the hybrid planning permission. This will maximise the public benefits that will result from the development. However, it is recognised that an extant planning permission (ref PWX0202103), together with an extant section 73 permission (ref. 2023/1292/P), (collectively the "Builder's Merchant Scheme"), exist in relation to this part of the Site, and as a consequence this area has been identified as severable. In order to ensure a robust approach, an assessment has been made of the environmental impacts that would potentially arise in the event that the Builder's Merchant Scheme is brought forward under those existing extant planning permissions rather than this area being developed pursuant to reserved matters under the O2 Masterplan development.

2.26 In regard to the assessment of effects on townscape, built heritage and visual effects, the severability of the relevant part of Plot S8 would not result in any new or altered effects beyond those assessed in the 2022 ES. In View 16 (West Hampstead Station platform) and View 17 (Blackburn Road), Plot S8 would be the most visually prominent building in the foreground of the view. If the Builder's Merchant Scheme is brought forward, there would be a change to these views, however, given the similarity in scale between the Builder's Merchant Scheme and the parameters for Plot S8, set out in the Proposed Development (and is unchanged from the Consented Scheme), it is not considered that this would result in new or increased townscape or visual effects beyond those assessed in the December 2022 THVIA.

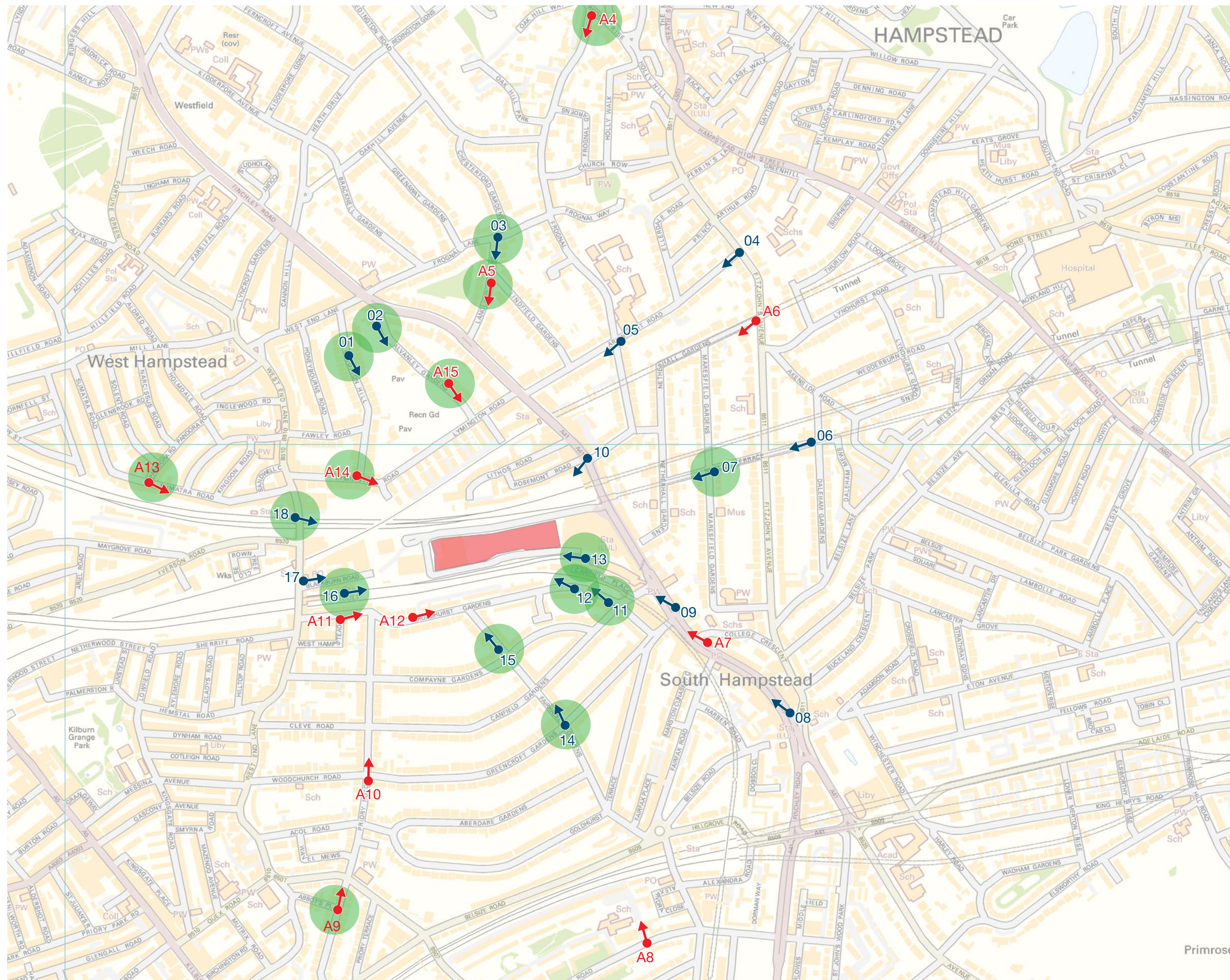
Limitations and Assumptions


2.27 There are no additional limitations and assumptions for the assessment of townscape, built heritage and visual effects beyond those set out in the methodology in Section 3.0 of the December 2022 THVIA.

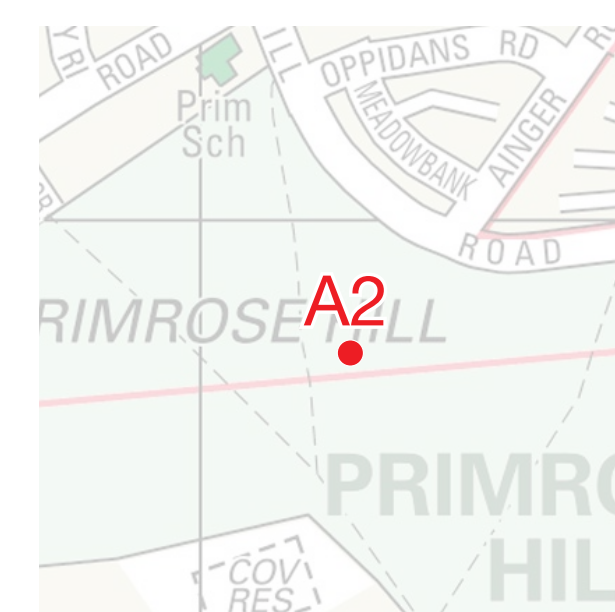
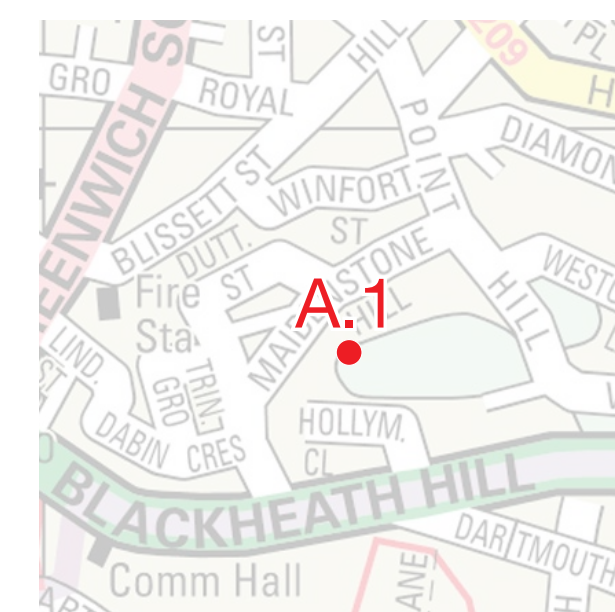
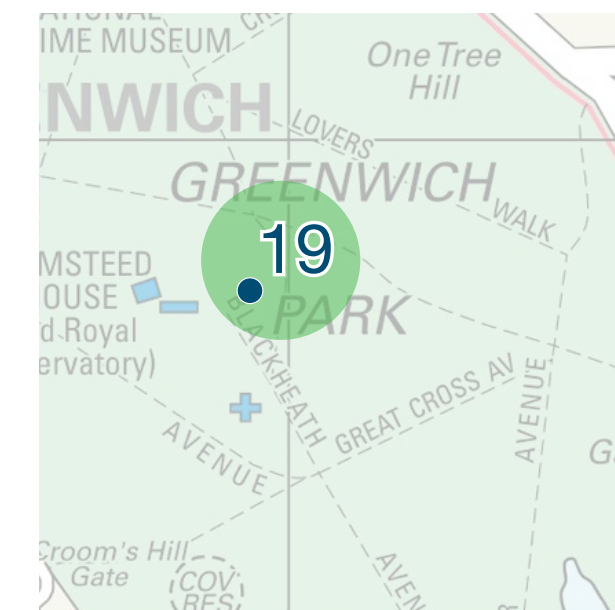
3 Conclusions

- 3.1 The proposed amendments to the Consented Scheme would be perceptible in local and middle-distance views surrounding the Site, and barely perceptible in long distance views such as LVMF 5A.2 from Greenwich Park. The proposed minor amendments to the height and scale of the Phase 1 plots and the proposed design refinements have been assessed to be appropriate and of a high-quality in regard to townscape, built heritage and visual effects.
- 3.2 The proposed amendments would not materially alter the assessment of the magnitude of impact or the significance of effects of the Consented Scheme, in isolation or cumulatively, on any townscape, built heritage and visual receptors set out in the December 2022 THVIA.

4 Verified Views



 - Updated views



View	Location	Page	Style	Render/Wireline	Verified	Ref	OS-E	OS-N	Height (AOD)	Heading	Lens	Field of View	Film	Date	Time
1	Crediton Hill	12	AVR1/3	Render/Wireline	Yes	D24899	525640.40	185193.58	68.18 M	171°	24mm	74°	Digital	23/08/20	14:37
2	Alvanley Gardens	15	AVR1/3	Render/Wireline	Yes	D17731	525707.04	185281.90	70.53 M	155°	24mm	74°	Digital	27/11/18	12:21
3	Frognal Lane, opposite Langland Gardens	18	AVR1/3	Render/Wireline	Yes	D18323	525965.03	185473.82	88.34 M	183°	24mm	74°	Digital	23/08/20	15:44
7	Nutley Terrace, at the junction with Maresfield Gardens	21	AVR1	Wireline	Yes	D23062	526436.74	184944.64	72.37 M	250°	24mm	74°	Digital	23/08/20	11:22
11	Broadhurst Gardens, near the junction with Canfield Gardens	24	AVR1/3	Render/Wireline	Yes	D17739	526208.65	184651.19	49.41 M	319°	24mm	74°	Digital	27/11/18	11:19
12	Broadhurst Gardens, opposite the playground	27	AVR1/3	Render/Wireline	Yes	D17740	526120.63	184670.45	47.23 M	315°	24mm	74°	Digital	27/11/18	11:24
13	Finchley Road Station platform	30	AVR1	Wireline	Yes	D18334	526182.88	184741.97	49.75 M	280°	24mm	74°	Digital	06/03/19	12:25
14	Junction of Fairhazel Gardens and Goldhurst Terrace	33	AVR1/3	Render/Wireline	Yes	D17746	526125.63	184352.39	41.11 M	348°	24mm	74°	Digital	27/11/18	12:55
15	Fairhazel Gardens	36	AVR1/3	Render/Wireline	Yes	D17742	525960.21	184551.95	44.96 M	330°	24mm	74°	Digital	27/11/18	11:33
16	West Hampstead Station platform	39	AVR1	Wireline	Yes	D18333	525606.68	184656.97	51.68 M	63°	24mm	74°	Digital	06/03/19	12:31
18	West End lane bridge	42	AVR1/3	Render/Wireline	Yes	D17745	525520.75	184834.31	55.56 M	108°	24mm	74°	Digital	27/11/18	11:54
19	LVMF 5A.2 Greenwich Park: the General Wolfe statue – north-east of the statue	45	AVR1	Wireline	Yes	D24229x200	538936.10	177334.50	47.20 M	299°	200mm	10°	Digital	27/03/21	09:37
A4	Frognal Rise/ Frognal	49	AVR1	Wireline	No	D18320	526184.67	185993.07	118.49 M	196°	24mm	74°	Digital	06/03/19	14:49
A5	Langland Gardens	52	AVR1	Wireline	No	D18324	525953.08	185384.21	79.98 M	171°	24mm	74°	Digital	06/03/19	15:37
A9	Priory Road / Abbot's Place	55	AVR1	Wireline	No	D23056	525612.43	183950.27	38.73 M	17°	24mm	74°	Digital	01/03/21	13:23
A13	Sumatra Road / Pandora Road	58	AVR1	Wireline	No	D23059	525178.69	184920.26	49.32 M	108°	24mm	74°	Digital	23/08/20	14:21
A14	Lymington Road / Crediton Hill	61	AVR1	Wireline	No	D18325	525652.28	184927.97	55.09 M	108°	24mm	74°	Digital	06/03/19	14:02
A15	Alvanley Gardens – South	64	AVR1	Wireline	No	D17733	525867.93	185125.18	58.77 M	161°	24mm	74°	Digital	27/11/18	12:14

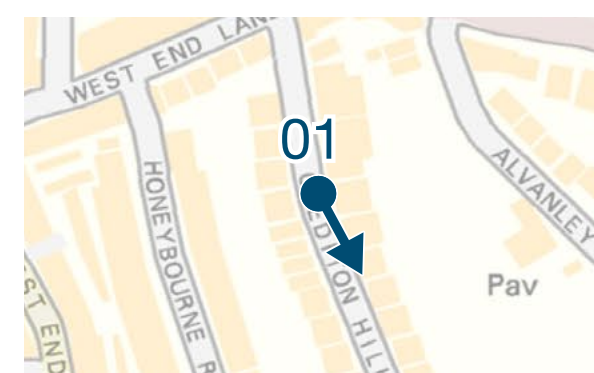
View 1 Crediton Hill

D24899 / 24mm / 23/08/20 / 14:37

Existing



View location



24mm – 36.9°

35mm – 27.2°

50mm – 19.8°

Image scaling factor = 37% at A3, 105% at A0

50mm – 19.8°

35mm – 27.2°

24mm – 36.9°

View 1 Crediton Hill

D24899 / 24mm / 23/08/20 / 14:37

Proposed



24mm – 36.9° 35mm – 27.2° 50mm – 19.8° Image scaling factor = 37% at A3, 105% at A0 50mm – 19.8° 35mm – 27.2° 24mm – 36.9°

View 1 Crediton Hill

D24899 / 24mm / 23/08/20 / 14:37

Cumulative



24mm – 36.9° 35mm – 27.2° 50mm – 19.8° Image scaling factor = 37% at A3, 105% at A0 50mm – 19.8° 35mm – 27.2° 24mm – 36.9°