

From: Raphael Iruzun Martins

Sent: 17 March 2025 17:37

To: Planning

Cc: Nina de Ayala Parker (Councillor) ; Tommy Gale (Cllr); Izzy Lenga (Cllr)

Subject: 2025/0484/P Objection

Dear Camden Planning,

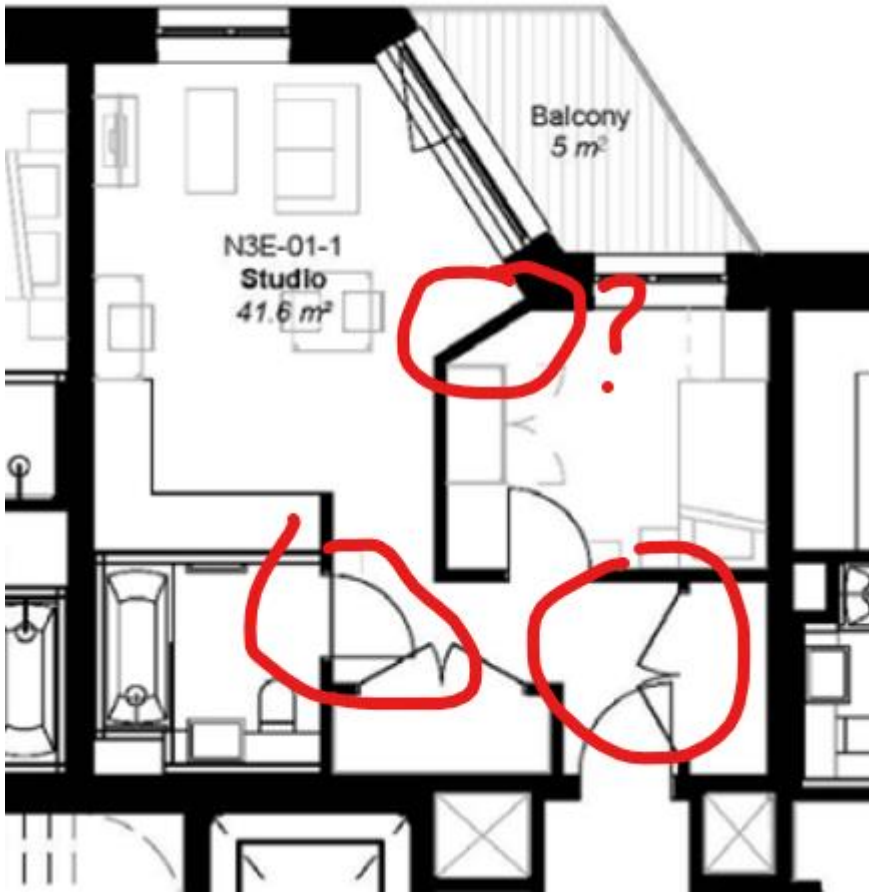
I am writing to object to the Section 73 Application for the O2 Centre Phase 1 Site for the following reasons:

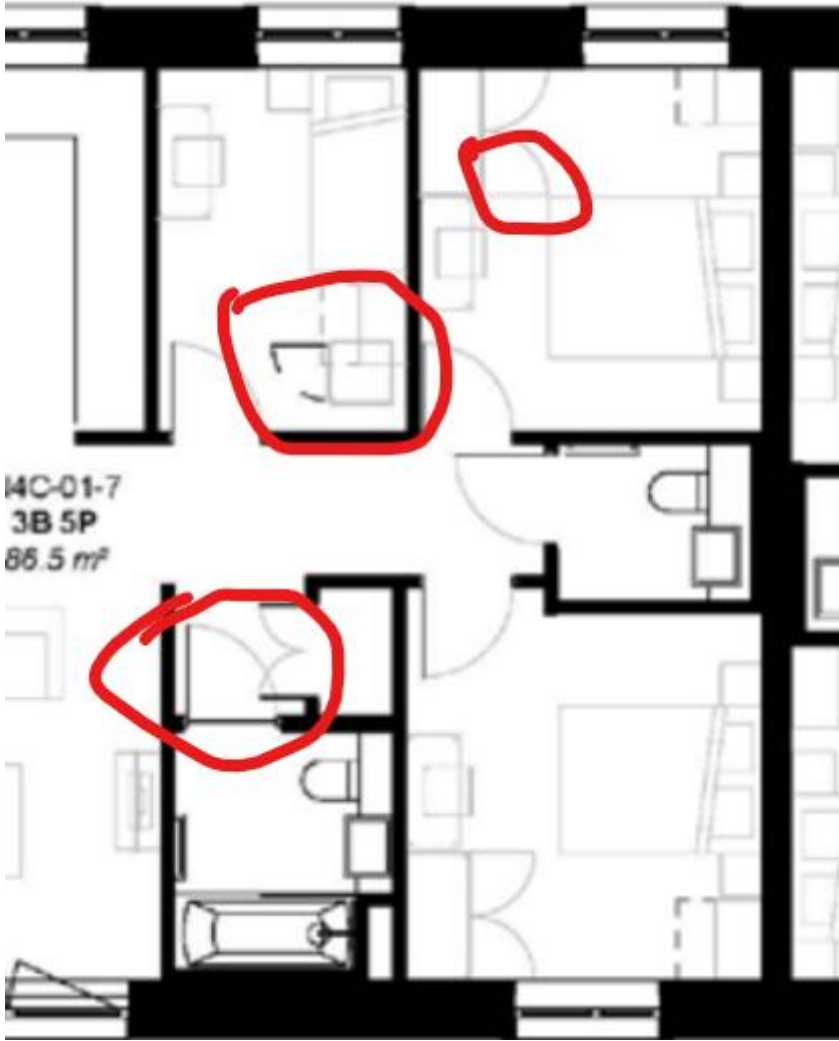
1. Town and Country Planning: Section 73 under the planning act exists to accommodate minor changes to planning applications where a project may have changed for various reasons. However, in this particular case, we have an entirely new building project and as such a new planning application is required. The building volumes are entirely different, the plans for flats are also completely different and the appearance has changed entirely. Should Camden Council approve this application, this will bring their planning department into great disrepute as well as potentially breaching the Town and Country Act exposing the council to potential legal challenges which would be an undesired cost for the council and taxpayer.

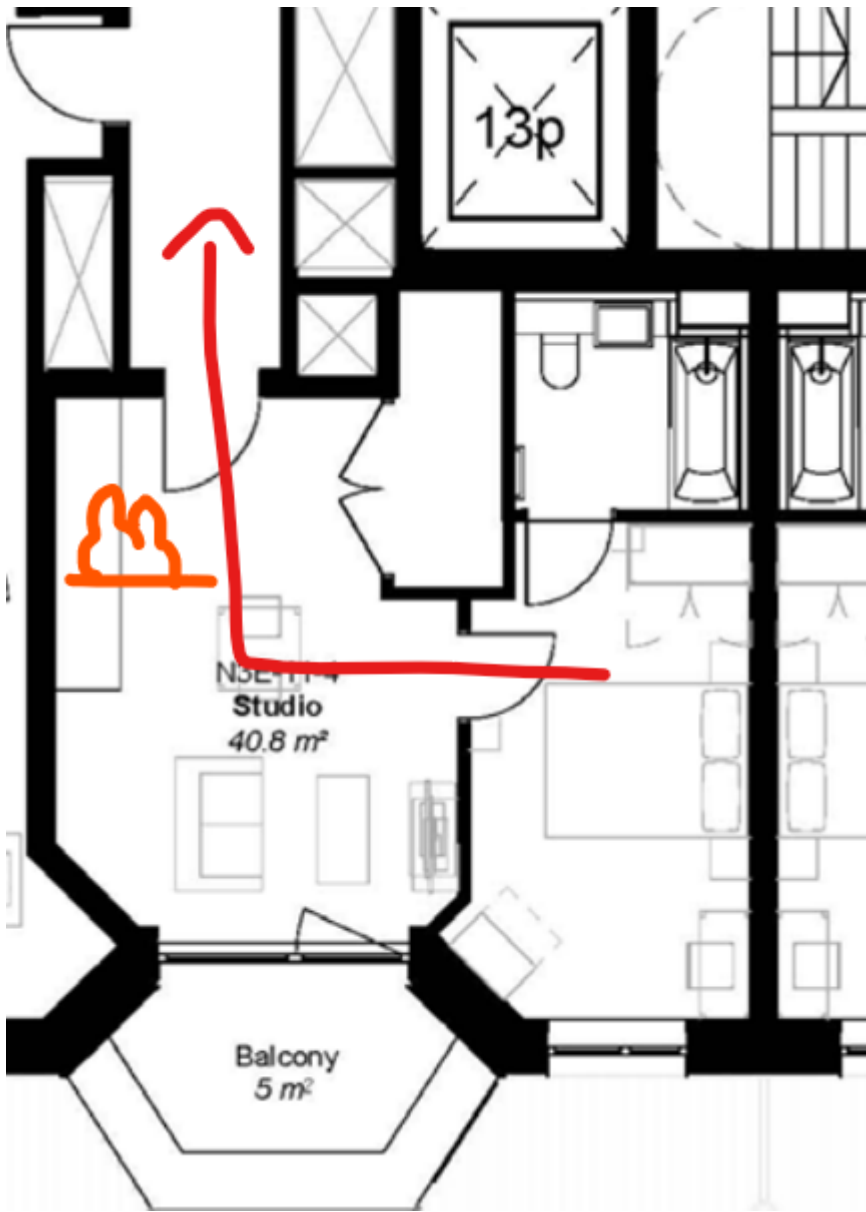
2. Heights: There are significant height changes to the buildings making them even taller. Tall buildings in general do not create communities as many tower modernist experiments throughout have taught us. It is possible to achieve good housing density without the need for so many stories. Camden council originally destined the site to have a much smaller number of homes via a referendum, around the 900 mark, the increase in number of homes is clearly a money making exercise at the expense of the entire surrounding communities. Therefore the developers should look to decrease the number of floors to be in line with the original camden council numbers. The building heights also has significant damage to the London skyline, from many points further north such as from Hampstead, West Hampstead and even Crickwood, significant views will be affected. The verified views also shows great damage to the skyline from Greenwich. The developer needs to understand the impact of the size of the development on the whole of London given its scale and reduce to be more appropriate.

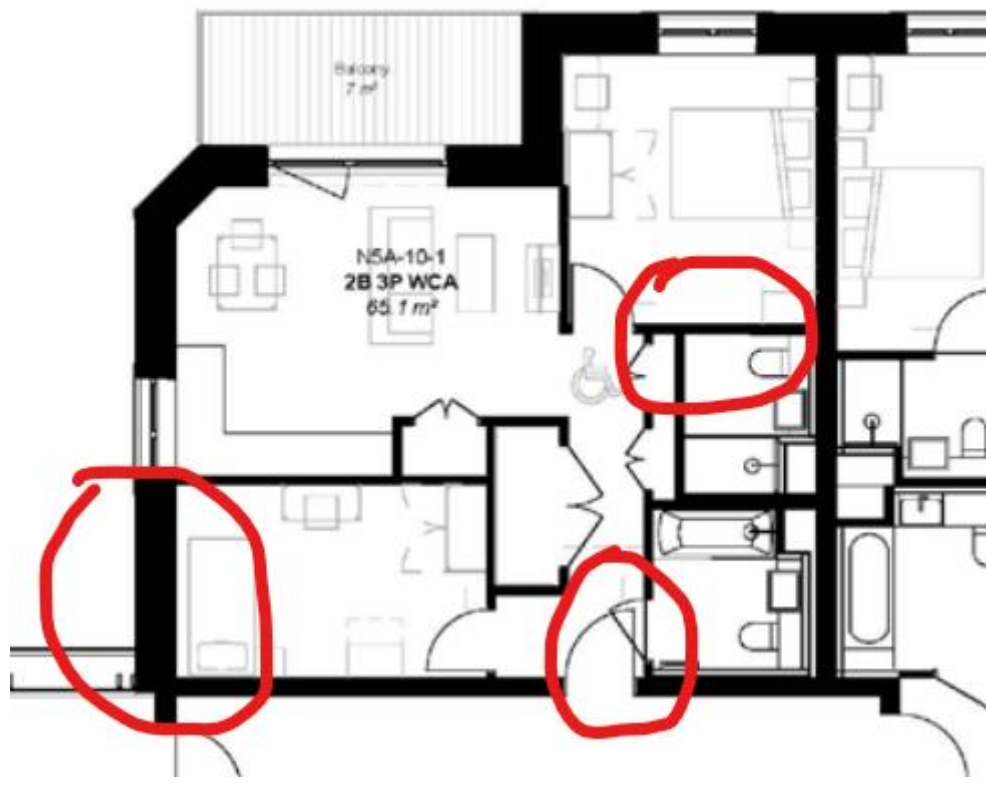
3. Safety and Quality: Tall buildings, even post Grenfell, are less safe than mid-rise communities. When observing the flat layouts, we can clearly see flats which are of poor quality with awkward layouts and have been rushed. Even on the plans there are a number of mistakes including door swings which clash into each other, floating furniture, and in flat N5A-10-1 a toilet with no door in an accessible flat and a second room with no window as shown on the diagrams below. Some of the studio flats, as I mentioned in the last planning application still have kitchens located by the exit of the flat. Given kitchens are the location where a fire is most likely to break out (as was the case with Grenfell due to an exploding fridge) an individual in that flat may be trapped and could die. Building control would be negligent to let this go through, as

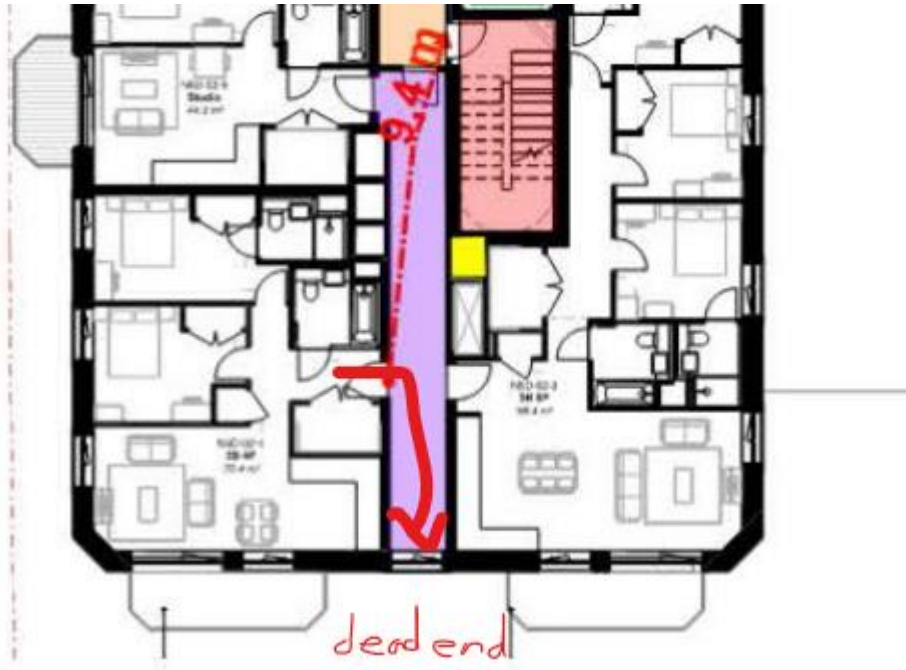
would the planning department at Camden. In Block N5, you can also see the removal of a staircase by creating a very long corridor, this is potentially very dangerous as you reduce escape capacity as well as having stair capacity critical for firefighting as well. It is also important to note that most of the flats are single aspect which means you get little to no air circulation which raises the likelihood to condensation and mould formation potentially being hazardous for residents. Block N5 also has a long dead end corridor from flats which could also be fatal as people try to escape from a smoke filled environment. When you spot these mistakes and concerns in the plans, it is clear the project is of very low quality focused only on the profit return meaning such a proposal will create undesirable and potentially dangerous homes. This alone would merit the refusal of the planning application.













4. Housing Mix: This development does not get close to Camden Council's affordable housing mix. It is only 35% by floor area and does not meet the Greater London Assembly requirements that the application shows the percentage of affordable housing by habitable rooms. The developer needs to increase the mix to at least 50% by floor area for this to begin to tackle the housing crisis of the area. If Camden really want to reduce their housing waiting list, this should be a fully social housing scheme. Therefore the delivery of these new homes is just a false promise of providing much needed housing.

5. Green Space: This project does not meet Camden Council's own requirements of 9sqm per occupier, even if the project increases the green space in relation to its predecessor, this is only

an increase in 300sqm, a minor change. The proposal needs to attend to Camden Council's green space requirements and therefore should be increased. As also mentioned in the previous proposal, the 'linear park' is in fact just a corridor which happens to have trees, the visuals of course make this look more dramatic than the reality will be. In order to achieve what is being shown, mature trees will need to be brought in, is the developer really aiming to spend the money to ensure that from day 1 we have a fully grown green space? Linear corridors are not desirable spaces to be, especially as it all faces a busy underground railway line adjoining it meaning tree cover have to be limited as per TfL and Network Rail standards due to leaves on the line in autumn and potential tree fall in extreme events.

6. Community Centre: The community centre as a standalone building may well have been a positive idea to make it seem like a proper proposal, however, what it proposes falls very short of what a community centre should propose to the area with a number of potential issues. The first is the lack of sufficient toilets, looks like there is heavy underprovision for the occupation of the building, also if under 18s are using the space, gendered toilets are preferred as they are better for child safeguarding. The second is the lack of storage space, just one small room on the upper floor, since many of the spaces are multi-use this will severely limit how the community centre functions and what they can offer. The stairs, which is also the fire escape of the building is on the far right corner meaning people evacuation from the top floor have a very long travel distance to the stairs themselves, which would put users in danger should a fire break out in the building. I also do not understand why the upstairs kitchen could not function separately from the multi-use space allowing, for example, for cooking classes to occur at the same time as a yoga session in the different rooms. Accessing one through the other is simply bad practice and lazy building design (as it also means deliveries of food might need to go through the space during an event. Also, why could more of the podium space not be given over to the community centre as a safe play area? The final point is actually how far away the location of the community centre is to surrounding communities. If you are coming from the north or south of the site (as most people do) you need to go around the railway lines and then walk towards the centre of the site, a very long walk. This will reduce the attractiveness of this space being used properly as a community space. North south connections on the site should really be considered as bridges over the railways for proper integration of the development to the area.

7. Temporary Condition: Why are there no visuals of how the space will look once Phase 1 is finished and the next phases have not started yet? Will we really end up with a couple of towers in the middle of a car park for so many years before other phases have not begun yet? This would be an awful place to live should that be the case and little/no consideration has been given as to what that looks like at all.

8. Public Transport Capacity and Upgrade: The £10m being promised to upgrade West Hampstead station is NOT a significant contribution as it covers a small fraction of the actual cost to upgrade the station to provide greater capacity and step-free access. For this you need additional ticket barriers, complicated step free access and the appropriate circulation space for the significantly increased projected demand. Finchley Road Station (arguable where most

people would go from this development as it is one less stop to Central London on the Jubilee and has Met line platforms as well) will receive no contribution or upgrade. That station is already overcrowded on many mornings with ticket barriers often closing to control crowd numbers on the platform below. Has the pedestrian modelling been conducted for BOTH stations on the impact and how will the additional capacity be provided? This can not only be done through the provision on step free access but new concourse space and potentially greater train frequency. One solution that needs to be reviewed is whether the construction of platforms for the chiltern railway could be provided at Finchley Road or West Hampstead to provide greater train capacity and free up space on the existing lines? When adding thousands of people to the community, these are the projects which need to be fully funded by developers if they take the local area seriously.

To conclude, what we see here is a cynical approach to increase profit margins for the developer at the expense of the community delivering few benefits to the area. This development is not just a private housing project, it is a significant piece of City and needs to be treated as such. When we see comparisons in the Design Access Statement to other parts of London such as Kings Cross and so on, the main difference is that those areas were treated as new pieces of city not a competition to cram as many buildings as possible. The housing mix here also would not do anything to help the housing crises of London and so the project as it stands cannot be treated as a serious housing proposal. Finally by changing the project team what we see is clearly that these changes are not about the changes to regulations (as they came into effect in 2022) but a Value Engineering approach, also via a change of architects, cramming more flats and decreasing the overall quality of the proposal with bland, empty and ugly facades and even straightening the chamfered edges from the original curves edges proposed. A lot of the 'Heatherwick' motifs which are pretty insignificant have been cut back from the consultation sessions held last year in the O2 Centre including the patterns to the base of the balconies to be seen from street level.

For all of the reasons above, I urge the council to respect the community views and hold the developer to account by rejecting this application and taking them back to the drawing board to create a proper piece of city.

Regards,

Raphael

Architect and Local Resident

Raphael Iruzun Martins