



GERALDEVE

Town Planning Statement

The O2 Masterplan Site, Finchley Road

On behalf of: LS (Finchley Road) Limited

Date: January 2022

LJW/LOLIVA/LDA/HBR/U0011576

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1 Executive Summary

- 1.1 This Town Planning Statement (“the Statement”) has been prepared by Gerald Eve LLP on behalf of LS (Finchley Road) Limited (the “Applicant”), to support an application made in part detail and in part outline (the “Application”) for the demolition and redevelopment of land encompassing the O2 Centre and associated car park, Homebase store, car showrooms and a Builder’s Merchant (the “Site”) within the London Borough of Camden (“LBC”).
- 1.2 The Site has been subdivided into 10 Development Plots. Development Plots N3-E, N4 and N5 and the associated landscaping, access roads and infrastructure form the detailed element of the Application which extends to 2.1ha and these proposals are referred to as the “Detailed Proposals”.
- 1.3 The remainder of the Application (comprising Development Plots N1, N2, N3, N6, N7, S1 and S8) is submitted in outline and these proposals are referred to as the “Outline Proposals”. Parameter Plans, Design codes and Development Specification document would be tied to the planning permission by condition and reserved matters would be required to comply with those parameter plans, design codes and development specification.
- 1.4 This Statement provides a comprehensive review and analysis of national, regional, local and neighbourhood planning policy and guidance which applies to the Proposed Development. It sets out the planning case for the scheme, having full regard to Development Plan policies and other material considerations and should be read in conjunction with the other supporting documents submitted in support of the Application.
- 1.5 The Applicant’s Vision is to create a place that integrates and connects the communities of Finchley Road and West Hampstead. A new neighbourhood that reflects LBC’s unique culture and provides something for everyone – a mix of homes where people can stay and grow, jobs and local opportunities; shops, restaurants, leisure and community facilities; and new green public spaces to relax with friends and family.
- 1.6 Despite being in a highly accessible location in proximity to five rail stations, two Underground, two Overground and a National Rail Station, the Site currently comprises

very low-density development in the form of a major surface level 520 space car park and mostly single or two storey buildings apart from the O2 Centre itself. As such, the Site is greatly underutilised and has the potential to make a much stronger contribution to meeting the Borough's housing, economic and other needs.

- 1.7 The Site currently contains the O2 Centre, a Homebase store, a Builder's Merchants, two car showrooms and a large 520 space surface level commercial car park. The Site is surrounded by roads or railway lines and provides little in the way of east - west permeability between Finchley Road and West End Lane. It presently impedes the connection of the surrounding communities.
- 1.8 The comprehensive redevelopment of the Site provides an opportunity to significantly open up an area of poorly accessible land, largely dominated by a sea of car parking, to the wider community, providing a clear, direct and high-quality east-west pedestrian and cycle friendly link between West Hampstead and Finchley Road. A considerable quantum of public realm is provided within the Proposed Development, equating to over 50% of the Site. This includes green spaces, landscaped spaces, play spaces and recreational facilities for children and people of all ages including a MUGA; it is designed as a place for everyone.
- 1.9 LBC recognises the strategic nature of the Site, designating the area which the Site sits within as a "Growth Area" (requiring development to contribute to a mix of uses, including substantial new housing (including affordable housing), town centre, employment and community uses, and green/open) and adopting a site-specific SPD (West End Lane to Finchley Road, 2021) setting out the site-specific aspirations for the redevelopment of this Site.
- 1.10 The Site is an outstanding mixed-use regeneration opportunity of Borough and London wide significance by virtue of its size, strategic and sustainable location, and the ability for comprehensive development to provide considerable placemaking and other significant public benefits that would not otherwise be possible¹.

¹ See section 7 of this of this Statement and the Design and Access Statement that provides the iterative design process and analysis of benefits

1.11 LBC sets out its vision for the borough in its Camden 2025 Vision which includes a series of ‘call to action’ points that it seeks to deliver over the next 5 years. These include:

- i. Everyone in Camden should have a place they call home;
- ii. Growth in Camden should be strong and inclusive – everyone should be able to access the work that is right for them;
- iii. Camden should be safe, strong and open, and everyone should be able to contribute to their community;
- iv. Camden should be a clean, vibrant and sustainable place; and
- v. Everyone in Camden should be able to live a healthy, independent life.

1.12 The proposals align with Camden’s aspirations for Site. In particular the development aids in working towards the Council’s vision for the Borough by 2025 by:

i. Providing a place for people within Camden to call home and access to the work that is right for them. The Proposed Development would:

- a. Deliver a mixed- use development in a sustainable and highly accessible location providing new homes (the Applicant is anticipating that the homes would be Build to Rent (‘BTR’)). It would deliver around 1,800 new, high-quality, homes for BTR² including genuinely affordable homes (35% of all homes would be affordable by floorspace split 60:40 Low-Cost Rent: Intermediate Rent);
- b. Provide over 19,500 sqm of non-residential floorspace, including flexible affordable workspaces, retail, food and drink, leisure, office and maker spaces providing a broad range of employment opportunities;
- c. Generate an average of 300 FTE construction jobs over the c. 15-year construction period. This equates to 4,560 person years’ worth of labour
- d. Deliver up to c. 760 FTE jobs in the completed development;
- e. Generate over an estimated £29 million in household spending in the local economy – benefiting local businesses and their employees;

² Equating to 17% of LBC’s 10-year housing target and circa 10% of LBC’s current affordable housing waiting list

ii. Creating a safe, strong and open place where everyone can contribute to their community. The Proposed Development would:

- a. Transform the existing Site by delivering a mix of residential, town centre, leisure, food and drink and workspaces that deliver a vibrant and animated new community in turn supporting the success of existing town centres to the east (Finchley Road) and west (West Hampstead);
- b. Deliver, through comprehensive development, a seamless east west link through the Site that is green and has intrinsic value that meets the three pillars of sustainability³;
- c. Create well- connected and accessible services to deliver social value by ensuring the people are able to make the most efficient and safe use of the built environment;
- d. Level access throughout the Site so everyone can benefit from the services, business, homes;
- e. Provide training, apprenticeship and skills initiatives, particularly to local people;
- f. Diverse employment uses including for independent businesses;
- g. Provide new services supporting the community: significant community facilities including a multidisciplinary health centre, community centre and creche;
- h. Improved transport accessibility by sustainable means including cycling and walking;
- i. Free wifi across the site, open to all, supporting easy and efficient public use of the Proposed Development;

iii. Creating a clean and vibrant sustainable place. The Proposed Development would:

- a. Provide design features within the open space for public activities;

³ The east-west link will aid: **the environment** by significant greening, aiding biodiversity and providing a seamless link for walking and cycling to promote sustainable forms of transport in the wider area; **Social integration and equality** by linking neighbourhood and communities; **Economic** joining two town centres to help promote the local high street and improve linked trips. –.

- b. Offer Play spaces for all ages and a new Multi-Use Games Area (MUGA); and
- c. Incorporate a public art strategy and public event programme secured through an Estate Management Plan;
- d. Achieve a 50% reduction in existing proven discharge rates and runoff volumes, reduced by 450m³ through measures such as 44% permeable open space to aid climate resilience to flooding by necessary and appropriate mitigation.

iv. Creating a place where everyone can live a healthy and independent life. The

Proposed Development would:

- a. Reduce car borne trips and increase sustainable transport modes;
- b. Provide health services if required;
- c. Provide community gardens;
- d. Provide growing spaces for resident groups and associations; and
- e. Provide a green neighbourhood with over 50% of the Site (3.14ha) as public realm to be accessible for all⁴;
- f. Increase biodiversity net gain by 165.43% helping to improve local air quality and wellbeing; and
- g. Reduce operational carbon emissions onsite and passive design and energy efficiency measures to provide a built environment that looks to sustainable futures.

1.13 The comprehensive benefits that flow from the Proposed Development are set out within the accompanying Social Value Framework and Regeneration and Town Centre Reports and chapter 18 of this Statement.

1.14 The Applicant is committed to delivering exemplary placemaking at the Site and a strong and vibrant new neighbourhood offering homes for people at all stages of their lives. The design of the Proposed Development builds on the character of the area, creating a

⁴ Provide a phased delivery of public realm and open space to support linkages with the wider area

genuinely new mixed-use neighbourhood that knits together the well-established, and distinct communities that surround it.

- 1.15 The O2 Centre, like all shopping centres from 1990s, was designed to be inward-looking. It provides little activation and animation at the ground floor plane and whilst providing a large quantum of floorspace, it is inefficient and does not meet current market needs. The current occupiers are dominated by a handful of larger multiples. The Centre has seen the failure of a number of tenants in recent years, leaving a considerable number of voids⁵. The Proposed Development, therefore, looks to demolish all buildings on Site and re-provide key uses in a modern and fit for purpose town centre arrangement. Materials would be re-used wherever possible, and new buildings are designed flexibly and sustainably with materials that are demountable and which can be reused/recycled in line with whole-life carbon and circular economy principles. Sustainability lies at the core of the Proposed Development.
- 1.16 Whilst the Proposed Development would lead to a reduction in town centre uses in terms of floorspace, the proposals retain the existing levels of employment generated at the Site by providing an appropriate quantum and sustainable balance of flexible town centre uses to reflect current and future market trends. The commercial and community uses would activate and animate the ground floor plane. The mix between residential, commercial and community uses has been developed to ensure that this would be a new place where people feel safe, secure and included during the day and night.
- 1.17 The development potential of the Site in terms of land use, layout, public realm and height, bulk and mass has been forensically considered. A comprehensive townscape analysis, undertaken by Tavernor Consultancy, has informed the massing and design of the Proposed Development to ensure that it relates to its surroundings and respects the nearby heritage assets whilst creating a series of new high-quality buildings in this prominent, sustainable, central London location.

⁵ 17% which is above average – See supporting Town Centre and Regeneration Report

1.18 The Applicant has aligned the Proposed Development with the National Design Guide⁶. The highest standards of environmental design have been incorporated in terms of carbon savings, urban greening and biodiversity net gain, whole-life carbon, and circular economy principles. The Proposed Development is car-free except for blue badge parking and provides extensive cycle parking; delivering a truly sustainable scheme in line with planning policy at all levels.

1.19 The comprehensive master planning approach allows for the Proposed Development to provide the key benefits, objectives and vision envisaged in LBC's West End Lane to Finchley Road SPD (2021). The Proposed Development would create:

i.A New Place that:

- a. Through excellent design and architecture establishes a new neighbourhood with its own qualities and identities;
- b. Delivers a comprehensive and joined up approach so as to ensure that the delivery of tangible benefits to the wider area can be realised⁷;
- c. Is diverse, welcoming, inclusive and accessible to all and not a gated community;
- d. Has a new residential neighbourhood at its heart which is diverse in terms of design, uses, activities and positively responds to and integrates the different characters, scale and nature of the adjoining areas and town centres;
- e. Is connected to existing neighbourhoods through an attractive east-west route through the Site from Finchley Road to West End Lane;
- f. Contributes to the West End Lane and Finchley Road district centres, appreciating that both district centres have different functions, characters and choice of shops and services through increased linked trips and better connectivity between the centres⁸;

⁶ See Section 11 of this Statement

⁷ See Section 18 of this Statement

⁸ See accompanying Town Centre Regeneration Report by Quod (January 2022)

- g. Takes the opportunity to create and integrate existing and new retail, leisure and community uses successfully within the Proposed Development and existing local neighbourhood and town centres;
- h. Provides new uses that complement, support and add to the vitality, vibrancy and diversity of the existing town centres;
- i. Would proffer a new residential and working population; creating a new customer base and wider catchment supporting each town centre and enabling seamless level access from, and to, the centre so more people can be attracted to shop locally in the independent businesses; and
- j. Secures 'new front doors' through creating the high-quality pedestrian route linking West End Lane and Finchley Road.

ii.A different Place that would:

- a. Be an attractive and welcoming place off West End Lane;
- b. In addition to the generous 24hr, open green and well overlooked east west link, provide secondary routes through the neighbourhood that are engaging, enjoyable and safe experiences;
- c. Provide better access to public transport networks through the provision of the new east west route and improving wayfinding in the public realm;
- d. Safeguard land for improved station upgrades including opportunities for step free access;
- e. Include cycle routes for everyone including families and those wishing to get from A-B;
- f. Incorporate a new bus turn around that is integrated within the public realm; and
- g. Reduce cars and servicing on Site and remove the unattractive car parking.

iii.A mix of spaces that:

- a. Are accessible and inclusive in a range of sizes, form and functions including a large public green space;
- b. Have been developed and tailored through an iterative consultation and design process;

- c. Includes different types of space for young people of different age groups – front toddlers to teenagers;
- d. Offers additional spaces and greening for new homes and other uses (including gardens, courtyards, terraces, balconies and green roofs);
- e. Encourages community cohesion such as spaces for growing;
- f. Strengthens biodiversity and corridors for flora and fauna including tree planning and green walls; and
- g. Are of high-quality and take into account user experience such as microclimate.

iv.A sustainable and resilient place that would:

- a. Incorporate ambitious and innovative environmental and energy strategies, that is reliant to the challenges of climate change;
- b. Take into account measures to tackle the source of air pollution and improve air quality;
- c. Incorporate green infrastructure networks including sustainable drainage measures;
- d. Maximise renewable energy generation on Site;
- e. Contribute further to circular economy principles including the creation of a more liveable “15 minute” place;
- f. Support the uses and social infrastructure where communities can access and take part in a sharing economy such a food growing; and
- g. Design homes and workplaces to be adaptable and support changing living and work patterns.

1.20 The masterplan has given careful consideration to a range of relevant planning matters including, but not limited to, design and townscape, landscaping, public realm and open space, heritage, archaeology, views, other transport impacts including on rail, buses and local pedestrian and cycle walkways, energy and sustainability, ground contamination, services and utilities, flooding, noise and vibration, air quality, biodiversity and ecology, daylight/sunlight, and wind microclimate.

1.21 The Proposed Development has evolved during an extensive two-and-a-half-year period of pre-application discussion and the submission of this Application follows detailed

consultation with LBC planning, design, conservation, inclusive economy, highways and public realm officers as well as statutory bodies including the GLA, TfL and Historic England.

- 1.22 In addition to this, a comprehensive programme of engagement with the local community has taken place as set out in this Town Planning Statement (Section 6), the Design and Access Statement ('DAS') and the Statement of Community Involvement ('SCI') submitted with this Application. The Applicant is committed to continuing its engagement with local residents and businesses and stakeholders during the determination period and the construction and operational phases.
- 1.23 The Site is allocated for considerable residential development⁹ and constitutes a highly accessible brownfield site that is immediately available to deliver a range of much needed housing, including affordable housing. The Applicant can deliver, without delay, this high-quality sustainable development which accords with the aspirations and sustainable growth envisaged in this location.
- 1.24 An Environmental Statement ('ES'), prepared by Plowman Craven has been submitted with the Application, along with a suite of other documents which assess the acceptability of the Proposed Development.
- 1.25 This Town Planning Statement concludes that the Proposed Development accords with the key themes of the national planning policy objectives and guidance, strategic and local policy objectives, statutory tests and specific planning policy criteria. The Proposed Development complies with the Statutory Development Plan, and therefore planning permission should be granted, without delay. In any event the other, strong, material considerations discussed within this Statement also indicate that planning permission should be granted.

⁹ LBC Local Plan, Policy G1, LBC adopted Site Allocations Development Plan Document (2013) (Site 29:O2 Centre Car Park); draft Site Allocations Local Plan (SALP) Policy WH11 and WH12, The Fortune Green and West Hampstead Neighbourhood Plan (2015) (B8) and West End Lane to Finchley Road SPD (2021).

2 Introduction

- 2.1 This Town Planning Statement (the “Statement”) has been prepared by Gerald Eve LLP on behalf of LS (Finchley Road) Limited (the “Applicant”) in support of a hybrid application made in detail and in outline (the “Application”) for the demolition and redevelopment of the O2 Centre – Finchley Road and associated land to the rear (the “Proposed Development”). The Application site includes the O2 Centre, the O2 Centre car park, the Homebase store, car showrooms and Builder’s Merchant on Blackburn Road (the “Site”). The Site is located within the London Borough of Camden (“LBC”).
- 2.2 This Statement provides a comprehensive review of relevant national, regional and local planning policy in relation to the Proposed Development. It sets out the planning justification for the Proposed Development and contains a detailed assessment in relation to relevant Development Plan policies and other material planning considerations and the statutory duties in respect of the historic environment.
- 2.3 The Application is assessed in relation to planning policy, guidance and the statutory tests with which, for the reasons set out within this Statement, it complies when considered as a whole, whilst also delivering significant public benefits.

Development Description

- 2.4 The Application is for the following Proposed Development:

“Part full and part outline planning permission comprising the following:

Detailed planning permission for Development Plots N3-E, N4, and N5 including demolition of existing above ground structures and associated works, and for residential development (Class C3) and commercial, business and service (Class E) uses in Development Plot N3-E, residential development (Class C3) and local community (Class F2) and commercial, business and service (Class E) uses in Development Plot N4, and residential development (Use Class C3) and commercial, business and service uses (Class E) uses in Development Plot N5 together with all landscaping, public realm, cycle parking and disabled car parking, highway works and infrastructure within and associated with those Development Plots.

Outline planning permission for Development Plots N1, N2, N3, N6, N7, S1 and S8 including the demolition of all existing structures and redevelopment to include residential development (Class C3) commercial, business and service uses (Class E), 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.”

Form of Application

- 2.5 Section 5 of this Statement sets out the form, structure and phasing of the Application in full. In summary, the Application is what is sometimes called ‘a hybrid application’ . This means that part of the application is applied for in detail and part is applied for in outline.
- 2.6 The Site has been subdivided into 10 Plots (N1, N2, N3, N3-E, N4, N5, N6, N7, S1 and S8). These are identified on Parameter Plan. 19066_X_(02)_102. The 10 plots sit within three indicative phases as shown on Illustrative Plan no 19066_X_(00)_P008_. Phase 1 covers the Detailed Application and is located at the centre of the Site. Phase 2 (also referred to as Outline Phases West) and Phase 3 (also referred to as Outline Phases East) form the Outline Application.
- 2.7 A summary of the uses that would be delivered in each phase is set out below:

a. Phase 1 – The Detailed Application

- 55,180sq. m (GIA) of residential floorspace including an allowance for blue badge car parking, equating to 608 no of dwellings;
- 188 affordable homes, representing 35% by floorspace, split 60:40 Low-Cost Rent: Intermediate Rent;
- 1,733sq. m (GIA) of retail;
- 114sq. m (GIA) of food and drink;
- 155sq. m (GIA) of professional services;
- 270 sq m (GIA) of community centre; and

10,146sq.m (GIA) of Public Realm.

b. Phase 2 – Outline Proposals (Development Plots S8, N7 and N6)

- Up to 36,150sq.m (GIA) of residential floorspace including an allowance for blue badge car parking and basements;
- 35% affordable housing by floorspace;
- Up to 860sq. m (GIA) of retail;
- Up to 200sq.m (GIA) of food and drink;
- Up to 1,200sq.m (GIA) of medical services;
- Up to 300sq. m (GIA) of non residential creche/day centre or nursery;
- Up to 300sq. m (GIA) of office/workspace; and
- Up to 300sq. m (GIA) of drinking establishment.

c. Phase 3 – The Outline Application (Plots N3, N2, N1 and S1)

- Up to 78,850sq. m (GIA) of residential floorspace including an allowance for car parking and basements;
- 35% affordable housing by floorspace;
- Up to 4,600sq. m (GIA) of retail;
- Up to 800sq. m (GIA) of food and drink;
- Up to 500sq. m (GIA) of professional services;
- Up to 1,200sq. m (GIA) of indoor sports and recreation;
- Up to 500sq. m of (GIA) office/workspace;
- Up to 600sq. m of drinking establishment;
- Up to 3,050sq. m (GIA) of Cinema;
- Up to 3,000sq. m (GIA) of service yard.

Illustrative Masterplan

- 2.8 In order to demonstrate how the Outline Proposals could come forward as a fully designed scheme that accords with the parameters set out within the Outline Application Framework, an Illustrative Masterplan has been developed. This is just one interpretation of the Outline Application Framework. At the reserved matters stage, the scheme may be different, but it must conform to the parameters shown on the parameters plans. The Illustrative Masterplan also shows how the Outline Proposals could relate to the Detailed Proposals.

Consultation

- 2.9 The Application has been subject to detailed and comprehensive consultation with the local community, the London Borough of Camden (LBC), the Greater London Authority (GLA), Transport for London (TfL), Historic England and other interested parties such as the Wildlife Trust.
- 2.10 The Application proposals have evolved over the pre-application consultation period and have been revised to accommodate advice and comments received. The design process has been iterative, taking consultation and analysis from technical assessments into consideration¹⁰.
- 2.11 Further details are contained within Section 7 of this Town Planning Statement, the Design and Access Statement ('DAS') and the Statement of Community Involvement ('SCI') submitted within this Application.

Environmental Statement

- 2.12 The Proposed Development falls within the threshold set out in paragraph 10b of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the 'EIA Regulations'), as it involves an urban development project of more than 1 hectare and is not a dwellinghouse development. The Proposed Development is likely to give rise to significant environmental effects, and as such, is EIA development and subject to the EIA process.
- 2.13 In accordance with the Regulations an Environmental Statement has been formally scoped (under application ref. 2021/2770/P) and accompanies this Application.
- 2.14 The ES has considered the environmental consequences of the Proposed Development as it could be built within the constraints imposed by the Parameter Plans, Design Codes and principles set out in the Development Specification document. Given that the detailed

¹⁰ See Design and Access Statement

layout, height and massing of the Proposed Development could be configured in a different manner to that shown in the Illustrative Masterplan (but otherwise within the controls established), the ES has taken account of reasonable variations in the form of the built development and has assessed the likely significant effects of the scheme based on the Parameter Plans.

- 2.15 The Proposed Development is referable to the Mayor of London under Categories 1A and 1C of the Town and Country Planning (Mayor of London) (Amendment) Order 2011 as a development in London which comprises or includes the erection of a building with 150 residential units or more; and a development which comprises building(s) more than 30 metres high outside of the City of London.

Structure of the Town Planning Statement

- 2.16 The Statement is structured as follows:
- Section 3 – Site and Surroundings;
 - Section 4 – Planning History;
 - Section 5 – Proposed Development;
 - Section 6 – Application Structure;
 - Section 7 – Consultation and Community Engagement;
 - Section 8 – Planning Policy Context;
 - Section 8 to 16 – Planning Policy Assessments;
 - Section 17 – Planning Obligations and Community Infrastructure Levy;
 - Section 18 – Summary and Conclusions.

Content of the Application

- 2.17 This Town Planning Statement should be read in conjunction with the accompanying plans and drawings submitted, as well as the following documents which are also submitted in support of this Application (in addition to this Statement):
- Covering Letter, prepared by Gerald Eve;
 - Completed Planning Application forms and Certificate C, prepared by Gerald Eve;
 - Completed Community Infrastructure Levy form, prepared by Gerald Eve;

- Site Location Plan, prepared by AHMM;
- Existing and Proposed General Arrangement Plans, Sections and Elevations, prepared by AHMM;
- Demolition Plan, prepared by AHMM;
- Parameter Plans, prepared by AHMM;
- Design and Access Statement, including Public Realm Strategy and Landscaping Strategy, prepared by AHMM and East;
- Design Codes, prepared by AHMM;
- Development Specification Document, prepared by Gerald Eve and AHMM;
- Affordable Housing Statement, prepared by Quod;
- Healthy Streets Transport Assessment, prepared by Arup;
- Framework Travel Plan, prepared by Arup;
- Outline Construction Logistics Plan, prepared by Arup;
- Construction Management Plan Pro Forma, prepared by Mace;
- Regeneration and Town Centre Report, prepared by Quod;
- O2 Social Value Framework, prepared by Quod;
- Health Impact Assessment, prepared by Quod;
- Energy Strategy, prepared by Hoare Lea;
- Circular Economy Statement, prepared by Buro Happold;
- Sustainability Strategy, prepared by Buro Happold;
- Flood Risk Assessment, prepared by Pell Frischmann;
- Proposed Drainage Strategy, prepared by Pell Frischmann;
- Arboricultural Report, prepared by Pell Frischmann;
- Statement of Community Involvement, prepared by London Communications Agency and 2-3 Degrees;
- Fire Safety Statement, prepared by Hoare Lea;
- Fire Safety Gateway One Report, prepared by Hoare Lea;
- Air Quality Positive Statement, prepared by Hoare Lea;
- Basement Impact Assessment, prepared by Pell Frischmann;
- Waste Management Strategy, prepared by Arup;
- Employment, Skills and Supply Plan, prepared by Landsec;
- Utilities Statement, prepared by Hoare Lea; and
- Financial Viability Assessment prepared by Gerald Eve.

2.18 The Environmental Statement coordinated by Plowman Craven is made up of a Non - Technical Summary and the following Volume 1 chapters:

1. Introduction
2. Approach to the Assessment
3. Alternatives
4. The Proposed Development
5. Demolition and Construction
6. Noise and Vibration
7. Air Quality
8. Transport
9. Flood Risk and Drainage
10. Ground Conditions and Contamination
11. Archaeology
12. Daylight, Sunlight and Overshadowing
13. Wind Microclimate
14. Ecology
15. Socio-Economics
16. Climate Change
17. Cumulative Effects
18. Summary of Effects and Mitigation
19. Summary of Residual Effects

2.19 The Environmental Statement also contains the following Volumes:

- Volume 2 Townscape, Visual and Built Heritage Impact Assessment (TVHIA)
- Volume 3A Technical Appendices:
 - i. EIA Scoping Report
 - ii. EIA Scoping Opinion
 - iii. Arboricultural Survey and Impact Assessment
 - iv. Health Impact Assessment
 - v. Flood Risk Assessment (FRA), including Drainage Strategy
 - vi. Preliminary Ecological Assessment (PEA)
 - vii. Preliminary Risk Assessment (PRA)
 - viii. Historic Environment Assessment (HEA)

- Volume 3B Transport Assessment

3 Site and Surroundings

3.1 This section describes the Site's location and context in greater detail. The full extent of the Site is shown within the red line boundary of the Site Location Plan, submitted with this Application.

The Site

3.2 The Site is located on Finchley Road, within LBC. It is bounded by Blackburn Road, which envelopes much of the Site along its southern and northern edge, also extending to the west. Finchley Road (A41) bounds the Site to the east, with Billy Fury Way to the west. The Thameslink Bedford-Brighton railway line runs along the northern edge of the Site, and the London Underground Jubilee and Metropolitan lines run above ground along the southern edge of the Site.

3.3 The Site, as outlined in red in the image below, is approximately 5.7 ha and currently comprises the O2 Centre, which is arranged over three floors and contains a Vue cinema, a mix of retail units, restaurants and cafes, a health club, a community room, a Sainsbury's store; a surface level carpark with space for 520 vehicles(which also contains a car wash); a Homebase store; two purpose-built car showrooms; a Builder's Merchant; and Blackburn Road.



3.4 The O2 Centre fronting Finchley Road, currently contains the following occupiers:

Lower Ground Floor Level

- Sainsbury's Supermarket and Argos

Ground Floor Level

- Flying Tiger;
- Waterstones;
- Virgin Active private gym;
- Nando's;
- Paperchase;
- Oliver Bonas;
- BoConcept;
- Soho Coffee Co.; and
- My Tortellini.

First Floor Level

- Vue Cinema;
- The Little Gym;
- Wagamama; and
- Gymboree.

3.5 Currently the vacancy rate is circa 17%. This is in line with the evolving trend in shopping centres which are reporting between 15%-19.5% vacancies.¹¹ Retailers such as Habitat have moved out of the O2 Centre and Waterstones have indicated that the size of their existing unit is too large and does not reflect their current consolidation of retail. The consolidation and vacancy rates of indoor shopping centres is predicted to increase with demand for floorspace contracting.

¹¹ British Retail Consortium "Vacancy Rate Plateaus" 29th October 2021

- 3.6 Located in the west of the Site are car showrooms and a Builders Merchant. As set out in the land use assessment within this Statement, these uses represent an inefficient use land. They are not compatible with a high-quality residential development and also constrain the ability of the Site to deliver the range of public benefits sought by the Local Planning Authority.
- 3.7 There are no listed buildings on the Site and it is not located within a conservation area. However, there are five conservation areas, in the vicinity of the Site (South Hampstead, Fitzjohns Netherhall, Reddington Frogna, Belsize Park and West End Green), as well as a number of statutory and locally listed buildings. The Site is not located within an Archaeological Priority Area.
- 3.8 The Site is principally accessed from the east via the A41 Finchley Road. This forms a junction with Blackburn Road, which runs along the outside northern edge of the Site to the car showrooms, before routing southwards to create a road along the southern Site boundary which leads to the O2 Centre servicing yard. The Site can also be accessed from the west via West End Lane, which forms a junction with Blackburn Road. Blackburn Road leads eastwards towards the Homebase but does not create a vehicular connection with the eastern sections of Blackburn Road.
- 3.9 The Site can be accessed on foot from both the east and the west. From the east, pedestrian access is either via the north side of the O2 Centre along Blackburn Road or through the O2 Centre itself. From the west, pedestrian access is either via West End Lane along Blackburn Road or via Granny Dripping Steps leading to Billy Fury Way. There is a pedestrian route linked with Blackburn Road running along part of the southern edge of the Site (adjacent to the car showrooms) but it is inhospitable and uninviting. There are no links through the Site from north to south (and vice versa).
- 3.10 The Site sits between five stations Finchley Road underground, Finchley Road and Frogna overground, West Hampstead underground, West Hampstead overground and West Hampstead Thameslink stations. Two bus services (the 187 and 268) currently start / terminate and stand within the Site, anchored at the bus stop at the eastern end of Blackburn Road (O2 Centre Stop FC). These routes enter and exit the Site via the Blackburn Road / Finchley Road junction and use the western end of

Blackburn Road (adjacent to the car showrooms) as a turning area. A second stop is provided at the western end of Blackburn Road adjacent to the Homebase (O2 Centre Homebase Stop FB).

3.11 Due to the proximity of these Stations, and bus services, one would expect a high Public Transport Accessibility Level (PTAL) across the Site. However, due to the challenges with accessing parts of the Site (on foot, cycling or by vehicle) the PTAL varies considerably. TfL's WebCAT online database reports the Site as having a PTAL ranging from 2 to 6b, (on a scale of 0 to 6b with 0 being the lowest and 6b being the highest). In order to verify the WebCAT results, a manual PTAL assessment has been undertaken. The manual assessment shows that, when taking into account the true walking network available, the actual PTAL of the existing Site is 6a ('excellent'). There are a number of bus services operating locally on both Finchley Road and West End Lane. Bus services currently use the Site to turn around.

3.12 The floorspace contained within the existing buildings on the Site is set out in the table below:

Building	Total Floorspace (GIA sq m)	Total Floorspace (GEA Sq m)
O2 Centre (including Sainsbury's)	24,259	24,966
Homebase Store	4,084	4,206
Car Showrooms	4,356	4,487
Builder's Merchant	640	659
Car Wash	257	265

Table 3.1: Existing Buildings

3.13 The existing Site currently contains a significant amount of parking. The existing parking is summarised in Table 3.2 below.

	Area	Car Parking Spaces	Motorcycle Parking	Cycle Parking
O2 Centre & carpark area	4.32 ha	520	4	44
Car Showrooms	0.96 ha	110	0	0
Builder's Merchant	0.45ha	5	0	0
Total	5.73 ha	635	4	44

Table 3.2: Existing Parking Provision

3.14 In terms of planning policies, the whole of the Site, excluding the O2 Centre, is located within the West Hampstead Interchange Growth Area as identified within LBC's Local Plan.

3.15 A large proportion of the Site, which incorporates all of the O2 Centre, the car park and the Homebase store, is located within the Finchley Road / Swiss Cottage Town Centre, as designated in the Local Plan. The shops directly adjacent to Finchley Road tube station, along Finchley Road fall within a designated Primary Shopping Frontage, and where the O2 Centre frontage starts, this becomes a Secondary Retail Frontage which then extends down along Blackburn Road to the end of the O2 Centre and stops. The West Hampstead Town Centre is located to the west of the Site but does not contain any of the land within the red line Site boundary.

3.16 The Site is included in both LBC's adopted and emerging Site Allocation Documents as an allocated development site. Both documents identify the Site as being suitable

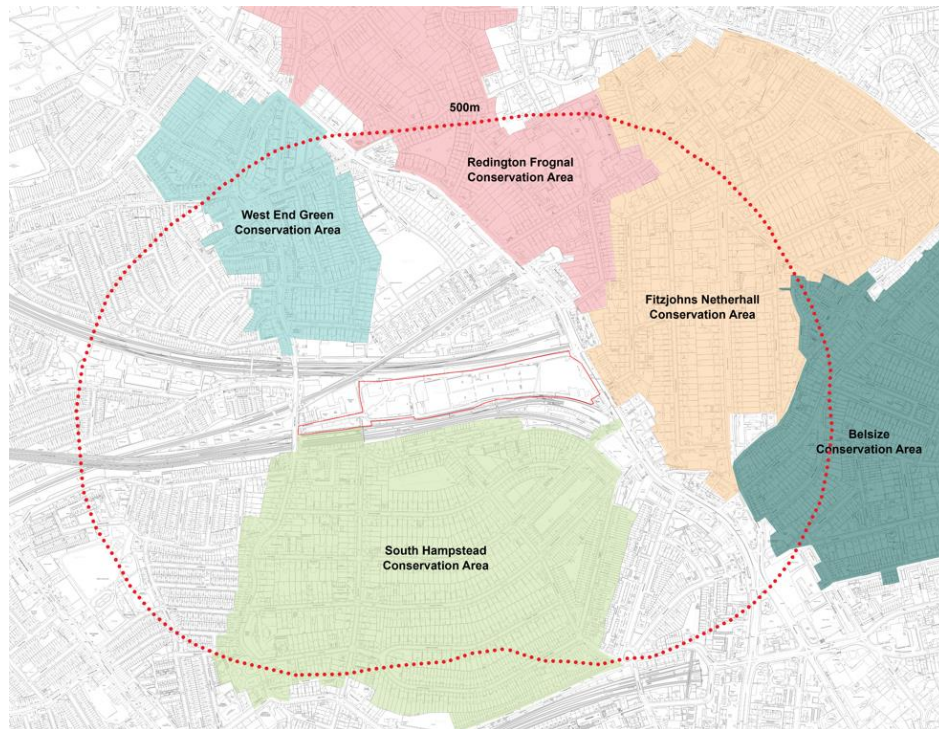
for town centre mixed use development including housing, retail, community uses and open space, with the emerging Site Allocation placing more of an emphasis on the provision of self-contained homes with an indicative capacity for 950 new homes. It is important to note that the adopted Site Allocation related only to the O2 Centre car park area (1.35ha). The emerging Site Allocation covers a wider area (4.5ha) including the O2 Centre (albeit noting that this may not come forward), the car park, the Homebase store and the car showrooms.

- 3.17 Guidance on the master planning principles to guide the future development of the Site is set out within the West End Lane to Finchley Road Supplementary Planning Document (SPD) which was adopted for the Site in September 2021. The SPD vision for the area is the comprehensive development and intensification of this insular, low density and poorly connected place to create a new mixed use residential neighbourhood that integrates seamlessly into the wider city.
- 3.18 The Site is also located within the Fortune Green and West Hampstead Neighbourhood Plan area and as such the Proposed Development has been assessed against these policies within this Town Planning Statement.
- 3.19 Further details on the planning policies and designations affecting the Site are set out in Section 8 – Planning Policy Context, of this Town Planning Statement.

The Surroundings

- 3.20 The area surrounding the Site contains a mixture of residential and commercial uses, with the commercial uses generally being located within the Town Centres of Finchley Road and West Hampstead.
- 3.21 With regards to the residential areas, the main architectural feature is the red brick Victorian and Edwardian terraces and mansion blocks. There are a number of listed buildings in the surrounding area as set out in the TVIHA. These include 104 Finchley Road, 106 Finchley Road, Fairfax Mansions 167-175 Finchley Road, 179-189 Finchley Road, St Johns Court Finchley Road, 227-239 Finchley Road, 289-315 and 164-200 Finchley Road, Freud Museum Garden 20 Maresfield Gardens. There are

five conservation areas in the vicinity of the Site as shown on the plan below (South Hampstead, Fitzjohns Netherhall, Reddington Froggnal, Belsize Park and West End Green).



3.22 There have also been a number of planning permissions in recent years, as the area grows and to reflect its designation as a Growth Area. These developments include the following:

- 187-199 West End Lane – a predominantly residential development for 198 residential units within buildings ranging between 5-12 storeys.
- Abbey Road – a predominantly residential development for up to 296 residential units within buildings ranging between 2-12 storeys.
- 100 Avenue Road – a predominantly residential development for 184 residential units within a 24-storey building.
- 1-33 Liddell Road – phase 2 of a mixed-use development, providing 106 residential units and mixed commercial uses within buildings ranging between 5-11 storeys.

- 156 West End Lane – a predominantly residential development providing 164 residential units in buildings ranging between 3-7 storeys.
- 317 Finchley Road – a predominantly residential development providing 22 residential units in a part 7, part 10 storey building.
- Land at Midland Crescent – a student housing development providing 60 student bedrooms and supporting flexible commercial space in a part 3, part 4, part 5 storey building.

3.23 These developments have evolved the character of the area in general and increased overall density.

4 Planning History

- 4.1 This section of the Town Planning Statement highlights the key planning history records relevant to the Site. The Site was comprehensively redeveloped in the mid-1990s. The principal planning permissions relevant to the Site are set out below. A full table of historic planning permissions is set out in Appendix A.

The Site

- 4.2 On 13 September 1996 (ref. 9501238R2) an application for planning permission was granted for:

“Redevelopment of land to the rear of 241-279 Finchley Road by the erection of a 3-storey development comprising a mix of retail, leisure and restaurant use and a Sainsbury's food store fronting Finchley Road, and by the erection of a non-food retail store to the rear, together with the formation of a new access road and traffic light-controlled junction with Finchley Road and the provision of a surface level car park for 561 cars”.

- 4.3 This planning permission relates to the existing O2 Centre and the Homebase store on the Site.
- 4.4 In the 1990s, two applications were submitted to LBC in relation to the land to the rear of the permitted Homebase store. On 8 May 1990, planning permission (ref. PW9802219) was granted for a free-standing glazed canopy to the rear of the Homebase store and on 14 January 1999, planning permission (ref. PW9802758) was granted for an amendment to the glazed canopy.
- 4.5 On 25 May 1999 planning permission (ref. PW9802413R2) was granted at the rear of 241-297 Finchley Road for the redevelopment of the site to provide two two-storey buildings for Volkswagen and Audi car dealerships. The development also includes a vehicular entrance to the access road onto Finchley Road which serves the O2 Centre.

- 4.6 On 15 May 2002 planning permission (ref. PWX0102110) was granted at the O2 Centre, Finchley Road for the erection of a carwash building and associated car bays and landscaping. The Site is located on the southwest corner of the car park adjoining the Homebase store.
- 4.7 On 8 May 2003 planning permission (application ref PWX0202103) was granted at 14 Blackburn Road for the **“Redevelopment of whole site by the erection of a 4 storey eastern block comprising two Class B8 and eight Class B1 units with associated service yard, together with a 4 storey plus basement western block comprising 8 dwelling houses and 6 self-contained flats with associated underground car parking”**. This planning permission relates to the Builders Merchant located to the west of the Site. The applicant discharged a number of conditions relating to this planning permission; retrospectively, however, it is understood that there have been no further developments on site since 2009 and it is unclear whether this planning permission was implemented or not.
- 4.8 Since the construction of the O2 Centre, a number of applications have been submitted to the Council for works to the O2 Centre. The applications include alterations to the internal layout and include the creation of mezzanine floors to accommodate further retail provision. Full details of the internal applications are set out within the planning history table at Appendix A.

Surroundings

- 4.9 We have also reviewed the planning history of the area surrounding the Site which should be given due consideration to ensure that the local context is understood.
- 4.10 At Former Mercedes Benz Garage, Blackburn Road, planning permission was granted at appeal (ref. APP/X5210/A/10/2127151) on 30 September 2010 for the **“erection of a part five, part seven, part nine storey plus basement building providing 2,110sqm of flexible B1 employment space at ground floor and 347 beds (39 cluster flats and 52 studios) of accommodation for students to upper floors (following demolition of existing car garage) at the former Mercedes Benz Garage, Blackburn Road, London, NW6 1AW”** (Appeal ref.

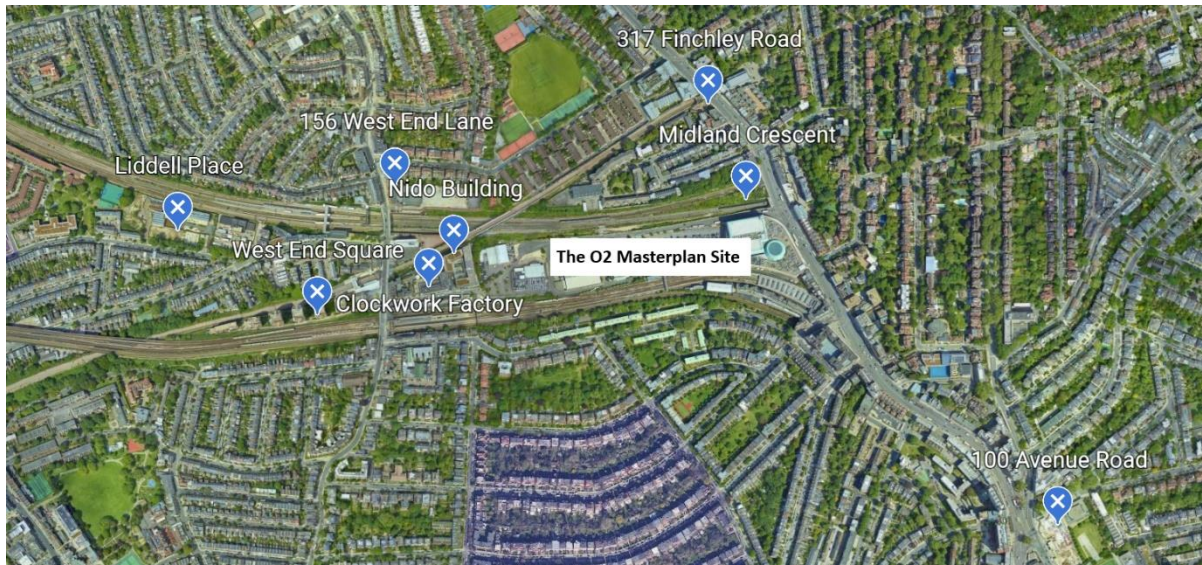
APP/X5210/A/10/2127151). The site is located to the west of the application Site and is known locally as the Nido building / Haywood House.

- 4.11 On 30 March 2012, planning permission (ref. 2011/6129/P) was granted at 187-199 West End Lane and amended on 15 July 2013 by planning permission (ref. 2013/1924/P) for the redevelopment of site to create seven new buildings between five and twelve storeys in height to provide to provide 198 residential units. This site is located to the west of the Site, bounding West Hampstead station to the west and the railway line to the south. This development is now largely complete. This building is known locally as West End Square.
- 4.12 On 12 July 2012 planning permission (ref. 2012/0096/P) was granted at Abbey Road for the following, ***“Outline application for phased redevelopment of site to provide up to 296 residential (Class C3) units (including up to 133 affordable units), up to 1,300 sqm of commercial floor space (Class A1-A5), up to 1,055sqm of business floorspace (Class B1), up to 2,500sqm community and health floorspace (Class D1) and associated space for parking, plant, servicing, ancillary storage and energy centre, all in five buildings as follows: Block C (up to 2 and 3 storey community and health uses), Blocks A, B, D and E (predominantly up to 6 and 7 storeys residential and commercial uses) and Block A (up to 6 to 12 storeys of residential and commercial uses); provision of open space and landscaping; alterations to existing highway layout and creation of new vehicular and pedestrian access routes; all following demolition of Belsize car park building, Abbey Coop Community Centre and Hinstock and Emminster blocks (including Belsize Priory Health centre, residential and commercial units), site-wide walkways and pedestrian railway bridge. Application provides detail for approval of layout and access only and not scale appearance or landscaping”***. The site is located to the south of the application Site. This development is known locally as the Abbey Area and is complete.
- 4.13 On 19 February 2016, planning permission (ref. 2014/1617/P) was granted at 100 Avenue Road for ***“Demolition of existing building and redevelopment for a 24 storey building and a part 7 part 5 storey building comprising a total of 184 residential units (Class C3) and up to 1,041sqm of flexible retail/financial or***

professional or cafe/restaurant floorspace (Classes A1/A2/A3) inclusive of part sui generis floorspace for potential new London Underground station access fronting Avenue Road and up to 1,350sqm for community use (class D1) with associated works including enlargement of existing basement level to contain disabled car parking spaces and cycle parking, landscaping and access improvements". The site lies to the southeast of the Application Site. The applicant has begun discharging conditions however it is understood that works on site have halted since mid-2020. This site has been the subject of a recent appeal against the refusal of LBC to allow the removal of affordable housing units within the development, the appeal was dismissed. The site is known locally as 100 Avenue Road.

- 4.14 At 1-33 Liddell Road planning permission was granted on 31 March 2015 (ref. 2014/7651/P) for **"Phase 2 of comprehensive, mixed-use redevelopment involving the construction of three new buildings: Block A (5 storeys) to provide 3,700 sqm (GIA) of mixed commercial use (Class B1), Block B (11 storeys) and Block C (5 storeys) to provide 106 mixed tenure residential units (Class C3) and associated public realm landscaping works"**. The site lies to the west of the application Site. The applicant is in the process of discharging conditions. The site is known locally as Liddell Place.
- 4.15 On 23 June 2017 planning permission (ref. 2015/6455/P) was granted at 156 West End Lane for **"Comprehensive redevelopment following demolition of all existing buildings to provide 164 self-contained residential dwellings (Class C3), 763sqm of flexible non-residential use (Class A-A3, D1, D2), 1093sqm of employment floorspace (Class B1) and 63sq.mof community meeting space (Class D1) in buildings ranging from 3 to 7 storeys. New vehicular access from West End Lane and provision of 08 accessible car parking spaces. Provision of new public open space and widening of Potteries Path and associated cycle parking and landscaping"**. The site lies to the north-west of the application Site. The site is known locally as 156 West End Lane and Phase 3 demolition is currently being progressed.

- 4.16 317 Finchley Road was granted planning permission on 7 March 2017 (ref. 2016/2910/P) for “**Erection of a part 7 part 10 storey (above basement and lower ground floor levels) building comprising 22 flats (Class C3) (4 x 1 bed, 17 x 2 bed, 1 x 3 bed) and a flexible commercial unit (Use Classes A1/A2/A3) to the ground and lower ground floors, associated public realm improvements including a new footpath to the north of the site, landscaping and associated works, following demolition of existing public house, retail unit and associated structures**”. The site lies to the north of the application Site. The development began construction in 2021. The site is known locally as 317 Finchley Road.
- 4.17 On 25 March 2015, planning permission was granted in relation to land to the north of the Site on land at Midland Crescent, Finchley Road for the redevelopment of the site by the erection of a part 3, 4 and 5 storey building with flexible commercial space, 60-bedroom student accommodation and 9 residential units (ref. 2014/5527/P). We think it is likely that this development has been implemented given a number of pre-commencement conditions have been discharged but the development has not been built out to date.
- 4.18 There is a pending application relating to the Clockwork Factory Apartments at 13 Blackburn Road. The application seeks permission for the demolition of the existing building and construction of three buildings ranging between 1 and 9 storeys in height comprising 53 dwellings, commercial floorspace, publicly accessible space and residential facilities (ref. 2020/2940/P). The site is located to the west of the application Site. The application was submitted in September 2020 and is still under consideration.
- 4.19 The plan below identifies the location of the planning applications referred to above providing the planning context of the area surrounding the Site.



5 Proposed Development

- 5.1 This section of the Town Planning Statement describes the Proposed Development. Further details can be found in sections 9-16 and the accompanying DAS by AHMM.

Background

- 5.2 The current Site represents an underutilisation of land in terms of the benefits that could be realised, and in the backdrop of an acute housing shortage, at the Borough, London and National level. The Site represents a considerable, and rare, opportunity being one of the very few regeneration sites of this scale which remain in LBC. Through comprehensive redevelopment of the Site the Applicant has ensured that the benefits are maximised.
- 5.3 The expansive car park is a particularly inefficient and unattractive use of land and is not consistent with national, regional and local policy objectives on sustainability as it encourages car-borne travel. The Homebase Store, the car showrooms and the Builder's Merchant are also relatively low-density land uses for such a well-connected and central location sandwiched between two Town Centres. The Homebase store is a large standalone building. Homebase entered a Company Voluntary Agreement with its creditors in 2018 and the store is due to close in 2022. The O2 Centre no longer meets retail market expectations and is limited in its ability for adaptation to meet new retailer trends.
- 5.4 The O2 Centre shopping centre is an outdated and inward-looking development, dominated by single transaction car-based trips. It has very limited high street frontage and this is poorly activated providing little functional connection with the wider Town Centre. The design of the O2 Centre and the Site's topography mean that pedestrian permeability and east-west linkages are very poor. The public experience of the high street environment onto Finchley Road is sub-standard.
- 5.5 Internally, the O2 Centre is reaching a point of obsolescence with the current accommodation failing to meet modern retail and leisure market expectations. The internal space is inefficient, dominated by a large atrium space, pedestrian walkway and first floor gallery that suffers from poor footfall. Consequently, the Centre has seen a

number of critical occupiers fail over the last few years. Current occupied uses are dominated by a handful of large format stores that could be re-provided for in a more inclusive and integrated town centre format. The existing design means there are limited opportunities to make significant adaptations to meet these new retailer trends.

5.6 In summary the Centre is outdated and provides poor accommodation suffering from constraints which include:

- i. The specific, shopping centre use;
- ii. A dated and inefficient façade that does not positively contribute to the streetscape;
- iii. Sustainability credentials that do not meet the requirements of modern commercial buildings; and
- iv. A ground floor configuration that provides little in the way of ground floor activation and animation of the Town Centre.

5.7 Given this context, demolition of all existing buildings and a comprehensive residential-led, mixed-use redevelopment scheme is proposed. The Applicant has carefully considered the potential to retain the O2 Centre as part of a wider scheme. However, the nature of the building means that it effectively blocks the Finchley Road frontage and limits permeability and accessibility through the Site which is a key objective of planning policy and of the Applicant in terms of building a cohesive new neighbourhood and successful place-making. In addition, as set out above, the building has very limited flexibility for adaptation to create a modern town centre environment and to meet current and future retailer and leisure operator needs.

5.8 The existing O2 Centre also has poor sustainability credentials. In making the decision to redevelop rather than to refurbish the building, the carbon profile of each option has been assessed. Through retaining and reusing a significant proportion of the O2 Centre structure and materials and taking into consideration the sustainability benefits of the Proposed Development, the proposed redevelopment would deliver a better performance over the life of the project when construction activity and the operational phase are considered. This is discussed further in Section 14 of this Town Planning Statement and

the Circular Economy Statement prepared by Buro Happold and submitted with this Application.

The Core Objectives

5.9 In developing the brief for the redevelopment scheme, consideration has been directed to the objectives of the Site Allocations associated with the Site as set out in the Local Plan, the Neighbourhood Plan and the adopted West End Lane to Finchley Road SPD (2021).

5.10 The SPD seeks a comprehensive approach to the redevelopment of the area between West End Land and Finchley Road. It is acknowledged that this would allow far more effective use of land ensuring that the delivery of tangible benefits to the wider area can be realised. The Vision section of the SPD (page 12) states:

“The comprehensive development and intensification of this insular, low density and poorly connected place will create a new mixed use residential neighbourhood that integrates seamlessly into the wider city...with a variety of housing, including genuinely affordable homes, that connects the town centres of West End Lane and Finchley Road...with variety in uses and activities to enhance the vitality and viability of the town centres and provides for the everyday needs of communities...linked by direct, safe, green and attractive walking and cycling routes passing through new green spaces designed for young and old...that together combine to create a successful sustainable, environmentally friendly and healthier new place with real social value...where shops, work and community infrastructure are on the doorstep of both new and existing residents”.

5.11 As such, the key principles that have guided the masterplan and detailed design process are as follows:

- i. An integrated and comprehensive approach that would deliver a range of public benefits and local priorities;
- ii. The delivery of around 1800 new homes for people at all stages of life, including affordable homes;

- iii. The creation of a strong and vibrant shopping centre to meet the needs of local communities in terms of retail, leisure, cafes/restaurants and workspace while creating sustainable employment opportunities.;
- iv. Improved connectivity between two distinct communities and two public transport nodes for pedestrians and cyclists;
- v. A substantially improved street environment with high quality landscaping and urban greening across the Site;
- vi. A sustainable and safe design of the highest quality that respects the character and heritage value of West Hampstead;
- vii. New green/open spaces including a linear park, children’s play facilities integrated around the Site, a MUGA, and urban greening throughout the Site;
- viii. Space for community facilities including a new health centre;
- ix. A car free development (with the exception of blue badge spaces); and
- x. Building strong and lasting partnerships to ensure a coordinated approach to development and delivery.

Description of Development

5.12 The description of the Proposed Development is set out below:

“Part full and part outline planning permission comprising the following:

Detailed planning permission for Development Plots N3-E, N4, and N5 including demolition of existing above ground structures and associated works, and for residential development (Class C3) and commercial, business and service (Class E) uses in Development Plot N3-E, residential development (Class C3) and local community (Class F2) and commercial, business and service (Class E) uses in Development Plot N4, and residential development (Use Class C3) and commercial, business and service uses (Class E) uses in Development Plot N5 together with all landscaping, public realm, cycle parking and disabled car parking, highway works and infrastructure within and associated with those Development Plots.”

Outline planning permission for Development Plots N1, N2, N3, N6, N7,S1 and S8 including the demolition of all existing structures and redevelopment to include

residential development (Class C3) commercial, business and service uses (Class E), 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.”

A Masterplan for Comprehensive Development

- 5.13 To achieve the benefits of a comprehensive approach set out above, a Masterplan has been prepared for the majority of the land covered by the SPD stretching between West End Lane and Finchley Road (the Application Site). The Masterplan looks at the Application Site holistically and aims to deliver the optimum arrangement and interrelationship of land uses, building and public realm and greatest regenerative benefits. The iterative design process and considerations that led to this approach is set out in Section 7 of this Statement.
- 5.14 As set out above, the Planning Application is made in two parts - part detailed, part outline. The Masterplan is an illustrative document that forms the context for both the Detailed and Outline Proposals. Further details on the form of the Application are provided in Section 6.
- 5.15 The Site has been split into 10 Development Plots. A Linear Park runs to the south of the Development Plots connecting Finchley Road with West End Lane and linking a series of larger publicly accessible open spaces. This green spine running from east to west is proposed as the key new connection through the Site and will be the main pedestrian focussed circulation space through the full length of the Site.
- 5.16 The Proposed Development varies in height between 4 and 15 storeys across the Site. Taking into account the topography and aspect of the Site, the tallest buildings are along the northern edge of the Site. To the south, the building heights step down, allowing maximum sunlight to penetrate the Site. A mix of flexible retail and other commercial and community uses are proposed to activate the ground floor frontages. The upper floors are predominantly residential.

- 5.17 The 10 Development Plots are divided into three-character areas, each with their own distinct characteristics – moving east to west:
- a. The Town Square (off Finchley Road at the eastern part of the Site);
 - b. The Residential Area (located in the central part of the Site); and
 - c. The Community Green (located in the western part of the Site).

The Town Square

- 5.18 The Town Square, to the east of the Site and which is similar to Pancras Square at King's Cross in terms of size, would provide the focus for retail, leisure and employment, strengthening the Finchley Road Town Centre, in which it would become a new focal point for activity and events. It would also be the focus for new jobs within the borough and would provide dining, leisure and shopping to retain activation and animation of the ground floor plane along Finchley Road and around the Town Square. A supermarket is proposed to be re-provided in this area to serve residents of the new proposals and neighbouring communities. Some maker spaces are also proposed at the ground floor along with units for local businesses. The open space at the heart of the Town Square would be used for markets and other events through the year, adding to its vibrancy. The Town Square is designed as a thriving hub for commercial and leisure uses.

The Residential Area

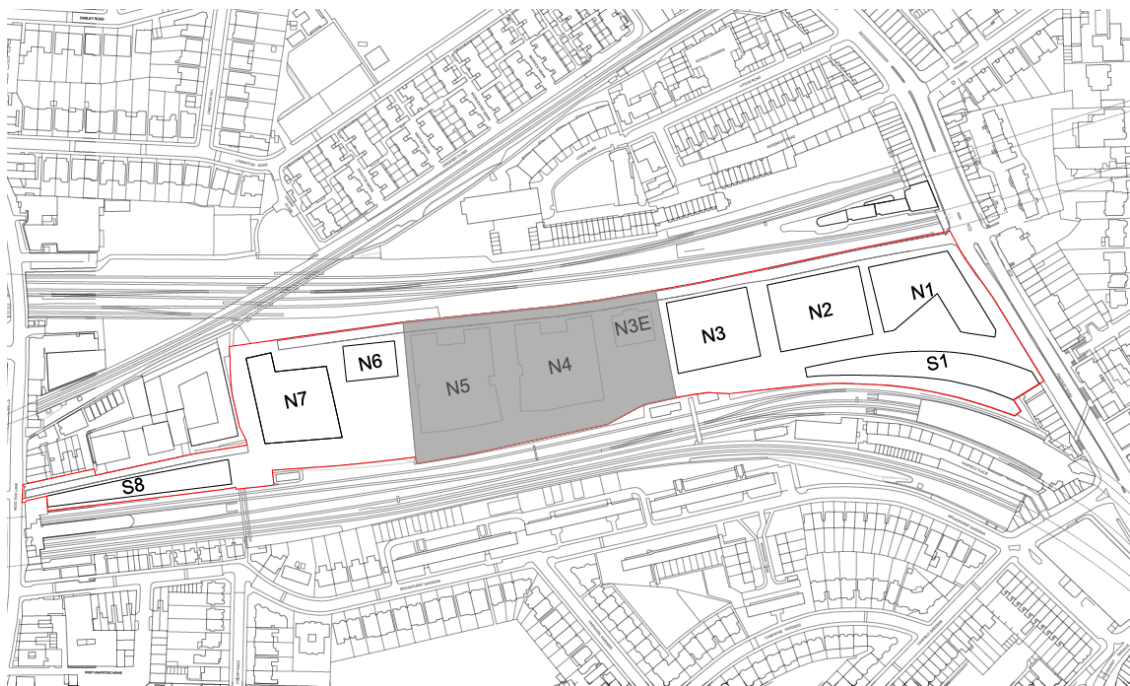
- 5.19 The Residential Area located in the centre of the Site provides a quieter atmosphere with the buildings set around expansive private courtyards and facing on to attractive public realm. The tree-lined Linear Park would run across the south of the Residential Area connecting the new homes to the surrounding facilities and amenities. A wide variety of housing types is proposed ranging from one-bedroom flats to 3-bedroom family homes, along with community facilities and small scale, local, commercial uses.

The Community Green

5.20 Having a community hub within the masterplan is vital. It will help to provide a better quality of life, social cohesion and improved personal health and wellbeing. The Community Green character area to the west of the Site would include uses such as a health centre and small scale, local shops and services built around a large village green. This area extends along Blackburn Road to the west and links up with West End Lane. Locating community facilities such as the health centre in this part of the Site increases their accessibility and inclusiveness due to the location of the proposed bus stop/turning circle to the north of the character area.

The Detailed Proposals

5.21 The Detailed Proposals are split into three development plots covering an area of circa 1.79ha. The Detailed Proposals relate to Plot 3-E, Plot N4 and Plot N5 as shown coloured in grey on the plan below. The land uses proposed within these Plots is set out below and the floorspace proposed can be found in Table 5.1 below.



Plot N3-E

- 5.22 This Plot is located in the middle of the Site. The proposed building would provide a mix of residential (Class C3) units at the upper levels, with retail (Use Class E,a) and Food and Drink premises (Use Class E,b) at ground floor level.

Plot N4

- 5.23 This Plot N4 is located in the middle of the Site. The proposed building would provide a mix of residential (Class C3) units at the upper levels, with community (Use Class F2), retail (Use Class E,a), Food and Drink premises (Use Class E,b) and business (Use Class E,c) provided at ground floor level.

Plot N5

- 5.24 This Plot is located in the middle of the Site. The proposed building would provide a mix of residential (Class C3) units at the upper levels, with retail (Use Class E,a), Food and Drink premises (Use Class E(b) provided at ground floor level.

Floorspace schedule

- 5.25 The proposed floorspace that comprises the Detailed Proposals is set out by land use (in GIA sq m) in Table 5.1 below.

Land Use	Use Class	Plot N3-E (GIA Sq m)	Plot N4 (GIA Sq m)	Plot N5 (GIA Sq m)	TOTAL
Residential including car parking	C3	5,269	23,420	26,491	55,180
Community	F2	0	270	0	270
Retail	E (a)	186	186	1,361	1,733
Food and drink	E (b)	114	0	0	114
Business	E (c)	0	155	0	155

Total Includes all built floorspace – plant, podium car parking, BOH* etc		5,569	24,031	27,852	57,452
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Table 5.1: Total GIA Floorspace by use for Detailed Proposals

*Plant and BOH has been pro-rated between the uses.

Residential use

- 5.26 The Detailed Proposals include a total of 55,180 sq. m GIA of residential floorspace (Class C3) including an allowance for car parking in the podium. The Detailed Proposals include 608 new homes.
- 5.27 All units meet the nationally prescribed space standards¹² and those set out within the London Plan 2021.
- 5.28 In respect of Wheelchair Accessible Units, 10% of the units would comply with Category M4 (3) of Part M of the Building Regulations, with the remaining 90% complying with Category M4 (2) of Part M, as required by the London Plan/Housing SPG.
- 5.29 The internal layouts of the buildings have been carefully designed to minimise single aspect units with 54% of the total number of homes within the Detailed Proposals being dual aspect. Of the affordable homes, 64% would be dual aspect (90% of the social rented units and 38% of the intermediate rent units) with 50% of the private units being dual aspect. There are no north facing single aspect units.

¹² Department for Communities and Local Government – Technical Housing Standards – Nationally Described Space Standard 2016

Affordable Housing

5.30 The affordable housing is proposed to be located in Plot N4 in the Detailed Proposals. Of the 608 new homes, 188 homes would be affordable. This represents 35% affordable housing by floorspace and habitable room (GIA).

5.31 The affordable element will comprise a mix of two products:

- i. Low-Cost Rent; and
- ii. Intermediate.

5.32 The scheme proposes 60% Low-Cost Rent and 40% Intermediate by floorspace (GIA). The split for the Detailed Proposals is set out in the table below:

Type of Housing	Private	Low-Cost Rent	Intermediate
Studio	59 (14%)	0	0
1 bedroom	157 (37%)	14 (13%)	48 (57%)
2 bedroom	187 (45%)	36 (35%)	25 (30%)
3 bedroom	17 (4%)	54 (52%)	11 (13%)
Total	420	104	84

Table 5.2: Detailed Proposals Housing Mix

Landscaping and Public Realm

5.33 A “one shared landscape” has been used. The vision for the site is for one shared landscape in which architecture and landscape are experienced in together as part of a carefully crafted dialogue between the two along the length of the site. Working from east to west and north to south the proposals create a series of links each with their own

character, whilst remaining rooted in a collective composition of spaces that embed themselves along a green living edge.

5.34 The Detailed and Outline Proposals propose a landscape led masterplan that creates a strong and attractive east-west route through the Site, for the first time, from Finchley Road to West End Lane, improving east to west connectivity and the Site's permeability with green spaces and mature tree planted along its edge.

5.35 Over half of the masterplan is dedicated to public realm. These include:

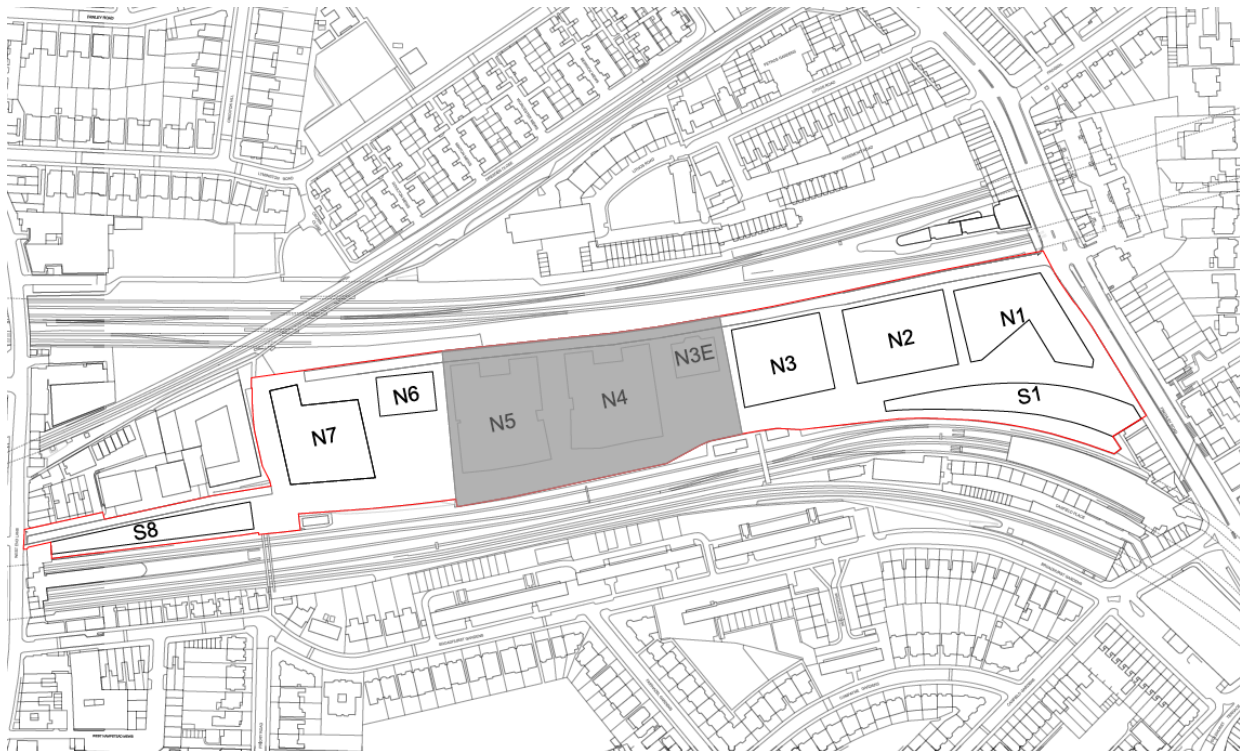
- i. Parks, squares and play spaces;
- ii. Streets and paths; and
- iii. Roads and shared surfaces.

5.36 The Detailed Proposals provide 4,943sq. m of open space and 2,100sq.m of playspace

5.37 The Detailed Proposals fall within the Residential Neighbourhood character area. The Residential Neighbourhood is focussed around a new urban public green. This would be a pedestrian only space for people to gather and relax. The proposed space would front on to the linear park running along the southern side of the Site which has been designed as a pedestrian and leisure cycling only route. It would be mostly soft landscaped with places to walk, sit, relax, play and gather and is nature/biodiversity focussed with provision for water management through SUDs. Trees and semi-natural vegetation pockets are proposed along the park. The northern part of this character area would be a neighbourhood road for vehicular and pedestrian movement cohabitation, providing a place to walk but also sit including street furniture, rain gardens and street planting.

Outline Proposals

5.38 The Outline Proposals is divided into seven Development Plots (Plots N1, N2, N3, N6, N7, S1 and S8) as shown in white on the plan below.



5.39 The land uses proposed as part of the Outline Proposals are as follows:

- i. Residential (Use Class C3);
- ii. Commercial / non-residential comprising:
 - A mix of Class E uses (retail, food and drink, financial and professional services, indoor sports and recreation, medical services, creche / day centre or nursery, and office and workspace);
 - Drinking Establishment (Sui Generis);
 - Cinema (Sui Generis); and
 - Local Community (Use Class F2).

5.40 The Development Specification splits the maximum quantum out between the Outline West Plots (N6, N7 and S8) which form Phase 2 and the Outline Proposal Development Plots that Site in the town centre (S1, N1, N2 and N3) which form part of Phase 3,

5.41 There is a cap on the total amount of development in the Outline Application of 132,410sq. m GIA. The total maximum development floorspace has been divided between the Development Plots in accordance with the Development Plots Floorspace

Schedule contained within the Development Specification document. The Development Plots Floorspace Schedules set out the maximum floorspace that can be provided as residential (Class C3) and as commercial/non-residential floorspace.

5.42 Minimum floorspace quantum will also apply to the health centre (Class Ee), cinema (Sui Generis) and affordable workspace (Class Eg) uses and can be found within the Development Specification document.

5.43 Further detail on the maximum floorspace proposed as part of the Outline Proposals can be found in the Development Specification document.

Residential

5.44 The Outline Proposals will include up to 115,000 sq. m GIA of residential floorspace including an allowance for residential car parking. The total residential use across the Site, including residential parking in podiums could therefore be up to 170,180sq. m GIA which for the sake of the Environmental Impact Assessment has assumed that this equates to around 1,800 residential units.

5.45 The proposed unit mix range as a percentage are shown below:

Type of Housing	Private	Low-Cost Rent	Intermediate Rent
	Percentage	Percentage	Percentage
Studio	0-20%	0-5%	0-20%
1 bedroom	0-40%	0-25%	0-30%
2 bedroom	30-50%	20-25%	20-40%
3 bedroom	0-5%	45-50%	0-15%

Table 5.3 Outline Proposals Housing Mix

Affordable Housing

- 5.46 Each of the two phases that form the Outline Proposals will provide 35% affordable housing by floorspace (GIA). The affordable element will comprise a mix of two products:
- i. Low-Cost Rent; and
 - ii. Intermediate Rent .

- 5.47 The scheme proposes 60% Low-Cost Rent and 40% Intermediate Rent by floorspace (GIA).

Landscaping

- 5.48 The Outline Proposals will provide a minimum of 0.81 hectares of open space as set out in Parameter Plan 19066_X_(02)_103.
- 5.49 The quantum of play space provided in the Outline Proposals will be calculated at the Reserved Matters Stage.

Transport and Access and Egress

- 5.50 The Proposed Development is car free with the exception of 3% disabled 'blue badge' spaces, servicing and drop off points. A total of 1,064 long stay and 100 short stay cycle spaces would be provided in the Detailed Proposals, with the cycle provision in the Outline Proposals being determined at the Reserved Matters Stage once a precise mix of development is known and in accordance with policy requirements.
- 5.51 Vehicular access would be maintained from Finchley Road and West End Lane, with the junction of Blackburn Road and Finchley Road reduced in scale to reflect the changing nature of the Site. The existing bus routes would continue to enter the Site from Finchley Road and stop on Blackburn Road, with a revised turning space provided at the western end of Blackburn Road for turning buses as well as other vehicles.
- 5.52 A recreational pedestrian and cycle route forming part of the Linear Park would be available across the southern side of the Site with a more direct route available to cyclists

via Blackburn Road. Pedestrian permeability would also be improved with a network of pedestrian routes connecting through the Site between Finchley Road to West End Lane. Large publicly accessible spaces for the community to congregate, socialise and play are interspersed along the Linear Park between the building plots. The public realm represents 50% of the total Site area.

- 5.53 Delivery and servicing activity would be from Blackburn Road or via the proposed service yard.

Energy and Sustainability

- 5.54 Sustainability is a core business priority for LS (Finchley Road) Limited, the Applicant, and has been a key consideration in the development and evolution of the proposals. As such, sustainability has been embedded within the Application in line with planning policy at all levels. The energy strategy for the Site is a key part of the sustainability strategy, considered from the start of the project, and is central and integral to the proposals. The Applicant has long term experience of managing complex assets and has considered the energy strategy in a holistic and long-term manner ensuring the best output.
- 5.55 As a large-scale phased masterplan, the overarching strategy is to provide a simple, future-proofed approach to energy efficient and low carbon buildings with consideration given to the circular economy and whole life carbon. The strategy is intended to exploit the benefits of current technologies while providing flexibility for future technologies and policy developments. Performance outcomes will be delivered in practice, minimising carbon emission now and in the future, whilst also considering running costs to tenants and residents.
- 5.56 A fabric first approach has been taken exploring passive design optimisations and energy efficiency measures. This considers thermal analysis and performance to reduce energy usage as the starting principle. An all-electric solution is proposed that would result in a low carbon solution today which is able to improve as the grid continues to decarbonise. This means that the Proposed Development would be combustion free and support a clean energy system that will benefit local air quality and human health.

- 5.57 The energy strategy sets out that in the Detailed Proposals there will be a 66.3% reduction over Part L baseline which significantly surpasses the GLA policy target of 35% on-site CO₂ emission reductions. For the Outline Proposals the CO₂ emission reductions are expected to be 53%, again well surpassing the GLA baseline target.
- 5.58 BREEAM Certification (Internationally recognised sustainability standard for buildings) New Construction 2018 to an 'Excellent' standard for commercial spaces is proposed with Embodied carbon of new build to be designed targeting the GLA aspirational targets, <500 kgCO₂/m² GIA (modules A1-A5), reducing over time as future phases are brought forward.
- 5.59 The Proposed Development includes water efficiency measures including rainwater harvesting and a holistic storm water management strategy built into the natural environment.
- 5.60 Circular economy principles are built into the landscaping design through onsite material reuse from existing O2 Centre and Homebase store and the recycling and reuse of materials.
- 5.61 Further information can be found in the detailed Energy and Sustainability Assessments.

Phasing

- 5.62 As set out within the Environmental Statement, the construction of the Proposed Development is expected to take between 10 - 15 years. An indicative phasing plan has been submitted with the Application to reflect this. This is discussed in further detail in the next chapter. LS (Finchley Road) Limited, as owners and operators of the O2 Centre, would ensure that placemaking is engrained within the Proposed Development from day one and during the interim construction phases as well as minimising the impact of construction on the operation of the O2 Centre, local area and community throughout the development process.

5.63 Phase 0 will comprise the delivery of enabling infrastructure and the demolition of Homebase¹³ that would take place before any of the built development comes forward. This Phase 0 will not provide any chargeable floorspace for the purposes of the Community Infrastructure Levy.

Temporary Planning Applications for Linear Route During Construction

5.64 As the Proposed Development would come forward over a number of years, once Phase 1 has been built and occupied, there would still be construction activity occurring to the east and west as the later phases come forward. It is important that residents and businesses in Phase 1 have safe, secure and attractive routes to their homes and premises at all times. The Applicant wishes to ensure that the high-quality character and social value of the new neighbourhood is being established from day one.

5.65 As such it is proposed that a series of separate planning applications for temporary routes, temporary landscaping and temporary pop-up uses would come forward at a later date and these would be put in place during the various construction phases.

5.66 As the development of the various phases comes forward and provides the permanent treatments of these areas, the temporary permissions would fall away.

5.67 This is particularly important in respect of the creation and treatment of a temporary pedestrian route (running on the south side of the Site from Blackburn Road in the west to the rear access to the O2 centre in the east), pending the delivery of the full Linear Park.

5.68 The Reserved Matters Applications (RMA) for the Outline Proposals would then set out the permanent treatment of the sections of the Linear Park in the outline phases.

5.69 The temporary applications would show how a seamless pedestrian route would be created across the southern section of the Site. This route would be put in place from the start of the construction phase to ensure that there is a continuous safe and secure east

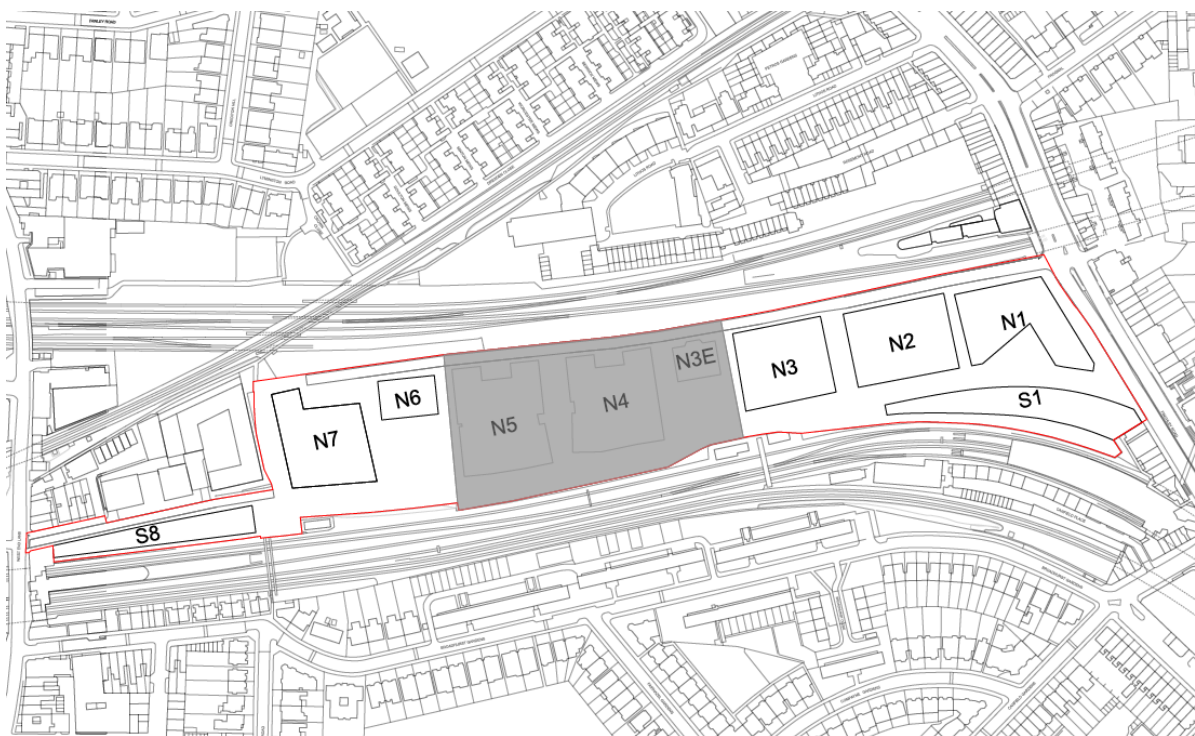
¹³ See Chapter 5 of the Environmental Statement

west pedestrian route through the Site at all times. The route would be defined to the north by site hoardings or temporary fencing. To the south it would be defined by the railway edge.

- 5.70 The DAS prepared by AHMM provides further information on the proposed approach to interim landscaping, routes and pop-up uses and activities.

6 Application Structure

6.1 The Application is submitted in part detail and in part outline. Plots N3-E, N4 and N5 and associated parts of Blackburn Road and the Linear Park are submitted in detail (“Detailed Proposals”) and the remaining plots (N1, N2, N3, N6, N7, S1 and S8), with the remainder of Blackburn Road, the Linear Park and public realm are submitted in outline (“Outline Proposals”). This is shown on the plan below with the Detailed Proposals shaded grey and the Outline Proposals in white.



6.2 The Detailed Proposals include information for approval in respect of:

- Access;
- Appearance;
- Landscaping;
- Layout; and
- Scale.

6.3 This is the level of information required for full planning permission to be granted and no further details need to be submitted before the scheme can be built (aside from any minor details required by conditions attached to planning permission).

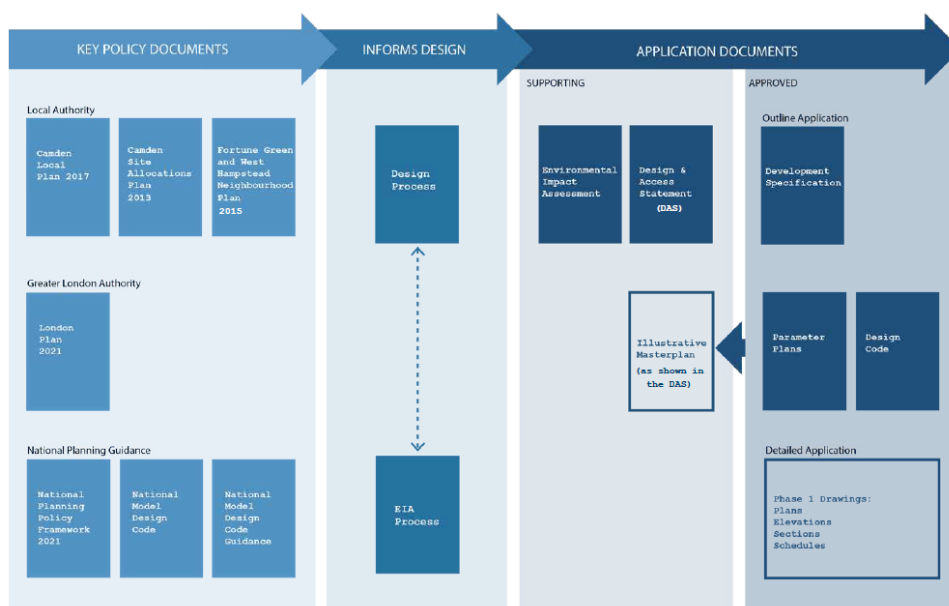
6.4 The Outline Proposals (Plots N1, N2, N3, N6, N7, S1 and S8) have a more limited amount of information provided. Unlike the Detailed Proposals, the Outline Proposals do not seek approval of details such as appearance/architectural design.

6.5 The Application reserves all matters for the Outline Proposals. In accordance with Town and Country Planning (Development Management Procedure) Order 2015 and National Planning Practice Guidance (NPPG Paragraph 006 Reference ID: 14-006-20140306) reserved matters are defined as:

- i. 'Access' – the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network.
- ii. 'Appearance' – the aspects of a building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture.
- iii. 'Landscaping' – the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the Site and the area in which it is situated and includes: (a) screening by fences, walls or other means; (b) the planting of trees, hedges, shrubs or grass; (c) the formation of banks, terraces or other earthworks; (d) the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and (e) the provision of other amenity features.
- iv. 'Layout' – the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development.
- v. 'Scale' – the height, width and length of each building proposed within the development in relation to its surroundings.

- 6.6 The Outline Application seeks permission for the general principles of the development such as the proposed land uses, the scale of development and how the Site can be developed. These general principles are set out in three documents:
- a. **The Parameter Plans** – which set out in plan form the maximum, and sometimes minimum, parameters that the fully designed development must conform with (for example, in terms of heights, building footprints, amount of open public realm etc).
 - b. **The Design Codes** – which provide a detailed guide to the design principles that the fully designed development must incorporate or have regard to. Some of these are mandatory and therefore “rules” and some are guidelines.
 - c. **The Development Specification** – which sets out in text the details of the outline application. For example, it sets out the amount of floorspace that may be provided for type of land use. A maximum quantum of floorspace for each land use is given. There is also a minimum quantum for some land uses, where it is important that this is delivered. It also sets other aspects such as the minimum amount of public realm and the approach that would be taken to open spaces and playspace.
- 6.7 The Outline Proposal seeks approval of the parameters and controls set out in the Development Specification, Parameter Plans and Design Codes (referred to below as the Outline Application Framework).
- 6.8 Outline planning permission would be granted subject to conditions requiring the subsequent submission and approval of one or more RMAs. The subsequent RMAs would contain the full details of the scheme’s access, appearance, landscaping, layout and scale which are not included in the Outline Proposals.
- 6.9 The RMAs would be submitted to the Council in the coming years. LS (Finchley Road) Limited, would undertake full public consultation on the reserved matters proposals before they are submitted to LBC. Once submitted to LBC, the Council will also carry out a public consultation exercise, before the reserved matters applications are determined.

- 6.10 This approach is often used on very large schemes, where development would occur over a number of years, in order to allow some flexibility in the design and exact mix of uses. However, the Outline Planning Permission defines the maximum scale of development, maximum heights, maximum amount of different types of use and it would also control important aspects such as the minimum amount of open space and the location of key routes (as set out above).
- 6.11 The footprint, massing and detailed design of the buildings would be addressed through the submission of RMAs following the grant of any Outline Planning Permission. These detailed submissions would be informed by the Outline Application Framework.
- 6.12 In this case, in order to demonstrate how the Outline Proposals could come forward as a fully designed scheme that accords with the parameters set out within the Outline Application Framework, an Illustrative Masterplan has been developed. The Illustrative Masterplan demonstrates the form of development that could come forward within the parameters and principles. This is just one interpretation of the Outline Application Framework. At the Reserved Matters stage, the scheme may look different, but it would need to conform to the general principles set out within the Outline Application Framework.
- 6.13 In terms of the documentation which is submitted for approval and that which is illustrative supporting information, this is summarised below:



7 Consultation and Community Engagement

- 7.1 This section summarises the consultation process and how the Proposed Development has evolved in response to comments received during the pre-application process. For further detail please refer to the Statement of Community Involvement (SCI) produced by London Communications Agency (LCA) and 2-3 Degrees, and the Design and Access Statement (DAS) prepared by AHMM.
- 7.2 Consultation is recognised as an essential tool for balancing the views and needs of different interest groups and securing mutually compatible solutions and as such has played an important role in the evolution and preparation of this Application.
- 7.3 Paragraphs 39-46 of the NPPF highlight the importance of pre-application engagement; early engagement has significant potential to improve the efficiency and effectiveness of the planning system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improves outcomes for the community.
- 7.4 Policy GG1 part A of the London Plan encourages early and inclusive engagement with stakeholders and local communities on the development of proposals.
- 7.5 Local Planning Authorities are required to produce a Statement of Community Involvement in accordance with Section 18 of the Planning and Compulsory Purchase Act 2004 (as amended).
- 7.6 Local Planning Authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage and the more issues that can be resolved at pre-application stage, the greater the benefit.

Consultation Strategy

- 7.7 The Proposed Development has been subject to extensive consultation for a period of approximately two and a half years, up to the submission of this Application in January 2022. The strategy, feedback received and how the Proposed Development has evolved

in response to the consultation is set out in this document and in the DAS prepared by AHMM.

- 7.8 An initial phase of consultation with LBC and the local community was carried out in 2019 for a previous, smaller masterplan scheme, which considered bringing forward a residential-led development of approximately 900 homes on a podium above the existing O2 Centre car park. The Council expressed a number of concerns about the masterplan. Specifically, they considered that the retention of the majority of the car parking on Site was undesirable and contrary to national and local planning policies. In addition, the continued lack of east west permeability through the Site was a concern and it was considered that a clearer public benefits package was required.
- 7.9 In addition, LBC was preparing a new informal planning guidance document that was published in September 2019 - A New Neighbourhood in West Hampstead – guidance and principles for a new place. This document set out the Council’s requirement for the wider area between Finchley Road and West End Lane to have “a comprehensive and ‘joined up’ approach making far more effective use of land based on a masterplan approach to ensure that the delivery of tangible benefits of change and intensification can be realised.”¹⁴
- 7.10 In the context of feedback from LBC and the guidance in the above document, and in considering how the benefits and regenerative effect could be maximised, the Applicant concluded that the initial scheme had a number of limitations as listed below:
- i. It failed to deliver the potential transformative regeneration and place-making benefits that a more comprehensive approach would achieve.
 - ii. It did not optimise the potential for a well-planned and comprehensive redevelopment of a brownfield Site.
 - iii. It did not optimise the numbers of new homes and affordable homes that the wider area was capable of delivering and that the LBC’s needs to meet demand.
 - iv. The opportunities for providing a significant quantity of high-quality open space was limited compared with a wider regeneration scheme. The 2019 consultation

¹⁴ See page 13 of LBC’s A New Neighbourhood in West Hampstead – Guidance and Principles for a New Place document, September 2019.

responses demonstrated that there was a strong local desire to see more publicly accessible green space in the area.

- v. It failed to create a strong and attractive east-west route through the Site from Finchley Road to West End Lane, and therefore did not improve east to west connectivity and the Site's permeability.
- vi. It could have created an unwelcoming and undesirable new place that prioritised the car and servicing for the O2 Centre above new pedestrian and cycling routes.
- vii. It did not respond to the changing requirements of the retail and leisure market and provide more accessible and activated ground floor uses in the town centre.

7.11 Therefore, following the initial stage of consultation, the public engagement was paused. The Applicant then worked to develop a vision for the wider area, considering a larger scale and more comprehensively-planned masterplan incorporating the O2 Centre, the car park, the Homebase Store, the car showrooms, and the Builder's Merchants. This expanded area aligns with the area covered by LBC's document – A New Neighbourhood in West Hampstead – guidance and principles for a new place, and this work demonstrated that taking a more comprehensive approach could enhance and maximise the benefits that could be achieved from the regeneration of the area. Both the Applicant and LBC separately concluded there could be significant public benefits in delivering a more comprehensive redevelopment and a transformative masterplan.

7.12 Also of note, in February 2020 the Council published the draft Site Allocations Local Plan document for consultation. Within this the WH12 site allocation encompassed the O2 Centre and carpark, the Homebase and the car showroom sites as an area "allocated for comprehensive residential led redevelopment".

7.13 Engagement was resumed with LBC in June 2020 on the new comprehensive O2 Masterplan, which is what the remainder of this chapter focusses on. The current masterplan which is the subject of this Application looks at the area between Finchley Road and West End Lane holistically and aims to deliver the optimum arrangement and interrelationship of land uses, buildings and public realm and greatest regenerative benefits. In taking a comprehensive approach, the masterplan is able to deliver a high quality "place" and significantly more social, economic, infrastructure and community benefits. This includes:

- i. Making a much more significant contribution to LBC's housing targets, including 35% affordable housing.
- ii. More public and green open spaces.
- iii. The potential for community and healthcare facilities on Site.
- iv. New space for flexibly designed retail, which is fit for the long term.
- v. Much-improved permeability through the Site, with a strong and attractive east-west route.
- vi. A much more pedestrian friendly environment, with a shift away from the car and towards new walking and cycling routes.
- vii. Significantly more job opportunities and local spend generated by the scheme.
- viii. A much better utilised and optimised brownfield site.

7.14 Detailed pre-application discussions have taken place with LBC planning, design, highways and other officers, as well as the following key stakeholders:

- Greater London Authority
- Environment Agency
- Historic England and Greater London Archaeological Advisory Service (GLAAS)
- Natural England
- Transport for London
- London Underground Limited
- Network Rail
- Thames Water

7.15 In addition to the above, there have been a number of other consultation meetings with LBC including a Strategic Panel (SP), two Design Review Panels (DRPs), a Development Management Forum (DMF), and a Developer's Briefing (DB). These are dealt with in more detail below.

7.16 There has been an ongoing and comprehensive programme of consultation and engagement with the local community including both formal and informal public consultation events. Discussions have also been held with the owners and occupiers of the Site.

7.17 The consultation activities reflect the principles of consultation in the Localism Act (2011) and in the National Planning Policy Framework (2021). They are also in accordance with the LBC’s Statement of Community Involvement in Planning (July 2016).

London Borough of Camden (LBC)

7.18 Extensive pre-application meetings and workshops have been held with officers from LBC since June 2020 on the revised and wider masterplan scheme.

7.19 This includes meetings to discuss strategic planning matters, as well as a range of topic-based workshops dealing with individual topics. A list of these meetings is set out below:

- Introductory meeting – June 2020
- Exploration of layouts – July 2020
- Public space concept – September 2020
- Public space study – October 2020
- Character areas and massing – October 2020
- Layouts and design – November 2020
- Layouts and design – January 2021
- Design and massing – February 2021
- Layouts and building form – March 2021
- Public space and massing – May 2021
- Detailed design – July 2021
- Design codes – September 2021
- Landscape design – October 2021
- Design update and plot testing – November 2021
- Design codes and control documents – November 2021
- Interim place making – December 2021

7.20 The DAS prepared by AHMM should be referred to for more detail on how the proposals have evolved in response to officers’ comments raised at the above meetings.

Strategic Panel (SP)

- 7.21 A presentation was given to LBC's SP in November 2020. A response from the SP was received on 3 December 2020.
- 7.22 The Council set out in its response that the Site has strategic importance for LBC as its scale gives it great significance for new housing, creating a new district in a part of the borough which would connect communities in West Hampstead and Finchley Road. The panel felt that some positive moves since the 2019 scheme was reported had been made and the decision to extend the application Site to include adjacent parcels of land including the O2 Centre was welcomed, helping to align with the Council's vision for comprehensive redevelopment set out within the emerging SPD.
- 7.23 The Council outlined that, in appropriate circumstances, it would lend support to facilitate a scheme that would unlock the Site's full potential by using its statutory powers. The aspiration for a highly sustainable development, including a focus on biodiversity, was also welcomed.

Design Review Panel (DRP)

- 7.24 The first LBC DRP took place on 6 November 2020. Full feedback from this is detailed in the accompanying DAS and SCI. However, in summary, the DRP had the following comments on the proposals:
- The ambition for a development which could be an exemplar for similar schemes in the future and the ambitions for sustainability was welcomed;
 - The Site would be appropriate for high density development given its location and access to transport;
 - The public square could provide benefits for the wider public;
 - Any development would need to engage with the buildings fronting Greenway/Linear Park;
 - A substantial green space must open to the wider community;
 - Any development at Blackburn Road would need to be attractive and safe; and

- An analysis of the O2 Centre's community uses for teenagers and families would help to identify which of its function may be retained in the new scheme.

7.25 A second LBC DRP took place on 2 July 2021 following a period of design development. Full feedback from this is detailed in the accompanying DAS and SCI. However, in summary, the DRP had the following comments on the proposals:

- Pleased by the Applicant's positive responses to its previous comments, particularly height, massing and open space;
- Whilst noting that the scheme is dense, the quantum of accommodation relates positively to the surrounding area;
- The design of the development has high quality details and a good looking appearance;
- Reassured by the animated entrance on Blackburn Road and the development of the landscape strategy;
- Reservations expressed about the amount of non-residential ground floor space, particularly in phase 1;
- The concept of the Linear Park was commended in connecting different green spaces and involving the London Wildlife Trust; and
- Consideration should be given to the accommodation for community organisation which should animate and survey open spaces.

7.26 The comments received from each of the DRPs were considered by the team, in the iterative design process, to see how the Proposed Development could be improved in response to the comments made.

Development Management Forum (DMF)

7.27 The proposals were presented at the DMF run by LBC on 27 July 2021. Officers outlined the planning policy context for the Site and the Applicant presented the proposals. The presentation was followed by a detailed Q and A session. Key questions were around land uses, public realm, density, number of homes / affordable housing and transport infrastructure.

Developer's Briefing (DB)

- 7.28 The proposals were presented to LBCs Developer's Briefing on 24 August 2021. 11 Councillors attended (both ward councillors and those from the Planning Committee) and two officers from LBC.
- 7.29 Generally, the proposals were well received; the main comments and questions related to affordable housing, housing mix, density and transport infrastructure improvements.

Other Consultees

Greater London Authority (GLA)

- 7.30 The first pre-application meeting with the GLA was held on 23 June 2021. The advice received from the GLA identified the strategic planning issues associated with the proposals and is set out in further detail within the accompanying DAS. The GLA identified the need for a further pre-application meeting.
- 7.31 The second pre-application meeting with GLA officers was held on 5 September 2021. The GLA accepted the height and massing of the Proposed Development given the local context and the Site's urban location but requested for further variety in the architecture of the skyline to ensure the success of the scheme and its potential to transform the area. The GLA also noted that the architecture and landscape must continue to evolve together as a condition for success of such a large-scale development.

Historic England (HE)

- 7.32 The proposals were sent to HE in September 2021, and a presented made to them on 15 December 2021. A letter of response was issued on 16 December 2021.
- 7.33 In summary, HE does not object to the Proposed Development. The amendments to the scheme, to take on board LBC's and HE's comments to date, were welcomed. HE noted that the proposed buildings on the Site are substantially greater than that found within the

conservation areas that surround it and would therefore appear in some views from within them and out of them.

- 7.34 In summary, HE considers that the proposals would result in less than substantial harm to designated heritage assets through development within their setting which would need to be weighed against the public benefits of the Proposed Development by LBC officers in determining any Application.

Transport for London (TfL)

- 7.35 As part of the preparation of the Transport Assessment (TA) and associated documents, prepared by Arup, representatives from TfL (in its capacity as the strategic transport authority) and LBC (in its capacity as the local highway and planning authority) were consulted. The following meetings took place with TfL (which LBC also attended in some instances):

- 29 April 2021 – Initial pre-application screening meeting with TfL
- 7 July 2021 – Full pre-application meeting with TfL (and LBC)
- 15 July 2021 – Meeting with TfL to discuss public transport modelling

The TA scope and methodology was also prepared and issued to TfL in June 2021.

- 7.36 Comments received from TfL (and LBC) have informed the design development of the scheme.

- 7.37 In addition to the above, discussions have also taken place regarding station access at Finchley Road and West Hampstead underground stations. These meetings took place on:

- 21 July 2021 – initial station access meeting
- 9 September 2021 – station access workshop

London Underground Limited (LUL)

- 7.38 A number of meetings have been held with LUL throughout the design development stage to discuss the Proposed Development and potential implications for LUL assets. Meetings have covered access to lineside equipment, boundary fencing, the Builder's Merchant, the proposed utilities corridor, Plowman Craven surveys and incoming power and cable routes. Comments received have been taken on board.

Network Rail (NR)

- 7.39 Meetings have been held and are continuing to be arranged with NR to discuss the proposals for the Site. To date discussions have focussed on seeking to enter into a Basic Asset Protection Agreement (BAPA) with NR. Dialogue would continue after the Application is submitted.

Community Consultation

- 7.40 The Applicant conducted four comprehensive phases of consultation to understand how the local community view and use the Site, their priorities for the future, and their feedback on the masterplan and designs as they have evolved.

- 7.41 The dates of each of the four comprehensive phases are highlighted below:

- Phase 1: September 2020 – November 2020;
- Phase 2: December 2020 – January 2021;
- Phase 3: April 2021 – June 2021; and
- Phase 4: October 2021 – November 2021.

- 7.42 The four phases of consultation comprised a thorough programme of surveys, workshops, webinars, in person events, meetings with key stakeholders and site tours, alongside promotion and activities such as a dedicated project website, social media advertising, Instagram polling, newspaper adverts, press releases, flyers, newsletters, consultation summaries, news updates to project website, presentations and tenant's briefings.

- 7.43 In phase one, 55,546 people were reached through social media advertising with 5,061 page visits to the common place website. In Phase two, 27,983 people were reached through social media advertising with 6,538 page visits to the commonplace website. In Phase three, 146,166 people were reached through social media advertising with 9,904 visits to the dedicated project website. Phase four saw 133,341 people reached through social media advertising, with 13,341 visits to the dedicated project website.
- 7.44 The consultation also included a youth engagement programme in partnership with youth engagement specialists, 2-3 Degrees. The programme of workshops would continue until Summer 2022 with further engagement with youth ambassadors continuing into the longer term. To date, 41 young people have enrolled in the programme. Please see the SCI for further details on the youth engagement programme.
- 7.45 Throughout the consultation process, the Applicant has been mindful of and responded to changing Covid-19 pandemic restrictions. The Applicant reacted to the impact of the restrictions by ensuring that people could view and comment on the proposals in a number of ways, employing a range of digital and physical methods, and conducting face to face engagement when possible. In the first three Phases, consultation was digitally led, and a range of methods were employed to allow people to have their say, including those who did not have access to the internet. As restrictions eased, the Applicant was able to hold a number of in-person meetings and events while still ensuring all material was accessible online for those who did not feel comfortable attending in person.
- 7.46 Further details of phases of the community consultation and the activities undertaken within each stage are provided in the SCI produced by LCA and submitted alongside this Town Planning Statement.

Summary

- 7.47 The consultation strategy has been extensive and has sought to engage with statutory and non-statutory consultees including residents, local businesses, community groups and politicians throughout the design process.

- 7.48 The Application proposals have been revised, to reflect comments raised throughout consultation, particularly in relation to the proposed building design, public open space and public realm and affordable housing. Further details can be found within the submitted DAS and SCI.
- 7.49 The Applicant is committed to maintaining an ongoing dialogue and co-creation with the local community and key stakeholders, to ensure they are kept informed of the progression of the proposals following the submission of the Application and throughout the evolution and development of the outline phases.

8 Planning Policy Context

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.
- 8.2 Planning policy operates at national, regional and local levels. At a national level, Central Government adopted the National Planning Policy Framework (NPPF) in March 2012. The latest updates to the document were published in July 2021.
- 8.3 The Statutory Development Plan for the purposes of Section 38 (6) of the Planning and Compulsory Purchase Act 2004 comprises:
- a. The London Plan 2021;
 - b. LBC's Development Plan which consists of the Local Plan (2017), Policies Map, Site Allocation Document (2013) and various Area Plans;
 - c. The Fortune Green and West Hampstead Neighbourhood Plan (2015).
- 8.4 Both the London Plan and LBC's Development Plan are supported by various adopted Supplementary Planning Guidance documents which are also material considerations.

National Planning Guidance

The National Planning Policy Framework (NPPF) 2021

- 8.5 The Ministry of Housing, Communities and Local Government published the revised NPPF in July 2021. This follows the 2019 revision of the NPPF originally published in 2012.
- 8.6 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It summarises in a single document all previous national planning policy advice. The NPPF must be taken into account in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.

- 8.7 The NPPF introduces the presumption in favour of sustainable development although it makes it clear that the Development Plan is still the starting point for decision making.
- 8.8 The presumption in favour of sustainable development is intended to ensure that the planning system focuses on opportunities for positive growth, making economic, environmental and social progress for current and future generations. The presumption, in practice, means that significant weight should be placed on the need to support economic growth through the planning system and local planning authorities should plan positively for new development and approve all individual proposals wherever possible. However, development should not be allowed if it would undermine the key principles for sustainability in the NPPF. The NPPF makes clear that the policies should apply “unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits” (paragraph 11(b)).
- 8.9 Chapter 9 of the NPPF sets the expectations in terms of promoting sustainable transport and advises that transport issues should be considered from the earliest stages of plan-making and development proposals, in order to address the impacts of development proposals, to identify opportunities from existing or proposed transport infrastructure in relation to the scale and location of development proposed, to assess any environmental impacts of traffic and infrastructure and to mitigate accordingly, and to take into consideration patterns of movement to ensure transport considerations are integral to the design of schemes.
- 8.10 Chapter 11 of the NPPF relates to making efficient use of land and advises that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses while safeguarding the environment and ensuring safe and healthy living conditions.
- 8.11 Section 16 of the NPPF states that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development. In terms of listed buildings, Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage assets should require clear and convincing justification. Paragraph 201 states that where a development proposal

would lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Planning Practice Guidance, 2014 (as amended)

- 8.12 The Planning Practice Guidance was produced and published by the Department of Communities and Local Government ('DCLG') in March 2014 and has been varied and supplemented on a number of occasions since.

The London Plan (2021)

- 8.13 The London Plan (published 2 March 2021) is the overall strategic plan for Greater London, defined to include the 32 Boroughs and the City of London. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas and forms part of the Statutory Development Plan.

- 8.14 The London Plan is centred around 'Good Growth', with a focus on building strong and inclusive communities, making the best use of land, creating a healthy city, growing a good economy and increasing efficiency and resilience. The Plan recognises the key role of Central London as a driver for London and the wider UK economy.

- 8.15 In terms of designations, the Site falls within the Swiss Cottage / Finchley Road District Centre, as defined by the London Plan. The District Centre is considered to be a Strategic Area for Regeneration with a "high" potential for residential growth and "low" potential for commercial growth.

Local Planning Policy: Camden Local Plan (2017)

- 8.16 At the local level, LBC's Local Plan (2017) was adopted by Council on 3 July 2017 and replaced the Core Strategy and LBC's Development Policies documents as the basis for planning decisions and future development in the borough. This, coupled with LBC's Proposals Map and Site Allocations Plan (2013) forms the local tier of the

Development Plan and is therefore central to planning decisions and the control of future developments in the borough.

Site Specific Designations

8.17 Within the LBC Local Development Framework ('LDF'), the Site has the following designations:

- West Hampstead Interchange – Growth Area (excluding the O2 Centre building)
- Site Allocations – O2 Centre car park (Site 29)
- Draft Site Allocation – Policy WHI2 (O2 Centre building, car park and car showroom sites)
- Finchley Road / Swiss Cottage Town Centre
- Part of the Site includes Primary and Secondary Retail Frontages (the O2 Centre building along Finchley Road)
- Adjacent to a local Site of Importance for Nature Conservation Local (SINCL)
- Adjacent (north and south) to a habitat corridor.

West Hampstead Interchange – Growth Area

8.18 The whole of the Site, excluding the O2 Centre building, is located within the West Hampstead Interchange Growth Area as identified within LBC's Local Plan 2017. The Council expects **“developments in the area to contribute to:**

- **a mix of uses, including substantial new housing (including affordable housing), town centre, employment and community uses, and green / open space (with any substantial new town centre uses located within the designated Finchley Road / Swiss Cottage town centre part of the growth area);**
- **improved transport interchange accessibility and capacity and improved pedestrian and bicycle movement and routes;**
- **a substantially improved street environment around transport facilities, including improved crossing and wider pavements; and**

- **sustainable and safe design of the highest quality that respects the character and heritage value of West Hampstead; and**
- **prioritise the use of decentralised energy networks”.**

Camden’s Site Allocations (2013) – Site 29: O2 Centre Car Park

8.19 Part of the Site (the O2 Centre car park, excluding the O2 Centre building and the Homebase store) is allocated for development within Camden’s Site Allocation Document (2013). The Site allocation notes that the Site is suitable for **“an appropriate town centre mixed use development, including housing, retail, community uses and open space”**. It goes on to state that **“development will be expected to:**

- **Optimise the potential of the site to provide new housing (including affordable housing) while minimising potential conflicts between residential and other uses**
- **Ensure retail provision is appropriate in scale and would enhance the Finchley Road Town Centre and not detrimentally affect West Hampstead Town Centre**
- **Provide appropriate community facilities or services to meet residents needs**
- **Provide open spaces on site appropriate to the scale and nature of development proposed**
- **Positively contribute to and integrate with streetscape and interchange improvements along West End Lane**
- **Improve existing pedestrian conditions and provide legible and improved pedestrian / cycle links (including provision of cycle parking) between West End Lane and Finchley Road through new landscaping and good design, and introduce north-south pedestrian links**
- **Provide infrastructure for supporting local energy generation on site and/or connection to existing or future networks where feasible”.**

Fortune Green and West Hampstead Neighbourhood Plan (NP) (2015)

- 8.20 The Site falls within the area covered by the Fortune Green and West Hampstead Neighbourhood Plan which was adopted in March 2015. The Neighbourhood Plan (NP) (2015) sets out policies for the future development of the area between 2015 and 2031. The NP forms part of the Statutory Development Plan and accordingly the policies contained within the NP carry equal weight to those of the London Plan and LBC's Local Plan and have been assessed as such within this Town Planning Statement.
- 8.21 Within the NP, the majority of the Site, excluding the O2 Centre building, falls within the West Hampstead Growth Area. The NP identifies that this area **“shall be promoted for a mix of uses, including new housing, employment, town centre and public/community uses”**.

Other Material Considerations

- 8.22 Other relevant LBC Supplementary and Design Guidance Documents of relevance to this application are as follows:

Camden Supplementary Planning Documents

West End Lane to Finchley Road SPD

- 8.23 The West End Lane to Finchley Road SPD was adopted in September 2021. The focus of this planning guidance document is the land and sites stretching from Finchley Road Town Centre to the east through Blackburn Road to West End Lane. This includes the O2 Centre, its associated car park, Homebase retail store and neighbouring Audi/VW car showroom and Builders Merchants sites. The SPD identifies that there is a major opportunity for comprehensive redevelopment of this land to create a new place.
- 8.24 The key objectives for this area, as set out within the SPD, are as follows:

- i. An integrated and comprehensive approach that would deliver a range of public benefits and local priorities;
- ii. The delivery of new homes for people at all stages of life, including affordable homes;
- iii. The creation of a strong and vibrant shopping centre to meet the needs of local communities in terms of retail, leisure, cafes/restaurants and workspace while creating sustainable employment opportunities;
- iv. Improved connectivity between two distinct communities and two public transport nodes for pedestrians and cyclists;
- v. A substantially improved street environment with high quality landscaping;
- vi. A sustainable and safe design of the highest quality that respects the character and heritage value of West Hampstead;
- vii. New green/open spaces including a linear park, integrated children's play facilities and urban greening;
- viii. Space for community facilities including a new health centre;
- ix. A car free development (with the exception of blue badge spaces); and
- x. Building strong and lasting partnerships to ensure a coordinated approach to development and delivery.

Camden Planning Guidance Documents

8.25 The following Camden Planning Guidance Documents are relevant to the proposed development:

- Access for All (March 2019);
- Air Quality (January 2021);
- Amenity (January 2021);
- Basements (January 2021);
- Biodiversity (March 2018);
- Community Uses, Leisure and Pubs (January 2021);
- Design (January 2021);
- Developer Contribution (March 2019);
- Employment Sites and Business Premises (January 2021);
- Energy Efficiency and Adaptation (January 2021);
- Housing (January 2021);

- Planning for Health and Wellbeing (January 2021);
- Public Open Space (January 2021);
- Town Centres and Retail (January 2021);
- Transport (January 2021); and
- Water and Flooding (March 2019).

8.26 The following GLA documents are also material considerations:

Supplementary Planning Documents

- Planning for Equality and Diversity in London (October 2007);
- Character and Context (June 2014);
- Public London Charter (October 2021);
- Housing (March 2016);
- Play and Informal Recreation (September 2012);
- Social Infrastructure (May 2015);
- London View Management Framework (March 2012);
- All London Green Grid (March 2012);
- Affordable Housing and Viability (August 2017);
- Accessible London (draft) (April 2014); and
- The Control of Dust and Emissions during Construction and Demolition (July 2014).

8.27 The GLA currently has various supplementary planning documents in draft. Consideration has been given to these documents in the assessment of the scheme:

- Air Quality Positive (consultation draft March 2021);
- Air Quality Neutral (consultation draft November 2021);
- Fire Safety (consultation draft March 2021);
- Good Quality Homes for All Londoners (consultation draft October 2020);
- Be Seen Energy Monitoring (consultation draft September 2021);
- Sustainable Transport, Walking and Cycling (consultation draft September 2021);
- Urban Greening Factor (consultation draft September 2021);
- Circular Economy Statements (consultation draft October 2020);

- Energy Planning Guidance (consultation draft April 2020); and
- Whole Life Carbon Assessments (consultation draft October 2020).

Emerging Planning Policy

Site Allocations Local Plan Update

- 8.28 LBC first consulted on their draft Site Allocations Local Plan (SALP) between 13 February and 27 March 2020. A second round of consultation was undertaken between 30 November 2021 and 24 January 2022 to reflect national, regional and neighbourhood level planning changes. A publication draft would then be consulted upon before the SALP is submitted to the Secretary of State for an Examination in Public (EiP). Adoption is not anticipated until 2023. The emerging SALP builds on the Council's existing adopted policies and sets out how the Council expects key development areas and sites in the borough to be developed.
- 8.29 Within the consultation draft SALP, the Site, excluding the Builders' Merchants, falls within the West Hampstead Interchange Area (WH12). The draft Site Allocation identifies that **“the O2, car park and car showrooms site is allocated for comprehensive residential led development that provides a mix of uses including permanent self-contained homes, complementary commercial and town centres uses including retail and health/community facilities”**.
- 8.30 Whilst this draft Plan is still at an early stage, and currently limited weight can therefore be given to it, the aspirations of the draft SALP have been taken into account in the assessment of the proposals.

Legislative Framework

- 8.31 Given the Site's location adjacent to a number of conservation areas (CAs), namely South Hampstead CA to the south, Fitzjohns Netherhall CA to the east and West End Green CA to the north-west, statute regarding the historic environment is relevant.

8.32 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Key Planning Considerations

8.33 The development proposals have been assessed against the following principal planning matters:

- Land Use;
- Residential Design;
- Design, Bulk and Massing;
- Heritage, Townscape and Views;
- Landscape and Public Realm;
- Environment and Sustainability;
- Transport, Servicing and Waste; and
- Other Technical Considerations.

8.34 In the following sections of the Planning Statement, we address each of the key planning considerations noted above, in addition to other policy considerations, having regard to the Development Plan as a whole, and any wider material considerations.

9 Land Use

9.1 This section assesses the proposed land uses and their acceptability, in principle, in planning policy terms. It concludes that the proposed mix of uses is acceptable in land use terms and that the uses are of an appropriate scale and balance in line with relevant planning policies and objectives.

9.2 The land use section of this Town Planning Statement is structured as follows:

1. Principle of Development
2. Mixed Use Development
3. Residential
4. Town Centre Uses
 - a) Retail
 - b) Office
 - c) Maker Space
 - d) Cinema
 - e) Indoor Sport and Recreation
 - f) Cafes, Restaurants, and Pub/Drinking Establishment
5. Social Infrastructure – Community Facilities, Creche and Health Centre
6. Meanwhile Uses

Principle of Development

9.3 At the heart of the NPPF is a presumption in favour of sustainable development which meets social, economic and environmental needs. In doing so, planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land.

9.4 Paragraph 118 of the NPPF states that **“planning policies and decisions should encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains”**.

It goes on to state that **“planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs...”**. It states that **“planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help meet identified needs for housing where land supply is constrained, and available sites could be used more effectively”**.

- 9.5 Policy GG1 of the London Plan states that good growth is inclusive growth and seeks to build on the City’s tradition of openness, diversity and equality, to help deliver strong and inclusive communities.
- 9.6 Policy GG2 of the London Plan seeks to make the best use of land. It states that to create successful sustainable mixed-use places that make the best use of land, development must enable the development of brownfield land, and sites within and on the edge of town centres, prioritise sites which are well-connected by existing or planned public transport, proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, applying a design-led approach to determine the optimum development capacity of sites.
- 9.7 Policy GG4 of the London Plan states that to create a housing market that works better for all Londoners, development must ensure homes are delivered, support delivery of the strategic target of 50% affordable housing, create mixed and inclusive communities, identify and allocate a range of sites for housing and establish ambitious and achievable build out rates at the planning stage.
- 9.8 There are parts of London where the impacts of inequality and causes of deprivation are particularly concentrated. Based on the Index of Multiple Deprivation (IMD), many of the city’s neighbourhoods lie within the 20 per cent most deprived areas in England. These areas are defined in the London Plan as ‘Strategic Areas for Regeneration’. The Site is identified as being located within the Swiss Cottage / Finchley Road Strategic Area for Regeneration within the London Plan.

- 9.9 LBC’s Local Plan (2017) identifies West Hampstead Interchange as one of the Growth Areas of Camden where the most significant growth is expected to be concentrated.¹⁵
- 9.10 A series of priorities are set out for the West Hampstead Interchange¹⁶. In respect of land use this includes a mix of uses, including substantial new housing (including affordable housing), town centre uses within the designated Finchley Road/Swiss Cottage town centre).
- 9.11 Policy G1 of LBC’s Local Plan states that **“the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by [inter alia] supporting development that makes best use of its site, taking in account quality of design, its surroundings, sustainability, amenity, heritage, transport, accessibility and any other considerations relevant to the site”**.
- 9.12 Policy 4 of the Fortune Green and West Hampstead NP states that **“the West Hampstead Growth Area (WHGA)...shall be promoted for a mix of uses, including new housing, employment, town centre and public/community uses”**.
- 9.13 Site Allocation 29 (O2 Centre car park) within LBC’s Site Allocations Local Development Document (2013) identifies the car park, that forms part of the Site (1.35 hectares), for town centre mixed use development, including housing, retail, community uses, and open space.
- 9.14 Site Allocation draft Policy WHI2 (O2 Centre, car park and car showroom sites) within the Draft LBC SALP (February 2020) covers the proposed Application Site, excluding the Builders’ Merchant. It identifies a mixture of self-contained homes (indicative capacity 950), town centre uses, community uses, and open space. It states that it is not anticipated that the O2 Centre itself will be redeveloped.

¹⁵ Camden Local Plan (2017) Policy G1

¹⁶ Camden Local Plan (2017) paragraph 2.39.

9.15 The West End Lane to Finchley Road SPD (September 2021) sets out a series of key objectives for this area, are as follows:

- An integrated and comprehensive approach that would deliver a range of public benefits and local priorities;
- The delivery of new homes for people at all stages of life, including affordable homes;
- The creation of a strong and vibrant shopping centre to meet the needs of local communities in terms of retail, leisure, cafes/restaurants and workspace while creating sustainable employment opportunities;
- Improved connectivity between two distinct communities, Finchley Road and West Hampstead, and their associated train/rail connections, through the provision of a direct and attractive east-west walking route through a new neighbourhood;
- A substantially improved street environment with high quality landscaping which integrates with and facilitates landscaping proposals which may emerge on adjacent sites to create a coherent public realm;
- A sustainable and safe design of the highest quality that respects the character and heritage value of West Hampstead;
- New green/open spaces including a linear park, integrated children’s play facilities and urban greening;
- Space for community facilities including a new health centre;
- A car free development (with the exception of blue badge spaces); and
- Building strong and lasting partnerships to ensure a coordinated approach to development and delivery.

9.16 The SPD under the objective of “a sustainable and resilient place” provides the points to be considered where substantial demolition is proposed. It provides that substantial demolition and reconstruction should be fully justified in terms of the consideration of feasible and viable alternatives and optimisation of resources and energy use, in comparison with existing buildings, through a whole life carbon assessment.

9.17 It is acknowledged in the SPD¹⁷ that redevelopment of the O2 centre as part of a comprehensive approach would be more likely to support delivery of the principal objectives¹⁸ and opportunities:

A. Objectives

- i. Support strong, inclusive and sustainable economic renewal and enhance the vibrancy of Finchley Road as a town centre and local high street;
- ii. Successfully unlock a “backland” area that integrates with the town centre and facilitates direct and attractive pedestrian and cycle friendly routes through a new neighbourhood to West End Lane;
- iii. Provide a community asset of an inclusive and convenient place to meet and socialise;
- iv. Make access, entrances and routes into and from development inviting, attractive and interesting – to draw people through to new uses, spaces and facilities; and
- v. Using “Healthy Street” principles, work with TfL to significantly improve the pedestrian and streetscape quality of this part of Finchley Road, not only as a route linking Finchley Road Underground and Finchley Road & Frognal Overground Stations, but to enhance the town centre’s environment for pedestrians and bus users e.g. through greening, wider pavements, space around bus stops.

B. Opportunities:

- i. Create a modern, flexible and adaptable retail and leisure environment that adequately re-provides the type of uses that local people value and is designed for the high street of the future;
- ii. Create a new set back building line to increase pavement width and introduce tree planting along Finchley Road;

¹⁷ West End Lane to Finchley Road Principles for a new place (September 2021) page 20,

¹⁸ West End Lane to Finchley Road Principles for a new place (September 2021) page 20,

- iii. Form more accessible level changes on Finchley Road into and from new development
- iv. Provide new routes to create a more permeable place and that align with movement choices and destinations (e.g. enhanced and new road crossings, public transport and other shops and facilities);
- v. Locate high quality activated public spaces and routes closer to Finchley Road that look onto and contribute to the vitality of the high street; and
- vi. Introduce new retail frontages on Finchley Road designed to respond more appropriately to the adjacent terrace and prevailing high street townscape.

Assessment

- 9.18 The proposals are for the comprehensive, mixed-use, redevelopment of a brownfield site, well served by public transport. The eastern and central parts of the Site are located within the Finchley Road Town Centre and the whole Site (excluding the O2 Centre building) is within the West Hampstead Growth Area, an extract of Camden’s Policies Map showing these designations is included in Appendix B. The Site is earmarked for development within both Camden’s adopted and emerging Site Allocations, and within the recently adopted West End Lane to Finchley Road SPD.
- 9.19 The proposals would substantially intensify the use of the Site to provide a significant number of new homes (including affordable housing), complementary town centre uses, community uses and open spaces, through a design led, high density development that accords with the policy objectives set out in the adopted Local Plan.
- 9.20 The demolition of the existing buildings on the Site, including the O2 Centre, has been assessed against the policy requirements set out in London Plan Policy SI7 and those policy objectives set out in the Site SPD¹⁹. It is demonstrated in the following chapters that the Proposed Development meets the objectives and opportunities set out in paragraph 9.17 of this Statement.

¹⁹ See Paragraphs 14.41-14.52 of this Statement which sets out the findings of the Whole Life Carbon Assessment and Circular Economy reports.

9.21 The Proposed Development would deliver intensification of a currently underutilised Site within an identified growth area, optimising the Site for the delivery of new housing. The proposals for the comprehensive redevelopment of the Site would open up substantial opportunities to reshape and enhance the attractiveness and accessibility of the shopping, recreational, employment and community offer to existing and future residents, whilst creating a new, green, place for all within the heart of Camden. Accordingly, the principle of the comprehensive redevelopment of this Site for high density residential led mixed use is supported by planning policy at all levels.

Mixed Use Development

9.22 Promoting mixed-use development is one of the core principles of the NPPF, which suggests at Paragraph 92 (a) that mixed use developments can promote social interaction.

9.23 Chapter 11 of the NPPF seeks to promote the effective use of land in meeting the needs for homes as well as other uses. Paragraph 120 sets out that planning decisions should encourage multiple benefits from mixed-use schemes whilst also giving substantial weight to suitable brownfield land.

9.24 Policy GG2 of The London Plan seeks to promote mixed-use development on brownfield land, prioritising sites which are well-connected by existing or planned public transport. In addition, a development should **“proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”**.

9.25 Policy H1 of the Local Plan sets out that self-contained housing is the priority land use across the Borough.

9.26 Policy H2 of the Local Plan states that where non-residential development is proposed the Council will promote and encourage the inclusion of self-contained homes as part of a mix of uses in all parts of the Borough.

9.27 Policy H2 goes on to state that the Council will seek to achieve commensurate levels of self-contained housing whenever non-residential development is proposed to ensure a balance of uses across the Borough. The policy requires that where more than 200 sq m GIA of non-residential development is proposed in the Central London Area and town centres of Camden Town, Finchley Road / Swiss Cottage and Kilburn High Road, 50% of the additional floorspace would be required to be delivered as self-contained housing with an appropriate mix, including affordable housing where relevant.

9.28 Policy H2 states that when considering whether self-contained housing is required as part of a mix of uses the Council will take into account:

- “a) the character of the development, the site and the area;**
- b) site size, and any constraints on developing the site for a mix of uses;**
- c) the priority the Local Plan gives to the jewellery sector in the Hatton Garden area;**
- d) whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses;**
- e) whether the development is publicly funded or serves a public purpose;**
- f) the need to add to community safety by providing an active street frontage and natural surveillance;**
- g) the extent of any additional floorspace needed for an existing user;**
- h) the impact of a mix of uses on the efficiency and overall quantum of development;**
- i) the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and**
- j) whether an alternative approach could better meet the objectives of this policy and the Local Plan”.**

- 9.29 Policy 12 of the Fortune Green and West Hampstead NP states that **“development of commercial and mixed use premises and sites shall promote economic growth and development, where viable and appropriate”**.
- 9.30 Paragraph B8 of the Fortune Green and West Hampstead NP states that despite the constraints of the Site, **“there are considerable opportunities for a significant redevelopment of this site”** which it is noted could include expansion of the O2 Centre, moving the Homebase store, incorporating the sites currently occupied by the car showrooms, investigating the possibility of building over the railway lines.
- 9.31 Site Allocation 29 states that the Site is suitable for **“an appropriate town centre mixed use development including housing, retail, community uses and open space”**. Similarly, Camden draft Site Allocation for the West Hampstead Interchange Area identifies the Site WHI2 as suitable for a mixture of types of permanent self-contained homes, town centre uses, community uses and open space.

Assessment

- 9.32 The proposals are for the residential-led, mixed-use, comprehensive redevelopment of the Site seeking to create multiple benefits from the redevelopment of this brownfield land. Together, the Outline and Detailed proposals would create around 1,800 residential units across the Site as well as a mix of complementary town centre uses, community uses and public and a significant quantum of publicly accessible open spaces.
- 9.33 Whilst mixed-use development is important, Camden’s priority use within the Borough is housing. Furthermore, in both the adopted and emerging Site Allocations, and the recently adopted West End Lane to Finchley Road SPD the Site is earmarked for the delivery of a significant quantum of housing.
- 9.34 In this context, the total residential floorspace across the Site, including both Outline and Detailed Proposals, and residential parking podiums, could be up to 170,180 sq m GIA (with a maximum total of 189,863 sq m GIA across all uses). Accordingly, the proposed

residential floorspace equates to approximately 90% of the total floorspace that would be delivered which significantly exceeds the 50% required by policy.

9.35 In addition to the residential floorspace proposed, the Proposed Development also incorporates a range of complementary town centre uses including retail, office, maker space, cinema, indoor sport and recreation, food and drink and pub/drinking establishment uses. Community uses in the form of a creche, and health centre are also proposed.

9.36 Accordingly, the proposals would provide for a genuine sustainable mix of uses on the Site whilst providing a significant quantum of housing to meet national, regional and local planning policy objectives and aligning with both the adopted and emerging Allocations for the Site. The Site is located within a highly accessible location within LBC and within an identified Growth Area. Accordingly, the provision of a high-density development in this location is considered appropriate.

Residential

9.37 The Government's strategic objective as set out in the NPPF is to deliver a wide choice of high-quality homes and create sustainable, inclusive and mixed communities.

9.38 Chapter 5 of the NPPF supports the Government's objective of significantly boosting the supply of homes. Local planning authorities should plan for a mix of housing based on current and future demographic trends. They should also identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

9.39 Policy GG1 of the London Plan focuses on building strong and inclusive communities, making the best use of land to allow the city to grow in a way that works for everyone.

9.40 Policy GG4 identifies the need for development to create a housing market that works better for all Londoners. To achieve this, those involved in planning and development must, amongst other things, ensure that more homes are delivered, support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable, and

create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs.

- 9.41 London Plan Policy H1 sets out the requirements for boroughs to achieve the increased housing supply targets set out in Table 4.1, which identifies a ten-year housing completion target of 10,380 for LBC [2019/20 to 2028/29].

- 9.42 Policy H1 Part B (2) identifies that to ensure that ten-year housing targets are achieved, boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through Development Plans and planning decisions especially the mixed-use redevelopment of car parks and low-density retail parks and supermarkets.

- 9.43 Policy H4 (Delivering Affordable Housing) states that the strategic target is for 50% of all new homes to be affordable. Specifically, it requires major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach (Policy H5) using grant to increase affordable housing delivery beyond the level that would otherwise be provided.

- 9.44 Policy H5 (Threshold Approach to Applications) confirms that privately owned sites providing 35% or more Affordable Housing are not required to follow the viability tested route.

- 9.45 Policy H6 sets out the Mayor's affordable housing tenure mix. Specifically, it states 30% of the affordable homes should be low-cost rent (London Affordable Rent or Social Rent) 30% Intermediate and 40% to be agreed with the borough based on identified need.

- 9.46 London Plan Policy SD7 Part C (6) sets out that boroughs should identify sites for higher density mixed-use residential intensification capitalising on the availability of services within walking and cycling distance and current and future public transport provision including, for example comprehensive redevelopment of surface car parks.

- 9.47 Policy H1 of the Camden Local Plan sets out that self-contained housing is the priority land use across the Borough. LBC aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and

exceeding a target of 16,800 additional homes from 2016/17 – 2030/31 (equating to 1,120 homes per year), including 11,130 additional self-contained homes.

- 9.48 Policy H2 of the Camden Local Plan indicates that the Council will encourage the inclusion of self-contained homes in non-residential development in all parts of the borough. LBC require 50% of additional floorspace to be self-contained housing in development involving more than 200sqm (GIA) additional floorspace in the Central London Area and the larger town centres. Self-contained housing should be provided on the development site, particularly where 1,000sqm (GIA) or more of additional floorspace is proposed.
- 9.49 Policy 4 of the Fortune Green and West Hampstead NP states that the West Hampstead Growth Area shall “**provide new homes – including affordable homes and homes suitable for families**”. Paragraph B8.a of the NP states that “**the primary use [of the Site] should be for additional housing, including affordable housing**”.
- 9.50 Policy 1 of the NP states that “**residential development shall provide a range of housing types, to meet a range of needs, as appropriate, related to the scale of development**”.
- 9.51 Both the adopted and emerging Site Allocations identify that the Site has the potential to provide new housing, to help meet policy objectives. The West End Lane to Finchley Road SPD identifies the priorities for the Site include “**a mix of uses, including substantial new housing (including affordable housing)**”.

Assessment

- 9.52 The Detailed Proposals would include a total of 55,180sq. m GIA of residential (including car parking in the podium). This equates to 608 new dwellings.
- 9.53 The Outline Proposals would include up to 115,500 sq m GIA of residential (Class C3) floorspace. Therefore, the total residential use across the Site, including residential parking in podiums could be up to 170,180sq. m GIA (which for the sake of the

Environmental Impact Assessment is assumed to equate to around 1,800 residential units).

- 9.54 It is noted that the Council did not deliver sufficient housing over the period of 2016/17 to 2018/19, granting permission for 2,794 residential units which equated to 83% of its annual housing target across the same period. As a result, the Council was required by MHCLG to produce a housing delivery action plan. In addition, the housing targets for Camden, as identified within the emerging London Plan, increased by 22% to deliver 10,380 new dwellings over a ten-year period. The acute need for additional housing, across all tenures and unit sizes within the London Borough of Camden (and London as whole), should be given significant material consideration and weight in the assessment of this application.
- 9.55 The Housing Delivery Test 2020 identified a housing requirement for the LBC of 3,265 homes between 2017-2020. However, LBC only delivered 2,568 within this period, equating to a 79% delivery rate. As such, the consequence of this shortfall results in a buffer of 20% being added to the housing target.
- 9.56 The proposals seek to provide a mix of housing types including studio, 1, 2 and 3+ bedroom units, of which a minimum of 35% by floorspace (GIA) would be delivered as genuinely affordable homes.
- 9.57 The Site represents one of the largest underutilised low density sites in Zone 2 in London with a PTAL of 6a representing an opportunity to achieve wider community benefits and to deliver a significant quantum of homes and public realm.”
- 9.58 The Site is considered suitable for residential development on the basis that it is a brownfield site, is well served by public modes of transport and the central and eastern parts of the Site are located within the Finchley Road Town Centre.
- 9.59 Policy H1 of the London Plan specifically identifies that mixed-use redevelopment of car parks as a way of ensuring targets for the delivery of housing are achieved across London. The proposals would deliver a significant quantum (11%) of Camden’s total housing target between 2016/17 – 2030/31. Additionally, Policy SD7 of the London Plan

makes reference to identifying suitable sites such as comprehensive redevelopment of surface car parks for higher density mixed-use residential intensification.

- 9.60 Residential use on this Site is supported, and promoted, by planning policy at all levels. The London Plan identifies the Swiss Cottage/Finchley Town centres has high residential growth potential. The LBC adopted Site Allocations Development Plan Document (2013) states that Development at the Site will be expected to “*optimise the potential of the Site to provide new housing (including affordable housing)...*” Accordingly, the principle of a significant proportion of residential floorspace on the Site is supported in planning policy.

Affordable Housing

- 9.61 Section 5 of the NPPF, ‘Delivering a Sufficient Supply of Homes’, states that any scheme comprising 5 or more homes should provide affordable housing. It establishes that affordable housing should be delivered on-site. Annex 2 of the NPPF defines affordable housing as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers). It defines four types of affordable housing: Affordable Housing for rent; Starter homes; Discounted market sale housing; and other affordable routes to home ownership.
- 9.62 Paragraph 62 of the NPPF sets out that the context, size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
- 9.63 The National Planning Policy Guidance confirms that housing need is an unconstrained assessment of the number of homes needed in an area (ID: 2a-001-20190220). It also confirms that all households whose needs are not met by the market can be considered in affordable housing need (ID: 2a-018-20190220).
- 9.64 London Plan Policy H1, titled ‘Increasing Housing Supply’, of the London Plan sets an overall housing target of 52,287 new homes every year compared to the previous 2016 London Plan target of 49,000. This target does not seek to meet the full objectively assessed need identified by the Strategic Housing Market Assessment (2017) of 66,000.

Table 4.1 of the London Plan provides a new housing target for LBC of 10,380 over the plan period (2019-2029).

- 9.65 London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 states that the threshold level of affordable housing is a minimum of 35%, or 50% for former industrial land and public sector land.
- 9.66 London Plan Policy H5 requires that major developments provide affordable housing through the threshold approach; and reaffirms that affordable housing should be provided on-site, with off-site / payment only in exceptional circumstances.
- 9.67 Policy H6 of the London Plan sets out a preferred tenure split of at least 30% low-cost rent (London Affordable Rent or Social Rent), at least 30% intermediate (with London Living Rent and shared ownership being the default tenures), and the remaining 40% to be determined by the local planning authority taking into account relevant Local Plan policy.
- 9.68 Policy H10 (Housing Size Mix) states that schemes should consist of a range of unit sizes having regard to several factors. The factors, that applicants and boroughs should take into account, are then further explained in supporting text at paragraph 4.10.2. It also states that in terms of delivering mixed and inclusive communities, a neighbourhood may currently have an over-concentration of a particular size of unit and a new development could help redress the balance.
- 9.69 In terms of Build to Rent, the LP (2021) confirms that Boroughs should take a positive approach to the Build to Rent sector to enable it to better contribute to the delivery of new homes (Paragraph 4.11.1 and 4.11.2).
- 9.70 LP Policy GG4 (Delivering the homes Londoners need) supports creating mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs.
- 9.71 The GLA's Affordable Housing and Viability SPG (August 2017), explains how the policies of the London Plan should be applied with the aim of half of all new homes to

be affordable. The SPG sets out the Threshold Approach to applications. Under the Threshold Approach, development proposals that provide 35 per cent affordable housing and 50 per cent on public and industrial land (where industrial floorspace capacity is not being re-provided in line with policy E7, Industrial Intensification, co-location and substitution), and that meet tenure, affordability and other relevant requirements, can follow the Fast-Track Route.

- 9.72 The SPG states that the Fast Track Route enables developments to progress without the need to submit detailed viability information and without late viability review mechanisms which re-assess viability at an advanced stage of the development process.
- 9.73 Local Plan Policy H4 states that LBC will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100 sq m or more.
- 9.74 Local Plan Policy H4 (a) states that the guideline mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing.
- 9.75 Local Plan Policy H4 (c) states that an affordable housing target of 50% applies to developments with a capacity for 25 or more additional dwellings.
- 9.76 Local Plan Policy H4 (h) states that for developments with capacity for 10 or more additional dwellings, the affordable housing should be provided on site.
- 9.77 Camden's Housing CPG (2021) provides specific guidance on both housing and affordable housing in mixed use development and specifically the requirements of Local Plan Policies H2, H4, and H6.

Assessment

- 9.78 The London Plan (2021) sets a strategic capacity limited target to deliver at least 26,244 affordable homes across London per annum (50%). The London Plan Annual Monitoring Report 16 (March 2021) indicated that the delivery of new affordable homes on a London

wide basis is significantly below the new London Plan Target with only 22% of the new target being achieved between 20016/17 and 2018/19.

- 9.79 The Proposed Development provides a significant quantum of affordable housing. In the Detailed Proposals, alone, 188 affordable homes would be delivered. This would represent 2% of the total affordable homes delivered across the whole of London in 2018/19. In the Detailed Proposals, the affordable housing would be accommodated in Plot N4.
- 9.80 Based on an indicative mix, the Outline Proposals²⁰ could provide around 566 new affordable homes which would equate to 42% of LBC annual affordable housing target.
- 9.81 The Proposed Development would provide around 1,800 new homes in Camden. This represents a significant percentage (17%) of Camden's 10 -Year Housing target²¹. Furthermore, around 630 (based on the illustrative masterplan at 35% of floorspace) affordable homes are provided which equates to 10% of Camden's housing waiting list.
- 9.82 In accordance with London Plan Policy H5, and the threshold approach to applications, the Detailed and Outline proposals include a minimum of 35% affordable housing by floorspace (GIA) and habitable room across the Proposed Development. The provision of 35% affordable housing is not contingent on the receipt of grant funding.
- 9.83 The level of affordable housing proposed accords with the London Plan threshold approach to affordable housing. Accordingly, there is no requirement to submit detailed viability information to the GLA.
- 9.84 However, Camden's strategic affordable housing target is 50% which the proposals fall short of. Accordingly, a Financial Viability Assessment (FVA) prepared by Gerald Eve LLP has been submitted in support of this Application which shows that 35% is the maximum reasonable level of affordable housing that can be provided.

²⁰ See Table 9 in the Development Specification document

²¹ As set out paragraph 1.11 of this Statement

- 9.85 The tenure split of the affordable housing would consist of Low-Cost Rent and Intermediate Rented Housing at a ratio of 60:40, by floorspace, in accordance with London Plan Policy H6 and Local Plan Policy H4. The Low-Cost Rent units are proposed to be let at London Affordable Rents or Social Rents. The intermediate Rent homes would target a range of incomes and would be prioritised to those who live or work in the borough.
- 9.86 The scheme proposes a mix of affordable housing unit sizes including 52% family sized (3 bedroom+) low-cost rent homes in the detailed element.
- 9.87 The provision of 60% of the affordable homes as Low-Cost Rent would make a significant contribution to meeting the priority needs of low-income households including vulnerable households (there are presently over 7,000 households on the council's waiting list, ONS 2021). This is a significant benefit noting the scheme is anticipated to be Build-to-Rent and is therefore not required to provide any low cost rented homes by national or regional policy.
- 9.88 The proposed mix will make an important contribution to meeting unmet needs of overcrowded low cost rented households (19.3% of LBC households, Census 2011) and the needs of households on the Council's Intermediate Housing Register. The proposed mix also supports the viability of the scheme and the quantum of Affordable Housing that can be provided.
- 9.89 The proposed intermediate homes would meet the growing needs of 'squeezed middle' households who cannot afford to buy or rent a good quality suitable home locally but would also be very unlikely to be allocated an existing low-cost rent home (e.g key frontline workers).
- 9.90 With regards to unit mix, and in accordance with Camden's Dwelling Size Priority Table (see Table 9.1 below) a minimum of 50% of the Low-Cost Rented housing would be family sized, three-bedroom units in the Detailed Proposals. The Development Specification document secures a range of between 45-50% of the Low-Cost Rented housing as three-bedroom units in the Outline Proposals.

Type of Housing	Private	Low-Cost Rent	Intermediate Rent
Studio	59 (14%)	0	0
1 bedroom	157 (37%)	14 (13%)	48 (57%)
2 bedroom	187 (45%)	36 (35%)	25 (30%)
3 bedroom	17 (4%)	54 (52%)	11 (13%)

Table 9.1: Detailed Proposals Unit Mix by tenure

Type of Housing	Private	Low-Cost Rent	Intermediate Rent
	Percentage	Percentage	Percentage
Studio	0-20%	0-5%	0-20%
1 bedroom	0-40%	0-25%	0-30%
2 bedroom	30-50%	20-25%	20-40%
3 bedroom	0-5%	45-50%	0-15%

Table 9.2: Outline Proposals Illustrative Unit Mix by tenure (% range)

9.91 The affordable housing has been distributed across the Site to provide a mixed and balanced community. The scheme would be phased to ensure that the affordable housing is delivered in proportion with the market housing at the relevant stage in the construction, and it is anticipated that this would be secured by Section 106 obligation.

9.92 All homes have been designed so they are tenure blind and meet or exceed the design standard set out in the Development Plan. All entrances would be an equal quality across all tenures. It is intended that the affordable housing forming part of the scheme would be managed by a Registered Provider (RP). Detail on discussions between the Applicant and RP's is set out in the accompanying Affordable Housing Statement.

9.93 The proposed quantum and configuration of affordable housing that forms part of the Proposed Development is appropriate for this Site, in accordance with the relevant planning policies at all levels. Whilst the Proposed Development does not meet the LBC strategic target of 50% affordable housing, the Applicant has demonstrated that 35% by floorspace is the maximum reasonable. The Proposed Development is, in respect of affordable housing, in accordance with the planning policy objectives at all levels.

Town Centre Uses and Employment

9.94 At paragraph 86 the NPPF states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. It goes on to state that main town centre uses should be located in town centres but also states that planning policies should recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

9.95 Policy SD7 of the London Plan states that **“when considering development proposals, boroughs should take a town centres first approach”**. The sequential test should be applied for main town centre uses, requiring them to be located in town centres. It goes on to state that **“Boroughs should support the town centres first approach in their Development Plans”** and **“identify centres that have particular scope to accommodate new commercial development and higher density housing...Criteria to consider in assessing the potential for intensification in town centres include:**

- a) assessments of demand for retail, office and other commercial uses**
- b) assessments of capacity for additional housing**
- c) public transport accessibility and capacity**

- d) **planned or potential transport improvements – to indicate future capacity for intensification**
- e) **capacity and proximity of social infrastructure**
- f) **existing and potential level of density of development and activity**
- g) **relationship with wider regeneration initiatives**
- h) **vacant land and floorspace – as a further measure of demand and also of under-utilisation of the existing centre**
- i) **potential to complement local character, existing heritage assets and improve the quality of the town centre environment viability of development”.**

9.96 Policy SD7 of the London Plan goes on to state that Boroughs should “**identify sites suitable for higher density mixed-use residential intensification capitalising on the availability of services within walking and cycle distance and future public transport provision including, for example:**

- a) **comprehensive redevelopment of low-density supermarket sites, surface car parks, and edge-of-centre retail/leisure parks**
- b) **redevelopment of town centre shopping frontages that are surplus to demand**
- c) **redevelopment of other low-density town centre buildings that are not of heritage value, particularly where there is under-used space on upper floors, whilst re-providing non-residential uses**
- d) **delivering residential above existing commercial, social infrastructure and transport infrastructure uses or re-providing these uses as part of a mixed-use development.**

9.97 It goes on to state that “**development proposals should:**

1. **ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment**
2. **ensure that commercial space is appropriately located having regard to Part A and B above, and is fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing**

3. **support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents**
4. **support the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments”.**

9.98 Policy TC2 of Camden’s Local Plan states that the Council will **“promote successful and vibrant centres throughout the borough to serve the needs of residents, workers and visitors. We will:**

- a) **seek to protect and enhance the role and unique character of each of Camden’s centres, ensuring that new development is of an appropriate scale and character for the centre in which it is located**
- b) **provide for and maintain a range of shops including independent shops, services, food, drink and entertainment and other suitable uses to provide variety, vibrancy, and choice**
- c) **make sure that food, drink, entertainment, and other town centre uses do not have a harmful impact on residents and the local area...**
- e) **pursue the individual planning objectives for each centre, as set out in supplementary planning document CPG on town centres and retail, and through the delivery of environmental, design, transport and public safety measures”.**

9.99 Policy TC2 goes on to state that the Council **“has designated primary and secondary frontages in its centres, which are shown on the Local Plan Policies Map. We will:**

- f) **Protect the primary frontages as locations with a high proportion of shops (A1) in order to maintain the retail function of the centre; and**
- g) **Protect the secondary frontages as locations for shops (A1) together with a broader range of other town centre uses to create centres with a range of shops, services, and food, drink and entertainment uses which support the viability and vitality of the centre”.**

- 9.100 Policy TC2 also states that **“the Council supports the development of housing within centres and Central London including above and below shops where this does not prejudice the town centre function and particularly the ability of the ground floor to be used for town centre uses”**.
- 9.101 Policy TC4 of Camden’s Local Plan states that **“the Council will ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre, the local area or the amenity of neighbours”**. To manage any potential harm to amenity or the local area, the Council would use planning conditions and obligations.
- 9.102 Policy 13 of the Fortune Green and West Hampstead NP states that **“development should preserve or enhance the village character of the Town Centre as a mixed retail area with a diverse range of shops and businesses”**. It goes on to state that this would be achieved by a presumption in favour of preserving or enhancing the character of the Town Centre, increasing the range of retail outlets, food/drink outlets and commercial premises, and support for development of small/independent shops and businesses, including affordable space.

Assessment

- 9.103 A large proportion of the Site is located within the Finchley Road / Swiss Cottage Town Centre. Accordingly, the inclusion and re-provision of Town Centre uses in the redevelopment of the Site have been considered in detail by the Applicant.
- 9.104 The O2 Centre itself is an outdated and inward-looking development with the Centre and Homebase set in a sea of parking. It presents a wall to the Town Centre and has little functional connection with the wider centre or local area. The O2 has high vacancy rates, particularly for food and drink and comparison shopping and a small number of large units dependent on car access. The Homebase store is due to close in 2022. The car showrooms and Builders Merchant in the west of the Site are also ‘Big Box’ type uses.

9.105 The uses on the O2 Masterplan Site are not integrated into the Town Centres. As customers come to the Site by car, and leave by car, there is little in the way of linked trips²² (the Site is dominated by single transaction trips).

9.106 The O2 Centre for the purposes of Table 9.3 below, largely consists of three units – Sainsburys, Virgin Active and Vue – which make up 85% of the floorspace within the O2 Centre. Furthermore, whilst the O2 Centre makes a significant contribution in floorspace terms to the Finchley Road Town Centre, the current provision is heavily weighted towards leisure (cinema and gym) and large-scale big box retail shops. Consequently, the existing O2 Centre makes very limited wider contribution to vitality, viability and quality of the Town Centre with no provision for independents/creative businesses and very limited retail offer other than large scale stores including Waterstones.

9.107 Table 9.3 sets out the O2 Centre Current Lettable Areas and Occupancy

Use	Description	Area	% of Total O2	Vacant	Rate
Sainsbury	Sainsbury's Supermarket and Argos	7,558	30%	-	-
Vue Cinema	12 Screen Cinema	4,340	17%	-	-
Virgin Active	Private Gym with Pool	5,243	21%		

²² See Regeneration and Community Benefits Statement (January 2022)

A1 Retail (now Class E,a)	7 units including vacant former Habitat	3,189	13%	1,068	33%
Food and Drink	15 units including, 8 Vacant units	3,481	14%	2,630	76%
Other	4 Units, nursery and community	1,063	4%	579	54%
Total		24,875		4,277	17%

Source: Landsec

Table 9.3 O2 Centre Current Lettable Areas and Occupancy (sqm)

- 9.108 The Homebase store on the Site is a standalone building of approximately 4,000 sqm. Homebase entered a Company Voluntary Agreement with its creditors in 2018 and the store is due to close in 2022.
- 9.109 The two Car Showrooms at the east of the Site are not located in the Town Centre or Town Centre uses. Like the Homebase they are ‘big box’ sheds set in a sea of car parking and hard standing. Again, buildings only cover around a third of that part of the Site (0.4 ha of 1.2 ha) with the remainder being roads and parking.
- 9.110 The Builders Merchants occupies a narrow strip against the railway line and is made up of single storey sheds and external storage and hardstanding. It is on the part of the Site which forms the gateway to West Hampstead Town Centre which extends to the frontage the West End Lane.

9.111 The Proposed Development would provide 19,682sq. m of town centre uses across the O2 Masterplan Site. A summary of the existing Town Centre uses within the O2 compared with those proposed across the O2 Masterplan Site, are set out in table 9.4 below:

Existing GIA sq m	Maximum Proposed GIA sq m	Net change GIA sq m
24,875 sq m ²³ (entire O2 Centre)	19,682 ²⁴	-5193sq. m
20,598 sq m (O2 Centre excluding vacant areas)	19,682	-916sq. m

Table 9.4: Existing and Proposed Town Centre Uses within the O2 Centre

9.112 The proposals include 19,682 sqm of non-residential floorspace, 76% (14,250sq. m) of which is in the outline (east) part of the development where the O2 centre currently is and within Finchley Road and Swiss Cottage Town Centre. It is envisaged that part of the Town Centre would see the replacement of a large supermarket, cinema and gym, albeit in smaller and more efficient formats reflecting a car free development.

9.113 The proposals seek to manage the transition from a traditional 1990s shopping centre and inward-looking car serviced development, to a highly accessible, non-car serviced residential-led development supported by a vibrant and varied mix of Town Centre uses, which would contribute to the vitality and viability of both the Finchley Road and West Hampstead Town Centres.

9.114 Many shopping centres and high streets in the UK are on the decline as a result of changes in the way we live, and work, accelerated by the recent and ongoing Covid-19

²⁴ Town Centre floorspace for Development Plots S1,N1,N2 and N3 set out within Table 8 of the Development Specification document.

global pandemic. Traditional shopping centres, like the O2 Centre, no longer meet market demand. The O2 Centre has been designed to be inward looking, it has no windows and has convoluted access between levels. It was designed for a specific purpose and not designed to be flexible or take into account future needs. It is getting harder to let vacant shops and retailers and shoppers alike are eager to visit places that are more outward-facing and connect better to the surrounding area (this is evident with the closure and repositioning of major department stores which, like shopping centres, are designed to be inward looking). The Site is car-centric which, given the immediate access to public and sustainable forms of transport, does not meet policy objectives or address the climate emergency.

- 9.115 As set out in Regeneration and Community Benefits Statement prepared by Quod and submitted in support of this Application, the rise in online shopping is driving a change in the role of high street. There is a lot more pressure on bricks and mortar traders, particularly for comparison goods, with the online comparison goods share projected to grow from 20% (at present) to 30% (by 2040), with associated falling physical floorspace requirements.
- 9.116 The convenience market is anticipated to be broadly flat with growing online share driving overall retail growth. In parallel, London is seeing greater localisation and growth of successful specialist and niche centres which have seen a breaking of the barriers between traditional use classes e.g. independent maker/workshop spaces, which has been supported by a rise in home working, as a result of the pandemic, linked to higher local spending.
- 9.117 In light of this, landowners are considering ways in which historic retail centres can change and reinvent themselves to continue to be a focus point for the community. In doing so landowners are generally seeking to introduce flexibility and repurpose retail space to ensure that Town Centres remain sustainable in the long term and respond to market conditions by providing a mix of commercial uses that complement one another and add to the vitality and vibrancy of the Town Centre.
- 9.118 LBC have acknowledged the changes in consumer habits and the impacts on the high street and have commenced the LBC Future High Street programme seeking to support

LBC's high streets through the pandemic and into a robust recovery and re-imagined future. In doing so they have published LBC's Future High Streets (June 2021). This document fully supports the Applicant's aspirations for the Site, **“creating places for the community to come together to meet, shop, socialise, and exchange ideas, and to create opportunities to learn and experience new things”**. The proposals seek to reorientate and revitalise the Finchley Road Town Centre to ensure that it responds to the needs of the community as a place to build social value, provide variety and add to community life whilst integrating better into the existing Finchley Road Town Centre and encouraging connections with West Hampstead Town Centre.

- 9.119 The intention of the proposals is to maintain and consolidate the current economic role (jobs and business activity) of the Site through provision of a more diverse offer, specifically retail (including independent retail), leisure, food and drink, workspace (including affordable and maker space) and community provision. The new development would create a proper and open street frontage and squares that become part of the Town Centre, integrating with the range of new shops, services and facilities that are currently not on offer within the Town Centre. The intention is to provide for a greater footfall and linked trips (i.e. using more than just one of the services on offer) and encouraging people to sit and dwell in the area, away from the hostile traffic environment along Finchley Road.
- 9.120 A food store provision would be retained in the proposals, but the new provision would be much smaller in scale seeking to provide for local needs and non-car borne shopping trips, reflective of the Site's highly accessible location. The gym and cinema uses would also be re-provided but in a smaller format to reflect more modern models.
- 9.121 Notwithstanding the benefits of the proposals to the Town Centres, there would be a loss in Town Centre floorspace (as can be seen from Table 9.3 above). However, when the vacancy rate is taken into account the reduction only amounts to a loss of 916sq. m. The uplift in Retail (Class E,a) would allow for independent local businesses (unlike the current position which is predominantly 'big box' retail) and would therefore help the growth and health of the Town Centre.

9.122 The loss of Town Centre uses should be considered in the context of providing a much more sustainable Town Centre solution and mix of Town Centre uses than is currently the case, ensuring that the Site is able to contribute to the long-term health of the Finchley Road, and adjacent West Hampstead, Town Centres.

9.123 The O2 Masterplan Site – Existing Employment Summary (January 2022) is set out below:

Use	Jobs (FTE)	Full Time	Part Time
O2 Centre & Homebase (east)	424	269	310
Car showrooms (west)	30	-	-
Builders Merchant (west)	10	-	-
Total	464		

Source: Quod based on Landsec Survey and HCA Summary

Table 9.5: O2 Finchley Road - Existing Employment Summary, January 2022

9.124 As set out within the Regeneration and Community Benefits Statement the Proposed Development would provide between 545 and 758 Full time jobs in the completed development, an uplift of between 80 and nearly 300 on the current, on Site, employment.

9.125 Overall, whilst the Proposed Development would lead to a loss of Town Centre uses, the proposals seek to provide an appropriate quantum and balance of Town Centre uses to reflect future market trends as well as achieve a seamless east-west link through the Site whilst resulting in an uplift in employment at the Site.

9.126 We have provided a summary of the relevant planning policies of each Town Centre use and an assessment against each of these below.

a) Retail

9.127 London Plan Policy E9 states that **“a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported”** in line with the wider objectives of the Plan, particularly for town centres. Policy E9 goes on to state that **“Development Plans and development proposals should support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel”**.

9.128 Policy E9 of the London Plan also states that clusters of retail and associated uses will be managed **“having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including:**

- b) Town centre vitality, viability and diversity**
- c) Sustainability and accessibility**
- d) Place-making or local identity**
- e) Community safety or security**
- f) Mental and physical health and wellbeing”**.

9.129 Policy E9 also states that **“development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable...and residential development”**.

9.130 Policy TC1 of LBC’s Local Plan states that **“the Council will focus new shopping and related uses in Camden’s designated growth areas and existing centres, having regard to the level of capacity available in these locations.”** In terms of distribution of retail across Camden, this will be within Growth Areas, Town Centres, Central London Frontages and Neighbourhood Centres, specialist shopping areas, and small shops outside of centres. It states that **“retail floorspace is expected to be supported by a range of other town centre uses, including food, drink and entertainment uses”**.

9.131 Policy TC1 goes on to state that the Council **“will apply a sequential approach to retail and other town centre uses outside of the areas listed above to support Camden’s network of centres. Retail and other town centre uses should be located in designed centres. Only if suitable sites cannot be found within designated centres will the Council consider edge of centre locations or if no edge of centre locations are available, out of centre locations. The Council will require a retail impact assessment for large retail development proposals (of 2,500 sq m or more) that are not in accordance with the above approach and:**

- **Would be in an edge of centre or out of centre location; or**
- **Would be in an existing centre and have the potential to have a harmful impact on other centres”.**

9.132 Policy TC5 states that the Council will **“promote the provision of small shop premises suitable for small and independent businesses”**. In doing so, the Council will **“expect large retail development to include a proportion of smaller units, attach conditions to planning permissions for retail developments to remove their ability to combine units into larger premises, where appropriate, and encourage the occupation of shops by independent businesses and the provision of affordable premises”**.

9.133 Paragraph B8 of the Fortune Green and West Hampstead NP states that redevelopment of the Site could include **“an expansion of the O2 Centre to include additional retail, commercial and business use”**. It goes on to state that the key consideration for redevelopment of this Site is **“additional business, commercial and retail uses”**.

9.134 Policy 13 of the Fortune Green and West Hampstead NP states that development should preserve or enhance the village character of the Town Centre **“as a mixed retail area with a diverse range of shops and businesses”**. It states that this shall be achieved by, **“where appropriate, increasing the range of retail outlets, food/drink outlets and commercial premises”**.

9.135 Camden’s Town Centres and Retail CPG states that **“retail uses are important for ensuring Finchley Road / Swiss Cottage remains a viable shopping function to**

meet the needs of the local area”. It goes on to state that **“the Council seeks to protect the retail function and character of Finchley Road / Swiss Cottage. The Council will not grant planning permission for development which results in the proportion of ground floor premises falling below:**

- **75% in a primary frontage; and**
- **50% in a secondary frontage”**.

Assessment

9.136 The Detailed Proposals seek permission for 1,733sq. m GIA of retail floorspace. The Outline Proposals seek permission for a maximum of 5,460sq. m GIA of retail (Class E,a). Accordingly, the maximum retail floorspace that could come forward as a result of both the Outline and Detailed Proposals is up to 7,193sq. m GIA²⁵.

9.137 There would be a loss of retail floorspace across the O2 Masterplan Site as set out in Table 9.4 above however, this loss is mainly attributed to the Sainsbury’s and the Homebase store. These are both ‘big box’ retail units which do little to secure the long-term health of the town centre due to single transaction trips made using the cars²⁶.

9.138 The proposals are to re-provide a food store within the town centre plots²⁷. The commercially sustainable quantum of floorspace is largely driven by the provision of on-Site car parking and therefore the proposal is for a smaller scale provision than the existing Sainsburys. Positive discussions have been held with Sainsbury’s in relation to the re-provided food store. The proposals would still provide for the local neighbourhood need, whilst reflecting consumer trends (online shopping and convenience retail), a move away from car-based food shopping and reflective of the highly accessible location of the Site.

²⁵ Additional incidental and ancillary retail uses could occur within the public open space as set out in the interim uses chapter in the DAS. However, any incidental retail use would be small scale and additional permanent structure would be subject to separate planning applications.

²⁶ See Regeneration and Town Centre Report January 2022

²⁷ Plots S1,N1,N2,N3.

- 9.139 It is not intended to re-provide the existing Homebase DIY store which is due to close in 2022 following the 2018 CVA. The town centre location of the Site is not considered appropriate for a large-scale DIY store or ‘big box retail’ which is predominantly accessed by car. The proposals are to provide a more appropriate scale and mix of town centre uses, providing for local need and those accessing the Site by sustainable modes of transport in accordance with London Plan Policy E9.
- 9.140 The Proposed Development will remove the big box retail provision and instead provide flexible retail space that can be for small, and growing businesses, including local businesses. This is in accordance with LBC Local Plan Policy TC5.
- 9.141 The proposals seek to provide a sustainable level of high-quality retail space, complemented by a mix of other town centre uses, to protect and enhance Finchley Road Town Centre.
- 9.142 The proposed high-quality retail provision would add to the vitality and vibrancy of the Finchley Road and West Hampstead Town Centres, providing animation and enhancing the retail frontages of the Finchley Road Town Centre. Accordingly, it is considered that the proposals accord with London Plan Policy E9 LBC Local Plan Policies TC1 and TC5 and Policy 13 of the Fortune Green and West Hampstead NP.

b) Commercial, Business and Service (Class E,c) and Office (Class E,g)

- 9.143 The NPPF sets out the Government’s commitment to securing economic growth and advises that plans should support an economy fit for the twenty first century. Paragraph 81 of the NPPF states that [inter alia] **“significant weight should be placed on the need to support economic growth and productivity, taking into account wider opportunities for development”**.
- 9.144 Policy E1 (a) of the London Plan states that **“improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small and medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development”**.

- 9.145 Policy E1 (d) of the London Plan States that **“the diverse office markets in outer and inner London (outside the areas identified in Part C) should be consolidated and – where viable – extended, focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectively and capacity including...(2) other town centre office locations (having regard to the Town Centre Network office guidelines in Table A1.1 and Figure A1.4 in Annex 1)...(4) locally oriented, town centre office provision to meet local needs”**.
- 9.146 Policy E1 (g) of the London Plan states that **“development proposals related to new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace”**.
- 9.147 London Plan Policy E4 states that **“a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained...This should make provision for the varied operational requirements of light...industry”**.
- 9.148 LBC Local Plan Policy E1 explains that the Council will secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and business.
- 9.149 Policy E2 of LBC’s Plan states that the Council **“will encourage the provision of employment premises and sites in the borough”**. It goes on to state that the Council will consider **“high intensity redevelopment or premises or sites that are suitable for continued business provided that the redevelopment retains existing businesses on site as far as possible, and in particular industry, light industry, and warehouse/logistic uses that support the functioning of the CAZ or local economy”**. It also states that having a range of sites and premises across the borough to suit the different needs of businesses for space, location and accessibility is vital to maintaining and developing Camden’s successful economy.
- 9.150 Policy 12 of the Fortune Green and West Hampstead NP states that **“development in Fortune Green and West Hampstead shall promote economic growth and**

employment. Developments that provide sites and premises for business, commercial and employment use will be supported. Development of commercial and mixed use premises and sites shall promote economic growth and employment, where viable and appropriate, by...ensuring that where the redevelopment of existing employment sites takes place, the level of employment floorspace is maintained or increased, the provision of additional and/or new business space...the provision of flexible business and commercial space suited to a range of uses, the provision of a range of different sized units, particularly smaller spaces for micro-businesses and studio space, and the provision of affordable or subsidised business space, where appropriate”.

9.151 Policy 13 of the Fortune Green and West Hampstead NP seeks to preserve or enhance the Town Centre through provision of a range of shops and businesses. Commercial premises should be increased, and support for small businesses including affordable space should be provided. Paragraph B8 states that **“additional business, commercial and retail uses are also required – to meet the parallel target for new jobs”**.

9.152 LBC’s Employment Sites and Business Premises CPG states when considering new light industrial spaces, they should have the following features: good access or servicing and delivery, clear, high floor to ceiling heights (at least 3 to 5 metres), lots of natural light, level access – normally ground floor; and ability to function at all times to meet its operational needs. It goes on to state that **“where mixed use development is planned, the Council expects schemes to include a range of types and sizes of employment space wherever possible and appropriate. The mix of employment space in new developments could include:**

a. General offices

b. Flexible or managed co-working space...

Light industrial workshops and artist studio, maker spaces and co-making spaces, sometimes with shared access to equipment and resources”.

9.153 The CPG states that **“where a development incorporates b) or c) above, the Council will usually seek to secure this floorspace, its characteristics, marketing arrangements and an element of affordability through a section 106 agreement”**.

Assessment

9.154 The Outline Proposals seek permission for a maximum of up to 800sq m GIA of - (Class E.g) floorspace. There is no existing office/maker spaces floorspace on the Site and accordingly all of the office (Class E.g) floorspace proposed as part of this Application is an uplift.

9.155 The floorspace proposed in the Outline Proposals is to be located within the Town Square character area and therefore intended to provide for wider local need and to complement the other uses proposed within the Town Centre.

9.156 The London Plan identifies that the Finchley Road / Swiss Cottage District Centre has low potential for commercial growth and, accordingly, a relatively small but sustainable quantum of Class E,g use is therefore proposed in the context of the scale of the wider scheme.

9.157 The provision of some Class E,g floorspace is considered appropriate to provide a variety of employment generating uses within the Site and seeks to complement the range of other Town Centre uses proposed as part of the redevelopment of the Site.

9.158 The proposed Class E,g use is envisaged to be either office use or maker spaces and intended to provide for local need and to add to the mix of uses proposed. The level of floorspace has been restricted to ensure that it is not of a sufficient scale to detract from more appropriate locations for office provision such as the growth areas, Central London and other town centres.

9.159 The floorspace would be high-quality and flexible and it would be possible to sub-divide or amalgamate the space to meet the requirements of local occupiers and SMEs.

- 9.160 250sqm of the Class E,g floorspace is intended to be provided as affordable workspace. The Applicant would work with the Council's Inclusive Economy Team to agree appropriate terms of affordability.
- 9.161 The creative workspace / maker space proposed is intended to fall within Class E.g so would be uses which can be carried out in a residential area without detriment to its amenity e.g. jewellery makers, artist studios etc. The creative / maker space proposed seeks to contribute towards the mix of complementary uses proposed within the Town Centre.
- 9.162 An Employment and Training Strategy prepared by the Applicant is also submitted in support of this Application, setting out the inclusive employment and training opportunities and initiatives to be undertaken within the construction and operational phases of the Proposed Development and will be subject to further approval of details and Liaison with LBC.
- 9.163 The Proposed Development would provide an appropriate quantum of high-quality office/ creative workspace / maker space in a highly accessible location which would complement the other proposed uses and seek to diversify the mix of Town Centre uses proposed at the Site, in accordance with planning policy.

c) Cinema

- 9.164 Policy HC6 of the London Plan states that **“boroughs should develop a vision for the night-time economy, supporting its growth and diversification”**. It goes on to state that **“in Development Plans, town centre strategies and planning decisions, boroughs should...protect and support evening and night-time cultural venues such as pubs, night clubs, theatres, cinemas, music and other arts venues”**.

Assessment

- 9.165 The proposals would provide a minimum of 1,250 sq m of GIA of cinema (Sui Generis) and a maximum of 14,250 sq m GIA of commercial/non-residential use within the Town Centre Plots²⁸, fronting the Town Square character area.
- 9.166 The existing O2 Centre contains a cinema of 4,340 sq m (GIA) currently operated by Vue. Cinemas are an appropriate town centre use²⁹. As set out in Policy Local Plan Policy C3 the council would seek opportunities for new cultural and leisure facilities in major, mixed use development. The Proposed Development would provide a cinema that meets current day standards and would add to the vitality of the Town Centre.

d) Indoor Sport and Recreation

- 9.167 Policy S5 of the London Plan states that to ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should prepare Development Plans that are informed by needs assessments and secure sites for a range of sports and recreation facilities. It goes on to state that development proposals for sports and recreation facilities should increase or enhance the provision of facilities in accessible locations, well-connected by public transport and link to networks for walking and cycling and should maximise the multiple use of facilities.
- 9.168 Policy C3 of Camden’s Local Plan states that **“the Council will seek opportunities for new cultural and leisure facilities in major, mixed-use development and support the temporary use of vacant buildings for cultural and leisure activities”**. It goes on to state that the Council **“will expect the siting of new facilities, including the expansion of existing provision, to take into account its associated impacts. Large scale facilities should be located where as many people as possible can enjoy their benefits and make use of public transport to get there. Central London and town centres will, therefore, be the most appropriate locations. Smaller facilities**

²⁸ Outline Town Centre Development Plots S1,N1,N2,N3.

²⁹ As set out in Camden Local Plan (2017) Policy C3.

may, however, be appropriate anywhere in the Borough providing they do not have an adverse impact on the surrounding area or the local community”.

Assessment

- 9.169 The proposals would provide a maximum of 1,200 sq m GIA of indoor sport and recreation (Class E.d) use. The Site currently provides a private gym. Indoor sports and recreation activities may also be provided within the Proposed Development.
- 9.170 This use is commensurate with the Town Centre location of the Site and would add to the mix of uses in accordance with London Plan Policy S5 and Camden Local Plan Policy C3.

e) Cafes, Restaurants, and Pub/Drinking Establishments

- 9.171 The London Plan Policy E9 states that a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supporting in line with the wider objectives of this Plan, particularly for town centres.
- 9.172 Policy HC6 of the London Plan states that **“boroughs should develop a vision for the night-time economy, supporting its growth and diversification”**. It goes on to state that **“in Development Plans, town centre strategies and planning decisions, boroughs should...promote the night time economy, where appropriate in...town centres, where public transport such as the Night Tube and Night Buses are available, diversify the range of night-time activities, including extending the opening hours of existing daytime facilities such as shops, cafes, libraries, galleries and museums, address the cumulative impact of high concentrations of licenced premises on anti-social behaviour, noise pollution health and wellbeing and other issues for residents and nearby uses, and seek ways to diversify and manage these areas, ensure night-time economy venues are well served with face and convenient night time transport, protect and supporting evening and night-time cultural venues such as public, night clubs, theatres, cinemas, music and other arts venues”**.

- 9.173 At a local level, Camden Local Plan Policy E1 (i) recognises the importance of other employment generating uses, including retail uses.
- 9.174 Policy 13 of the Fortune Green and West Hampstead NP states that in order to preserve or enhance the character of the Town Centre, proposals should increase the range of retail outlets, food/drink outlets and commercial premises.
- 9.175 Camden’s Town Centres and Retail CPG states that **“food, drink and entertainment uses such as cafes, restaurants, bars and pubs are an important part of the mix and offer of Camden’s centres and contribute to their vibrancy and vitality”**.
- 9.176 The CPG goes on to state that **“in order to protect shopping facilities, maintain the character of Finchley Road / Swiss Cottage and avoid cumulative impacts on the amenity of residents, we will allow a maximum of 20% of the total premises within the primary frontage to be in a food, drink or entertainment use...to prevent harmful impacts on the large residential population within this centre, new or expanded food, drink and entertainment uses should be small in scale. Small in scale is generally considered to be 100sq m. Larger premises may be considered acceptable for restaurants, which generally have less impact than other food, drink and entertainment uses. The Council will consider the nature of the proposed use and its location, taking into account the level and proximity of housing, when assessing the acceptability of a proposal in terms of its size”**.

Assessment

- 9.177 The Detailed Proposals seek permission for 114 sq m (GIA) of food and drink (Class E.b) uses. The Outline Proposals seek permission for up to 1,000 sq m (GIA) of food and drink (Class E,b) uses.
- 9.178 The Outline Proposals also seek permission for up to 900 sq m (GIA) of drinking establishment (Sui Generis) use in Phases 2 and 3.
- 9.179 Policy supports the provision of food and drink and drinking establishment in Town Centres. It is complimentary use to retail as it provides shoppers with a rest bite a place

to meet. The land use balance in respect of food and drink and drinking establishment is appropriate and reasonable. The Proposed Development meets London Plan Policy E9 and HC6, Camden Local Plan Policy E1(i), Policy 13 of the Fortune Green and West Hampstead NP and Camden's Town Centre and Retail CPG.

Social Infrastructure – Community Facilities, Creche and Health Centre

9.180 Policy S1 of the London Plan states that **“boroughs should ensure the social infrastructure needs of London’s diverse communities are met”**. It goes on to state that **“development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. Development proposals that seek to make the best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities”**. Any new facilities should be easily accessible by public transport, cycling and walking and should be encouraged in town centres and high streets.

9.181 Policy S2 of the London Plan states that **“development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported”**. It also states that new facilities should be easily accessible by public transport, cycling and walking.

9.182 Policy S3 of the London Plan states that **“development proposals for education and childcare facilities should:**

- 1) Locate facilities in areas of identified need**
- 2) Locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling**
- 3) Locate entrances and playgrounds away from busy roads, with traffic calming at entrances**
- 4) Link to existing footpath and cycle networks to create health routes to schools, and other education and childcare facilities, to enable all children to travel actively to school (walk, cycle or travel by public transport)**

- 5) **Maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures**
- 6) **Encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities, and between early years and health and social care providers**
- 7) **Ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach**
- 8) **Ensure that facilities incorporate suitable, accessible outdoor space**
- 9) **Locate facilities next to parks or green spaces, where possible”.**

9.183 Camden Local Plan Policy C1 states that the Council will **“support the provision of new or improved health facilities, in line with Camden’s Clinical Commissioning Group and NHS England requirements”.**

9.184 Camden Local Plan Policy C2 states that **“the Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of our community and reflect new approaches to the delivery of services”.**

9.185 Policy C2 goes on to state that the **“Council will:**

- a. **Seek planning obligations to secure new and improved community facilities and services to mitigate the impact of developments...;**
- b. **Expect a developer proposing additional floorspace in community use, or a new community facility, to reach agreement with the Council on its continuing maintenance and other future funding requirements;**
- c. **Ensure that facilities provide access to a service on foot and by sustainable modes of travel;**
- d. **Facilitate multi-purpose community facilities and secure sharing or extended use of facilities that can be accessed by the wider community, except for facilities occupied by the emergency services due to their distinct operating needs;**
- e. **support the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into**

account the social and economic benefits they generate for Camden, London and the UK. In assessing proposals, the Council will also balance the impact proposals may have on residential amenity and transport infrastructure;

- f. **seek the inclusion of measures which address the needs of community groups and foster community integration”.**

9.186 Policy 10 of the Fortune Green and West Hampstead NP states that **“development that increases the demand for community facilities and services shall make provision where appropriate – or contribute towards- appropriate community facilities to meet the needs of a diverse and growing population. This shall be achieved by the provision of relevant facilities such as:**

- i. **New school places, particularly for primary pupils**
- ii. **Additional nursery places in the area**
- iii. **Primary care health facilities, particularly in or near the West Hampstead Growth Area**
- iv. **Improvements to existing community centres and the range of services they provide**
- v. **New community facilities, where appropriate and where there is an identified need”.**

9.187 Camden’s Community Uses, Leisure Facilities and Pubs CPG states that for healthcare facilities, regard should be had to the Joint Strategic Needs Assessment, which describes the current and future health and wellbeing needs of the local population and identifies priorities for action.

Assessment

9.188 As demonstrated within the SCI the Applicant undertook extensive public consultation. In respect of community facilities people most wanted to see a health centre included within the proposals with other popular options including a community centre.

- 9.189 The Outline Proposals seek permission for a minimum of 1,000 sq m GIA and a maximum of 1,200 sq m GIA of health centre (Class E,e) use within Plot N7.
- 9.190 The Detailed Proposals seek permission for 270sq. m GIA of community facilities (Class F2) in Plot N4 which includes a community centre. It was considered that having a community centre in the first phase would help provide a community hub from day one with the local community, including the new residents in the first phase to benefit from this space. The community can help shape and evolve what is provided within the space to ensure it is a true community asset.
- 9.191 The Outline Proposals would also provide a maximum of 300 sq. m GIA floorspace for use as a creche (Class E,f) across Development Plots N6, N7 and S8.
- 9.192 The package of community facilities including a high-quality and fit for purpose health centre, community facility and creche meet the planning policy objectives at all levels and provide a complimentary use to the Town Centre.

10 Residential Design

10.1 This section assesses the proposed residential units in design terms and considers the following:

- a. Unit mix
- b. Housing quality / design standards
 - i. Unit sizes and configuration
 - ii. Amenity space
 - iii. Playspace
 - iv. Aspect and privacy
 - v. Daylight, sunlight and overshadowing

10.2 This section does not consider the external building design of the residential spaces, these details are assessed within the following section of this statement and further details are included within the submitted Design and Access Statement.

a. Unit Mix

10.3 Policy H10 of the London Plan states that **“schemes should generally consist of a range of units sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision makers should have regard to:**

- 1) **Robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment**
- 2) **The requirement to deliver mixed and inclusive neighbourhoods**
- 3) **The need to deliver a range of unit types at different price points across London**
- 4) **The mix of uses in the scheme**
- 5) **The range of tenures in the scheme**
- 6) **The nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity**
- 7) **The aim to optimise housing potential on sites**

- 8) **The ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock**
- 9) **The need for additional family housing and the role of one and two bed units in freeing up existing family housing**

10.4 Camden’s Local Plan Policy H6 states that **“the Council will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes and by seeking a variety of housing suitable for Camden’s existing and future households, having regard to household type, size, income and any particular housing needs”**.

10.5 Policy H6 also states that the Council **“will seek to secure a variety of housing suitable for existing and future households overall across the development in the borough”**. It goes on to state that **“where housing is proposed as part of development with a site area of 0.5ha or greater, we will expect development to make provision for particular housing needs”**. As part of this, the Council may seek the inclusion of housing for older people or vulnerable people, student housing, or other housing with shared facilities. In considering the scale and nature of provision for particular housing needs, the Council will take into account the character of the development, the site and the area, site size and any constraints on development the site for a mix of housing, the impact on creation of mixed, inclusive and sustainable communities, the impact of provision for particular housing needs on the efficiency and overall quantum of development, the economics and financial viability of the development including any particular costs associated with it, and whether an alternative approach could better meet the objectives of this policy and the Local Plan.

10.6 Policy H7 of Camden’s Local Plan states that **“the Council will aim to secure a range of homes of different sizes that will continue to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply”**. Housing developments will be expected to contribute to meeting the priorities set out in the Dwelling Size Priorities Table and include a mix of large and small homes.

10.7 Policy H7 goes on to state that the Council will take a flexible approach to assessing the mix of dwelling sizes proposed in each development, but having regard to the different dwelling size priorities for different tenures, evidence of local needs from borough wide

priorities, the character of the development, the site and the area, including the impact of the mix on child density, site size and any constraints on developing the site for a mix of homes of different sizes, the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing and the extent to which flexibility around the mix of market homes could secure the delivery of additional affordable housing.

10.8 Camden’s Dwelling Size Priorities Table is as follows:

	1-bedroom (or studio)	2-bedroom	3-bedroom	4-bedroom (or more)
Social- affordable rented	lower	high	high	Medium
Intermediate affordable	high	Medium	lower	lower
Market	lower	high	high	lower

Table 10.1: Camden’s Dwelling Size Priorities Table

10.9 Policy 1 of the NP states that “**residential development shall provide a range of housing types, to meet a range of needs, as appropriate, related to the scale of development**”.

Assessment

10.10 The Proposed Development seeks to provide a range of unit sizes. Around 1,800 residential units are proposed across the Site, with 608 residential units forming part of the Detailed Proposals and around 1,188 residential units forming part of the Outline Proposals.

10.11 The Application would include a minimum of 35% affordable housing by floorspace (GIA) across the Development. The affordable housing would include Low-Cost Rent and Intermediate Rented Housing at a ratio of 60:40 by floorspace.

10.12 With regards to the Detailed Proposals, the unit mix of the 608 residential units is as follows:

Type of Housing	Private	Low-Cost Rent	Intermediate Rent	Total
Studio	59 (14%)	0	0	59
1 bedroom	157 (37%)	14 (13%)	48 (57%)	219
2 bedroom	187 (45%)	36 (35%)	25 (30%)	248
3 bedroom	17 (4%)	54 (52%)	11 (13%)	82
Total	420	104	84	608

Table 10.2: Detailed Proposals Housing Mix

10.13 With regards to the Outline Proposals, around 1,188 residential units are proposed. The proposed unit mix percentages are shown in the table below:

Type of Housing	Private	Low-Cost Rent	Intermediate Rent
Studio	0-20%	0-5%	0-20%
1-bedroom	0-40%	0-25%	0-30%
2-bedroom	30-50%	20-25%	20-40%
3-bedroom	0-5%	45-50%	0-15%

Table 10.3: Distribution of Housing Size Mix across the Outline Proposals on a % basis

10.14 As set out in paragraph 2.8 an illustrative masterplan has been developed to show how the Proposed Development could come forward. Table 7 below sets out an illustrative housing mix for the Outline Proposals.

Type of Housing	Private	Low-Cost Rent	Intermediate Rent
	Percentage	Percentage	Percentage
Studio	143 (18%)	4 (2%)	8 (5%)
1 bedroom	250 (31%)	51 (24%)	52 (31%)
2 bedroom	380 (47%)	59 (28%)	79 (47%)
3 bedroom	37 (4%)	97 (46%)	28 (17%)
Total	810	211	167

Table 10.4: Illustrative Housing mix for Outline Proposals

- 10.15 Having regard to Camden’s Dwelling Mix Priorities Table, the Detailed Proposals have sought to ensure an appropriate mix of dwellings across the Site and within the relevant tenures, in line with market requirements.
- 10.16 With regards to the Low-Cost housing provided in the Detailed Proposals, the Applicant has sort to align with the LBC policy housing mix. The highest provision (52%) would be for 3-bedroom units which are considered ‘high’ priority in the dwelling mix table. A slightly lower proportion (35%) of 2-bedroom units are proposed which are also considered ‘high’ priority by LBC. The lowest proportion (13%) would be for 1-bedroom units which are considered ‘lower’ priority by LBC. Notwithstanding the illustrative masterplan detailed above, the intention is to ensure that a minimum of 50% of the Low-Cost housing (across both the Detailed and Outline Proposals) would be family, 3-bedroom units, which are ‘high’ priority within LBC’s dwelling mix table.
- 10.17 In respect of the Intermediate housing provided in the Detailed Proposals, the highest provision (57%) would be for 1-bedroom units which are considered ‘high’ priority by Camden. A slightly lower proportion (30%) of 2-bedroom units are proposed which are considered ‘medium’ priority by Camden. The lowest proportion (13%) would be for 3-bedroom units which are considered ‘lower’ priority by Camden.
- 10.18 In relation to the private housing provided in the Detailed Proposals, 45% would be provided as 2-bedroom units which are considered to be ‘high’ priority by Camden. The highest provision would be for studio/1-bedroom units which equate to 51% of the overall provision. The lowest proportion (4%) would be provided as 3-bedroom units which are ‘high’ priority to Camden. The slightly higher proportion of studio/1-bedroom and 2-bedroom units is considered more appropriate in this urban location, given the proximity of the Site to the underground and overground rail network.
- 10.19 Percentages have been provided for the unit mix for the outline part of the scheme. This provides flexibility to ensure that the most appropriate unit mix is delivered to reflect market requirements at the time of the relevant reserved matters applications.
- 10.20 Accordingly, it is considered that the unit mix of the Detailed Proposals aligns with the aspirations of Camden’s Dwelling Mix Priority Table whilst accounting for Site specific circumstances. The Outline unit mix is provided as percentage ranges which allow the unit mix to be adapted to reflect market requirements at the time of the relevant reserved

matters applications. The proposed mix would provide a mix of unit sizes which would help to create a vibrant new community and would provide a significant amount of family sized housing appropriate to the Site's location. Therefore, the unit mix proposed is considered to align with planning policy.

b. Housing Quality / Design Standards

- 10.21 London Plan Policy D6 provides very detailed guidance on housing quality and standards, requiring that **“housing development should be of a high-quality design and provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures”**. Table 3.2 specifies the key qualitative aspects which should be addressed in the design of housing developments.
- 10.22 Camden's Local Plan Policy H6 states that **“the Council will aim to minimise social polarisation and create mixed, inclusive and sustainable communities by seeking high quality accessible homes and by seeking a variety of housing suitable for Camden's existing and future households, having regard to household type, size, income and any particular housing needs”**.
- 10.23 Policy H6 goes on to state that in order to achieve this, the Council will encourage design of housing to provide functional, adaptable, and accessible spaces, expect all self-contained homes to meet the nationally described space standard, require 90% of new build self-contained homes to be **accessible** in accordance with Building Regulations M4(2) and 10% to be suitable for occupation by a wheelchair user or easily adapted in accordance with Building Regulations M4(3).
- 10.24 Paragraph 7.32 of Camden's Local Plan states that **“all residential developments are required to be designed and built to create high quality homes. The Council will seek to ensure that residential development, both new build and change of use:**
- **is self-contained and has its own secure private entrance;**
 - **has good ceiling heights and room sizes;**
 - **is dual aspect except in exceptional circumstances;**
 - **has good natural light and ventilation;**
 - **has good insulation from noise and vibration;**

- has a permanent partition between eating and sleeping areas (studio flats are acceptable where they provide adequate space to separate activities);
- incorporates adequate storage space;
- incorporates outdoor amenity space including balconies or terraces; and
- is accessible and adaptable for a range of occupiers”.

i. Unit sizes and configuration

10.25 Policy D6 of the London Plan requires all housing developments to have adequately sized rooms in line with the minimum internal space standards for new dwellings set out at Table 3.1 of the London Plan.

10.26 Paragraph 7.33 of Camden’s Local Plan states that **“new dwellings and conversions to residential use will be expected to meet the government’s nationally described space standard as set out in the London Plan. The Council will also require development to adhere to the Mayor’s Housing Supplementary Planning Guidance”**.

Assessment

10.27 All residential units that form part of the Proposed Development would meet the minimum space standards contained within the London Plan, these being the most recent minimum space standards for residential development within London and to ensure high quality living environments for future residents. Where appropriate, and as encouraged by the Mayor, residential units would exceed these minimum standards.

ii. Amenity space including Open Space and Playspace

10.28 The London Plan requires the provision of amenity space as part of residential development. Policy D6 outlines that where there are no higher local standards in the borough, a minimum of 5 sq m of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq m should be provided for each additional occupant, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum GIA.

- 10.29 Policy D1 of Camden’s Local Plan states that the Council will seek to secure high quality design in development and will require that development incorporates outdoor amenity space. Paragraph 7.32 states that new residential development should incorporate outdoor amenity space including balconies or terraces.
- 10.30 Policy A2 of Camden’s Local Plan states that in order to secure new and enhanced open space and ensure that development does not put unacceptable pressure on the Borough’s network of open spaces, the Council will **“apply a standard of 9 sq m per occupant for residential schemes and 0.74 sq m for commercial developments”**.
- 10.31 London Plan Policy S4 sets out that development proposals for schemes that are likely to be used by children and young people should increase opportunities for play and informal recreation and enable children and young people to be independently mobile. Additionally, Policy S4 states that for residential developments proposals should incorporate good-quality and accessible play provision for all ages. The GLA sets out that:
- 10.32 **“at least 10 square metres of playspace should be provided per child that:**
- a) Provides a stimulating environment**
 - b) Can be accessed safely from the street by children and young people independently**
 - c) Forms an integral part of the surrounding neighbourhood**
 - d) Incorporates trees and/or other forms of greenery**
 - e) Is overlooked to enable passive surveillance;**
 - f) Is not segregated by tenure”**
- 10.33 The Camden Local Plan seeks to secure new and enhanced open space and ensure that development does not put unacceptable pressure on the Borough’s network of open spaces. Policy A2 sets out that the Council will give priority to play facilities and the provision of amenity space which meet residents’ needs where a development creates a need for different types of open space.
- 10.34 The CPG mirrors the open space requirements set out in Policy A2 and the London Plan standards on play space (10sqm per child). The CPG does, however, make an exception by recognising that the 9sqm of open space requirement per resident would, reasonably,

already include an allowance for play provision and consequently the Council will seek an additional 6.5sqm per child (instead of the Mayor's 10sqm per child).

Assessment

10.35 The Proposed Development has been designed around the provision of open and inclusive spaces, creating as much publicly accessible open and green space wherever possible at ground level, over 50% of the Site will be public realm. There will be some semi-private amenity spaces for residents within podium gardens.

10.36 Each residential unit would have access to its own private amenity space in the form of a balcony. In addition, the Proposed Development provides a wide range of other amenity spaces, as follows:

- Town Square (public)
- Central Square (public)
- Linear Park (public)
- Podiums (shared private)
- Roof terraces (shared private)
- Community Green (public)

10.37 The Detailed Proposals would provide 4,943sqm³⁰ of open space. This excludes roads, shared surfaces, streets and paths and play space for all ages.

10.38 2,100sqm of play space is provided in the Detailed Proposals, providing play for all age groups.

0-4 Yrs (sq. m)	5-11Yrs (sq. m)	11-15Yrs (sq. m)	16+Yrs (sq. m)	All Years (sq. m)
900	700	330	170	2,100

Table 10.5 Playspace provision in Detailed Proposals

- 10.39 Within the Detailed Proposals, a series of different playspaces for all ages (0-4 years, 5-11 years and 11+ years) are proposed across the public realm and within the open spaces. The majority of playspace is proposed within the Linear Park, the Podium gardens and within the Community Green. Some “play on the way” space is also proposed between Plots N4 and N5. The specific location of the playspaces can be identified on East’s Phase 1 playspace drawing submitted with the Application.
- 10.40 Based on the illustrative mix for the Outline Proposals, the policy compliant level of open space for the Proposed Development (Detailed and Outline Proposals) would be circa 33,261sqm with a requirement of 6,010sqm of playspace.
- 10.41 The Proposed Development based on the illustrative mix provides 6,010sqm of playspace and 13,3089sqm of open space. This open space figure excludes roads, shared surfaces, streets and paths and play space for all ages.
- 10.42 The Design and Access Statement sets out how the Proposed Development could meet the 10sqm per child of playspace standard including the over 16’s which is rarely achieved. Whilst over 50% of the Site would come forward as public realm (both open spaces and urban realm), and the Proposed Development provides a significant quantum of open space across the Site, the Proposed Development is unable to meet the full policy requirement in respect to open space. It is envisaged in policy that there are instances where proposals will be unable to meet the open space requirement whilst achieving the requisite playspace as there is an allowance for a payment to be made where it is required.
- 10.43 It is noted that there is a policy conflict between playspace and open space where the policy on open space is to be applied to masterplans. The Proposed Development does not concentrate playspace in one area (which would be the case on most smaller developments). The Proposed Development is a landscape led masterplan where play is integrated within the public realm and open space. The spaces within the public realm are therefore dual purpose. This approach is fully supported by LP Policy S4 which states that playspace should “form an integral part of the surrounding neighbourhood”. In addition, the Open Space figure provided does not take into consideration the private open space afforded to residents of the new development within the podiums.

- 10.44 Whilst the Proposed Development falls short of the policy required level of open space, it still provides a significant quantum of open space and the policy requirement for play space is met.
- 10.45 The playspace proposed is a reasonable and proportionate quantum, aligning with Mayoral and LBC policy requirements. In addition, it is noted that due to the masterplan and strategic nature of the Proposed Development, the landscape strategy is based on providing play that is holistically integrated within the landscape and the biodiversity measures as opposed to designated areas with conventional play equipment. The Proposed Development would therefore provide a good balance between open space and playspace which is in accordance with the policy objectives in LBC Local Plan Policy A2, Part M and the supporting policies in the LBC CPG, whilst also achieving London Plan policy objectives for playspace.
- 10.46 With regards to the Outline Proposals, 10sqm of playspace per child, suitable for different age ranges, would be provided. The exact quantum of playspace required for each plot would be calculated at the Reserved Matters Stage when the residential mix is known. In achieving the playspace requirements, a non-standard Multi-Use Games Area (MUGA) is proposed within the Outline Proposals, on the southern edge of the Site, to allow for organised games within a purpose-built space for older children. The detailed design of the MUGA would come forward at the reserved matters stage.

iii. Aspect and privacy

- 10.47 Policy D3 of the London Plan requires development proposals to deliver appropriate outlook, privacy and amenity.
- 10.48 Camden Local Plan Policy A1 seeks to protect the quality of life of occupiers and neighbours, outlining that the GLA will grant permission for development unless it causes unacceptable harm to amenity. Policy A1 highlights that visual privacy and outlook will be considered when seeking to ensure that the amenity of communities, occupiers and neighbours is protected.

10.49 The Amenity CPG states that developments should be designed to protect the privacy of occupiers of both existing and proposed dwellings. Mitigation measures should be put in place to reduce the ability to overlook.

Assessment

10.50 The Proposed Development has been designed to take advantage of the southerly aspect of the Site, ensuring that all new residents have appropriate and suitable living conditions, along with suitable levels of privacy. The lower-level units have views out over the proposed green and open spaces and the upper floors have significant panoramic vistas.

10.51 In respect of the Detailed Proposals, the overall plan form offers many opportunities for dual aspect apartments which can be seen on the internal layouts shown on the submitted plans. The design has sought to ensure that the majority of larger apartments are dual aspect to ensure sufficient light and views in different directions. This adds flexibility and variety to the internal spaces as well as improving opportunities for natural ventilation.

10.52 The majority of dual aspect apartments are located on corners although some span the building width, taking advantage of the break between access corridors. All tenures include dual aspect apartments with these making up 90% of the social rented units, 38% of the intermediate rent units and 50% of the private units within the Detailed Proposals. When stating the quantum of dual aspect units, only the corner units have been considered as qualifying in providing dual aspect accommodation. However, the bay protrusions that form part of Plot N3-E would also provide dual aspect views.

10.53 Whilst the internal layouts of the Outline Proposals have not yet been designed in detail, these residential units would be designed to the same standards as the Detailed Proposals, ensuring suitable aspect and privacy for all proposed residential units.

10.54 Consideration has also been given to distances between buildings to minimise overlooking and loss of privacy, as well as seeking to maximise light and ventilation. Typically, primary frontages are set to a minimum of 18m between buildings. In some instances, the separation distance between buildings is reduced and, in these areas, the internal arrangement reduces the possibility for overlooking, whilst the positioning of buildings seeks to ensure that there are few sightlines between apartments.

10.55 The Proposed Development and apartment layouts have been designed to maximise views, provide as many dual aspect units as possible, and protect privacy between buildings. Design codes, as well as the parameter plans, would secure these elements of the development for the Outline Proposals.

iv. Daylight, sunlight and overshadowing

10.56 Paragraph 130 of the NPPF states that planning decisions should ensure that developments create places that have a high standard of amenity for existing and future users.

10.57 London Plan Policy D3 sets out that development proposals should deliver appropriate outlook, privacy and amenity.

10.58 Policy A1 emphasises that the Council will seek to ensure that the amenity of communities, occupiers and neighbours is protected. In particular, the Council will consider sunlight, daylight and overshadowing.

10.59 The Amenity CPG expects applicants to consider the impact of development schemes on daylight and sunlight levels and that the 45 degree and 25 degree tests cited in the BRE guidance should be used to assess whether a sunlight and daylight report is required.

Assessment

10.60 As a long narrow Site stretching east to west, the Site enjoys a long southern aspect. Placement and massing of the buildings seeks to take advantage of this favourable orientation to maximise light penetration into apartments whilst ensuring a mixture of sun and shade in the outdoor spaces.

10.61 A Daylight and Sunlight Report considering the potential levels of daylight, sunlight and overshadowing that will be enjoyed within the Detailed Proposals has been prepared by Point 2 and is appended to the ES. The conclusions are summarised here.

10.62 The results of the cumulative Average Daylight Factor (ADF) assessments (worst-case scenario) show that a good level of compliance with the BRE guidelines is expected.

Approximately 85% of all habitable rooms assessed will enjoy good levels of daylight for an urban area.

- 10.63 In addition, the No-Sky Line (NSL) results show that approximately 74% of all rooms should enjoy a good level of daylight distribution for an urban area. Overall, the results are considered to show a good level of compliance with the recommended standards.
- 10.64 The Annual Probable Sunlight Hours (APSH) results show that acceptable levels of sunlight will be enjoyed given the general orientation of the blocks, provision of balconies and the urban area.
- 10.65 With regards to overshadowing, the 2 hours sun-on-ground and transient overshadowing assessments show that each resident within the Detailed Proposals will have access to an amenity space which enjoys good levels of sunlight for an urban area. Whilst all of the proposed open spaces within the wider masterplan may not achieve the recommended standards, with appropriate design and use of materials, it is considered that all spaces will be enjoyable spaces to use.
- 10.66 As set out within the BRE guidelines, daylight and sunlight availability are just one of many factors in site layout design and a balance between the various design factors often needs to be made. In high density schemes, such as this, it is considered that the functionality of the apartments is an important factor as well as other constructional and regulatory control issues, including solar heat gain, acoustic and/or privacy and the provision of balconies.
- 10.67 Overall, whilst achieving this balance, the daylight and sunlight assessment results are considered to show a good level of compliance for an urban area when assessed against the BRE guidelines standards and accordingly are considered to comply with relevant planning policy.

11 Design, Bulk and Massing

- 11.1 This section reviews the proposals against relevant national, regional and local planning policy in term of design, specifically:
- a) Masterplan and character areas
 - b) Layout
 - c) Heights and massing
 - d) Building typologies
 - e) Materials
 - f) Inclusivity
- 11.2 The Government has attached great importance to the design of the built environment in the NPPF with a presumption in favour of sustainable development.
- 11.3 Paragraph 126 of the NPPF states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 11.4 Paragraph 130 of the NPPF states that development should function well and add to the overall quality of the area over the lifetime of the development. In pursuance of this development should be visually attractive, sympathetic to the local character and context, maintain a strong sense of place and distinctiveness.
- 11.5 The National Design Guide, and the National Model Design Code and Guidance Notes for Design Codes illustrate how well-designed places that are beautiful, healthy, greener, enduring and successful can be achieved in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate planning practice guidance on design process and tools.
- 11.6 The National Design Guide addresses the question of how we recognise well designed places, by outlining and illustrating the Government's priorities for well-designed places in the form of ten characteristics which are:
- Context – enhances the surroundings;
 - Identity – attractive and distinctive;

- Built form – a coherent pattern of development;
- Movement – accessible and easy to move around;
- Nature – enhanced and optimised;
- Public spaces – safe, social and inclusive;
- Uses – mixed and integrated;
- Homes and buildings;
- functional, healthy and sustainable;
- Resources – efficient and resilient; and
- Lifespan – made to last.

- 11.7 London Plan Policy D2 states that the density of development should be proportionate to the site’s connectivity and access to public transport.
- 11.8 London Plan Policy D3 sets out that all development must make the best use of land by following a design led approach to optimise the capacity of sites. Part B of Policy D3 states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Policy D3 goes on to state that development proposals should have regard to form and layout, experience, and quality and character of the place and surroundings.
- 11.9 London Plan Policy D4 outlines that the design of development proposals should be thoroughly scrutinised. The scrutiny of a proposed development’s design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping.
- 11.10 London Plan Policy D5 states that developments should achieve the highest standards of accessible and inclusive design.
- 11.11 London Plan Policy D7 states that in order to provide suitable housing and genuine choice, residential development must ensure that 10% of dwellings are delivered to Building Regulations M4(3) (wheelchair user dwellings) and all other dwellings are delivered to Building Regulations M4(2) (accessible and adaptable dwellings).
- 11.12 Policy D9 of the London Plan determines that it is the responsibility of individual boroughs to identify appropriate locations for tall buildings. When tall buildings are

proposed, development proposals should address the various criteria that are specified in relation to visual impacts, functional impacts, environmental impacts and cumulative impacts.

11.13 At a local level, Camden Local Plan Policy D1 seeks to secure high quality design in development and to ensure that new developments are attractive, safe and easy to use as well as inclusive and accessible for all.

11.14 Camden Local Plan Policy C6 seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. The Council will expect all buildings and places to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all. The Council will seek to ensure that development meets the principles of lifetime neighbourhoods.

11.15 Camden has also published a Design CPG which highlights the Council's commitment to excellence in design and schemes should consider:

- The context of a development and its surrounding area;
- The design of the building itself;
- The use and function of buildings;
- Using good quality sustainable materials;
- Creating well connected public spaces and good quality public realm;
- Opportunities for promoting health and well-being; and
- Opportunities for improving the character and quality of an area.

11.16 The Access for All CPG sets out the Council's expectation that all development of buildings and places, including changes of use and alterations or refurbishment of existing buildings, to be inclusively designed and useable by all the promote equality of opportunity.

11.17 Policy 2 of the Fortune Green and West Hampstead NP states that all development shall be of a high quality of design, which complements and enhances the distinct local character and identity of Fortune Green and West Hampstead.

Assessment

11.18 It is demonstrated in the Application submission documents that the Proposed Development is of a high-quality design which responds to its context. The Proposed Development complies with the revised Framework for buildings and places to be beautiful and sustainable. The Design quality of the Proposed Development has been considered in the Detailed Proposals and the Outline, with the Design Codes fully according with the amended Framework and the requirement to consider the National Design Guide.

a) Masterplan and character areas

11.19 The submitted DAS prepared by AHMM, outlines the overall design principles for the masterplan and provides an overview of the character areas which make up the Proposed Development.

11.20 The Proposed Development seeks to transform this currently underused Site to ensure that it actively contributes socially, economically and environmentally to its neighbourhood.

11.21 As set out earlier in this Statement, the Application is what is sometimes called a hybrid, with both Detailed and Outline Proposals. Detailed planning permission is sought for Plot N3-E, N4 and N5 (Phase 1) with outline permission sought for the remainder of the Site (Phases 2 and 3). The designs for the Detailed Proposals would set the character for the Outline Proposals, which would then be secured in accordance with the parameter plans and the design codes. An illustrative masterplan is also provided to show one way in which the Proposed Development might come forward. Accordingly, references to masterplan and the Proposed Development are in relation to the illustrative masterplan prepared by AHMM.

11.22 The Proposed Development would provide around 1,800 new homes, of which 35% (by floorspace) would be affordable. The scheme would be totally car free with public spaces covering half its area. The Site has been divided into three distinct zones, each with its own character. A network of pedestrian routes would improve permeability and give easy access to public transport. A number of commercial and community uses are proposed across the Site, replacing some of those lost through the redevelopment of the O2 Centre.

11.23 The three neighbourhoods created by the Proposed Development are the Community Green (on the western part); the Town Square (off Finchley Road), and the Residential Neighbourhood in the central part of the Site (between the Community Green and Town Square). Each character area takes advantage of position on the Site and its immediate contextual character. Further detail is provided on the character areas below:

1. **The Community Green (western end of the Site)**

The Community Green centres on a large open green space focused on the concept of health and wellbeing. The open spaces and sports facilities are complemented by a varied mix of uses such as a health centre and crèche. A bus stop connects this space to the wider area at the heart of the masterplan and serves as a fulcrum to the wider area close to the north south connection of Billy Fury Way and Granny Dripping Steps. The final western connection of Blackburn Road from West End Lane provides a gentle transition from the local context to the arrival in the new neighbourhood.

2. **The Residential Neighbourhood (in the centre of the Site)**

The Residential Neighbourhood is a quieter space with a mix of family homes and residential amenity spaces served by a few smaller commercial uses and a community centre. This will create a thriving local community helping to establish a safe environment for all that live there, visit and pass through it.

3. **The New Town Square (the eastern end of the Site)** The Town Square provides a new civic and commercial heart to the scheme. Surrounded by a range of uses at ground floor including recognisable high street brands and local independent businesses, the Town Square will create a thriving part of the local economy and a destination in its own right. A number of the existing uses loved by the local community such as a supermarket, cinema and gym will be accommodated here juxtaposed against a wider range of different scaled retail and business opportunities to better serve the variety in scale of modern retail trends.

b) Layouts

- 11.24 The approach to and provision of enhanced public realm is fundamental to the Masterplan development concept. Over half of the Site is proposed to be provided as public realm, and streetscapes are significantly improved. The different areas of public realm give variation in terms of character, materials (hard versus soft) and scale. The landscape proposals seek to bind the buildings and provide a setting for the different uses proposed across the Site.
- 11.25 In determining the optimum layout of the Site, consideration has been given to providing improved pedestrian connections, whilst maintaining appropriate vehicular access, provision of public spaces, maximising solar sun-path and plot spacing (street hierarchy). These are covered in more detail below.
- 11.26 It is vital that the development facilitates improve pedestrian connections through the Site from and into its surroundings. A Linear Park is proposed to connect the Site from east-west, into the existing communities. It would run along the Site's southern edge and would link a series of new public spaces that thread through the Site. North-south landscaped spaces spur off the Linear Park and connect to Blackburn Road. These allow a relaxed permeability of movement throughout the development and add to the variation in scale and character of the external public spaces.
- 11.27 Public spaces are provided through the Site. The intention is that these would enhance their immediate context and would vary greatly, from small scale, intimate and richly planted and landscaped gardens, to busy precincts outside shops and leisure facilities. The spaces would be linked by an enticing, safe and easily walkable network of paths.
- 11.28 The majority of the areas in the Site will not allow Vehicle access. However, where allowed into the Site vehicles are carefully filtered. Shops would require frequent deliveries which would be handled in loading bays using the existing basement, accessed from Finchley Road. Blackburn Road, which runs along much of the Site's northern edge would be retained to provide vehicular access to the shops and amenities in the centre of the Site, including refuse trucks, delivery vans, taxis, emergency vehicles and cars for blue badge residents. Where vehicles also utilise the

streetscape, which is the case for Blackburn Road, priority is given to the landscape design.

11.29 As a long narrow Site stretching east to west, the Site enjoys a long southern aspect. Accordingly, placement and massing of the buildings seeks to take advantage of this favourable orientation to maximise light penetration into apartments and ensures a mixture of sun and shade in the outdoor spaces.

11.30 The wide rail tracks to the south of the Site reinforce its favourable aspect. Placing most of the buildings along the northern edge expands the sense of openness to the south and the sunlight it provides with vehicle access along Blackburn Road to the north.

c) Heights and Massing

11.31 The proposed heights resulted from extensive design workshops with LBC and Design Panel Reviews (as set out in the consultation chapter of this Statement). The approach to massing has been iterative with carefully consideration given to the Site and surrounding context

11.32 In relation to Finchley Road, the Proposed Development knits into the existing Victorian terrace with a new terrace that sweeps into the new Town Square. Another terrace completes the Finchley Road frontage.

11.33 With respect to West End Lane, the Proposed Development builds up from the West End Lane urban grain, gradually stepping up in height to the main body of the site. This also acknowledges the more recent introduction of height in the Nido development.

11.34 In the centre of the Site the Proposed Development places greater height to the north and steps down to the south. However, within the northern massing variation is also introduced to provide points of height relieved by lower links within courtyard buildings. The buildings which sit individually on to the new squares (N3E and N6) are lower than the highest points of massing so as not to dominate the public space.

These along with the mid-rise buildings to the south create a family of similar height buildings that line the squares.

11.35 The approach to building height and massing takes into account the following unique characteristics of the Site:

- **Site Geometry** – the Site has an unusual urban condition, due to its long linear east-west length, relative to its narrow width, and its boundaries with railway tracks to both the north and the south. The railway tracks provide an off-set of approximately 80-100m north and south to the nearest Site neighbours.
- **Topography** – the topography places the majority of the Site within a basin which is approximately 7m below both Finchley Road and West End Lane. The Site geometry and topography provide an opportunity for the provision of height within the Proposed Development.
- **Sun-path and orientation** – the overview strategy to height is to place higher elements to the north of the Site and lower elements to the south. This allows maximum light penetration into the public realm and built form.
- **Views** – the height and massing has been informed by visual testing (by Tavernor Consultancy) from the surrounding area, taking into consideration key local views, with the intention of reducing visibility from the surrounding context and heritage assets;
- **Transport Links** – the Site is in a highly accessible location being close to considerable number of transport nodes (5 Stations including bus stops).

11.36 The massing of the Proposed Development intentionally introduces variation across the Site, responding to solar orientation as well as the Site's geometry and topography.

11.37 Within the northern massing, variation is introduced to provide points of height relieved by lower links within courtyard buildings, retaining sunlight and views between buildings to the south.

11.38 The proposed building heights and separation distances between plots allow for more evenly distributed height. The tallest buildings are situated at the edges of the Site,

adjacent to the large public spaces. The building heights along the Linear Park are setback, improving daylight to the courtyards.

11.39 Building heights on the edges of the Site are proposed to tie in with the heights of the existing local context:

- **Finchley Road** – on Finchley Road, the Proposed Development would knit into the existing Victorian terrace with a new terrace that sweeps into the new Town Square. Another terrace then completes the Finchley Road frontage.
- **West End Lane** – from West End Lane, the Proposed Development builds up from the smaller grain of West End Lane, gradually stepping up in height to the main body of the Site. This also acknowledges the more recent introduction of height forming part of the Nido development on Blackburn Road.

11.40 For the Detailed Proposals, the proposed building heights are specified within AHMM's submitted DAS. In respect of the Detailed Plots, northern Blocks N4A, N4C, N5A and N5C are all between 13-15 storeys. Southern Blocks N4B, N4D, N5B and N5D vary between 9-10 storeys reflecting the approach of providing lower building heights to the south of the Site. Block N3E is proposed to be 10 storeys, providing variation between the massing of the adjacent buildings.

11.41 The massing of the Detailed Proposals maximises sun penetration into the courtyards and the apartments around them. Keeping the link blocks between N4A and C, and N5A and C significantly lower, means the buildings would be seen as a cluster rather than as a single volume. Block N3E stands on its own, facing a community garden, while the buildings on Plots N4 and N5 define courtyards, with N5A, C and D, and N4A, C and D defining two sides of a courtyard each. In both cases, the 'pavilion' buildings N4D and N5B define a third side to the courtyards with the fourth, south, side open to the sun.

11.42 For the Outline Proposals, building heights are controlled by the maximum building heights (AOD) specified within the submitted parameter plans. Generally, the building heights for the Outline Proposals which follow a similar approach to the Detailed Proposals.

d) Building Typologies

11.43 A number of different building typologies are proposed across the masterplan, as follows:

- Courtyard Buildings – N1, N2, N3 N4A, B and C, N5A, B and D, and N7
- Pavilion Buildings – N3E and N6
- Mansion Buildings – N4D and N5B
- Terraces – N1, S1 and S8
- Kiosks – 3 no. along southern Site perimeter

11.44 Further detail is provided on the building typologies below.

11.45 Those blocks which form part of the Detailed Proposals have been designed in full. The design codes identify which building typologies are proposed for the relevant outline plots, but the detailed design of the Outline Proposals would come forward at the reserved matters stage in accordance with the design codes and parameter plans.

11.46 **Courtyard Buildings** – N4 and N5 which form part of the Detailed Proposals, are proposed to be courtyard buildings, with reference taken from nearby landmarks such as St John’s Court on Finchley Road. This existing buildings set a precedent for large buildings with retail and other uses on lower floors in a podium, and upper levels providing apartments around courtyards (above the podium). The courtyard buildings proposed on Plots N4 and N5 update the local typology of courtyard buildings. Their designs adapt the architectural language of these blocks, with the facades modelled by balconies and bay windows, clear articulation of horizontal and vertical lines, and imaginative use of brick. This building typology is well suited to the provision of a mix of uses as its base is different to its upper floors and each side of the courtyard can have different access, internal layout and architectural detail. Further information on the design detailing of the courtyard buildings for Plots N4 and N5 can be found with AHMM’s DAS.

11.47 Courtyard buildings are also proposed for Plots N1, N2, N3 and N7 forming part of the Outline Proposals. The building typologies for these plots are secured within the Design Codes.

- 11.48 **Pavilion Buildings** – within St John’s Wood, Hampstead and West Hampstead, there are a number of buildings which are marked as special through their architectural treatment (such as Regency Lodge, Eyre Court, Oslo Court on Prince Albert Road and Imperial Court in St Johns Wood). Cues have been taken from the architectural composition and detailing of these buildings in designing the pavilion buildings forming part of the Proposed Development. Blocks N4D and N5B within the Detailed Proposals are proposed to be pavilion buildings. Both are freestanding above the podia on adjacent plots. The composition means that the apartments above the podium are both connected to those in the adjacent buildings. With independent cores, they can have different layouts to provide for a mix of different tenures whilst providing a variety of architectural expression, grounded in the public realm. The form, together with the subtle twist from the orthogonal plan grid of each improves views and light penetration into the courtyards and the apartments. Further information on the design detailing of the pavilion buildings for Plots N4 and N5 can be found within AHMM’s DAS.
- 11.49 A pavilion building is also proposed for Plot N6 forming part of the Outline Proposals. The building typology for this plot is secured within the Design Codes.
- 11.50 **Mansion Buildings** – there are numerous mansion block typologies within close proximity to the Site. These include Edwardian mansion blocks (such as Arkwright Mansions on Finchley Road) which achieve significant richness of architectural expression in single facades. A mansion building is proposed for Plot N3E which is a free-standing single block, smaller than its neighbours. The relatively small footprint of the mansion block means a single core can provide access to all apartments on each floor. The bay treatment to elevations means that all apartments benefit from dual aspect views. The main entrance is on the northern elevation along Blackburn Road, which differs in design to the southern elevation fronting the Linear Park. Further information on the design detailing of the mansion building for Plot N3E can be found within AHMM’s DAS.
- 11.51 A mansion building is also proposed for Plot N6 forming part of the Outline Proposals. The building typology for this plot is secured within the Design Codes.
- 11.52 **Terraces** – terrace buildings are proposed for Plots N1, S1 and S8 forming part of the Outline Proposals. Accordingly, this building typology has not yet been designed in

detail. However, terrace buildings are proposed to respond sensitively to the adjacent context on the east and west ends of the Site relating more closely to the high street contexts of Finchley Road and West End Lane. Buildings of this typology would generally have a differentiated roofscape i.e. pitched or expressed, rather than flat.

e) Materials

- 11.53 In order to determine an appropriate material palette for the development, consideration has been given to the predominant brick and masonry colouration in the surrounding area. There are variations in colour, tone and texture within the local context with selective use of ornament.
- 11.54 With the Proposed Development, different shades of brick would define the identity of individual blocks to tie in with those used locally and give recognisable character to their forms. Colouration would shift in tone, using colours to tie into existing context to the east and west. Red tones of brickwork would be used towards Finchley Road and London stock brick towards West End Lane. This would then transition to lighter hues within the centre of the Site.
- 11.55 Within the Community Green character area, around the western end of the Site, brown and buff brick predominates. Its role is as a background material which is reinforced by simple white finishes to some details, such as balcony fasciae and window lintels. The Detailed Proposals set a pattern which the design for the buildings within the Outline Proposals would reflect. The materiality and the detailed design of these Outline plots would come forward at the RM stage. The selective use of a palette of features, which is being developed for the Detailed Proposals and is included in the Design Codes, would allow for a great detail of variety in materiality and design and would follow through to the Residential Neighbourhood character area materiality summarised below.
- 11.56 Given the position of the residential character area in the centre of the Site, and without immediate neighbours to provide visual cues, the designs here draw on imagination, tempered by experience, to create interest through a wide variety of design detailing within an overall coherent identity. Bricks in this location would be in

the middle of the spectrum of colour (from buff to red). It is considered that the materials would be agreed with LBC through appropriate conditions.

11.57 The Town Square character area would draw its character from the bustle of Finchley Road and the amenities along it. Many of the buildings along Finchley Road are red brick with stone dressing, which the designs would develop into a series of features creating connections between the new and old fabric. Notwithstanding this, a range of colours, textures and other effects in the brickwork is proposed in line with the Outline Application Framework and to be determined at the RM stage.

11.58 It is considered that the materials proposed respond well to the surrounding context and the different architectural materials and styles to ensure alignment of the Site with its surroundings.

f) Inclusivity

11.59 An Access Statement has been prepared by David Bonnett Associates and forms part of AHMM's DAS submitted in support of the Application. The Proposed Development has been designed to ensure that a good level of inclusive design would be achieved by the finished scheme.

11.60 Across the Site, 10% of the homes are designed to be wheelchair accessible. For the Detailed Proposals, these units are distributed across the three plots and across all three of the tenures (market, intermediate rent and low-cost rent). In Plots N4 and N5 the accessible homes would be located within the north of the blocks to reduce the distance for residents to travel between the Blackburn Road drop-off and their apartments. They would be stacked in one position on the plan of each block, on every level, and would meet Part M Building Regulations. Further detail on the location of the accessible units within the Detailed Proposals is set out within AHMM's DAS.

11.61 The key access provisions for the Proposed Development are as follows:

- Incorporation of the principles for inclusive design wherever possible;
- Improved level access permeability through the Site with accessible routes to all connections with local pedestrian routes and public transport;

- New external slopes and stairs on publicly accessible pedestrian routes would be designed in accordance with Building Regulations;
- All new public realm, pedestrianised areas and landscaped areas would be designed for comfortable use by residents and local people, with step free access to all amenity areas;
- Safe spaces and routes for pedestrians and cyclists, segregated from vehicle traffic, would be provided;
- Provision of 17 car parking spaces suitable for wheelchair users, which equates to 3% of the dwellings;
- Accessible cycle parking spaces for residents, staff and visitors;
- Inclusion of mobility scooter parking;
- Wheelchair-accessible sanitary facilities alongside office cycling facilities, and at all staffed reception areas;
- Step-free access to all part of the buildings including balconies and roof terraces;
- 90% of dwellings designed to meet Building Regulations M4(2);
- 10% of dwellings designed to meet Building Regulations (M4(3);
- Access to a second lift for all residents of wheelchair accessible homes at upper levels; and
- Emergency evacuation strategy for disabled people to include an evacuation lift per core.

11.62 Accordingly, it is considered that the Proposed Development would comply with the inclusive design principles and policies set out above. For further details, please refer to the Access Statement included within the DAS.

Conclusion

11.63 Overall, it is considered that the Proposed Development is of a high quality that has been developed with close regard to the surrounding context in terms of scale, massing and orientation whilst taking advantage of the Site's unique characteristics in terms of topology, aspect and significant distance to adjacent properties (north-south). The proposed buildings, and the public spaces and streets between them, would create an attractive and distinctive place of exemplary design. The proposals

therefore fully comply with the NPPF, London Plan and Local Policies, Design and Access CPGs and the Neighbourhood Plan.

12 Heritage, Townscape and Views

- 12.1 This section assesses the Proposed Development within the context of its historic environment and the statutory duty to have special regard to the desirability of preserving the listed buildings, their settings, or any features of special architectural or historic interest, and conservation areas. This chapter sets out the significance of the designated and non-designated heritage assets (the adjacent conservation areas and surrounding listed buildings) in order to inform an assessment of the proposals according to the criteria set out in the NPPF in relation to harm and benefit. The proposals are then considered against relevant national, regional and local heritage planning policy and guidance.
- 12.2 A full analysis of the impact of the proposed development on designated heritage assets is included within the submitted Townscape, Visual Impact and Heritage Assessment (“TVIHA”), prepared by the Tavernor Consultancy and submitted as part of the application and should be read alongside this Section of this Statement.

Policy and Statutory Context

- 12.3 Section 66(1) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 12.4 Section 72 of the 1990 Act also provides that, in respect of development affecting conservation areas, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.
- 12.5 The Government has attached great importance to conserving and enhancing the historic environment at Chapter 16 of the NPPF.
- 12.6 Paragraph 194 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail

should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

- 12.7 As a minimum, the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 12.8 Paragraph 197 of the NPPF states that in determining planning applications, local planning authorities should take account of:
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities including their economic viability; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 12.9 Paragraph 199 states that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- 12.10 Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 12.11 The NPPG on Conserving and Enhancing the Historic Environment provides further guidance in assessing the impact of development proposals which effect heritage assets. It sets out that "significance" derives not only from a heritage asset's physical presence, but also from its setting. It sets out that "Public Benefits" may follow from

many developments and could be anything that delivers economic, social or environmental objectives as described at Paragraph 8 of the NPPF.

- 12.12 London Plan policy HC3 states that Strategic Views include significant buildings, urban landscapes or riverscapes that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view. Further guidance is set out within the London View Management Framework (LVMF).
- 12.13 Policy D2 of the Local Plan states that the Council will preserve, and where appropriate, enhance Camden's rich and diverse heritage assets and their settings. In respect of designated heritage assets, the Council will not permit development that results in harm that is less than substantial to the significance of a designated heritage assets unless the public benefits of the proposal convincingly outweigh that harm.
- 12.14 In respect of archaeology, the policy states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.
- 12.15 Policy 3 of the Fortune Green and West Hampstead NP sets out that development that enhances or preserves Conservations Areas and heritage assets in the neighbourhood area as well as their distinct character, appearance, and setting will be supported. The policy goes on to outline that those proposals which detract from the special character, and/or, architectural and/or historic significance, and setting of Conservation Areas and heritage assets in the Area will not be supported.

Assessment

- 12.16 The height and massing of the Proposed Development has been informed by visual testing from the surrounding area. Townscape and heritage consultants, Tavernor Consultancy, and visualisations specialists, Cityscape, identified a range of key townscape views which were agreed in consultation with the planning officers at LBC. Key views were identified, whilst taking into consideration conservation area appraisals, site visits and discussions with planning officers. Consultation on the

proposed design and the impact on the surrounding heritage assets has also been undertaken with Historic England.

- 12.17 The accompanying Townscape, Heritage and Visual Impact Assessment (THVIA) prepared by Tavernor Consultancy includes a full map of views that were both assessed in detail and tested as part of the design development process. A detailed assessment of the impact of the Proposed Development on the character of the surrounding townscape and the significance of surrounding heritage assets is included within the THVIA.
- 12.18 In assessing surrounding heritage assets, the THVIA has taken into consideration conservation areas where all or part falls within 500m of the Site, listed structure, registered landscapes and above ground Scheduled Monuments where all or part falls within 500m of the Site and non-designated heritage assets (locally listed buildings) where all or part falls within 500m of the Site.
- 12.19 The THVIA identifies that the Proposed Development would significantly enhance the townscape character of the Site through creating a new residential neighbourhood with a variety of mixed commercial, retail, leisure and community uses, set around a series of public green spaces, and connected by a high-quality and legible landscaped route which clearly connects Finchley Road to West End Lane. This new route would be located along the southern boundary of the Site to provide an open character and it would considerably enhance pedestrian permeability throughout the local townscape. The emphasis on landscaping and greenery would respond positively to the green character of the residential suburbs which characterise the townscape surrounding the Site in all directions. Three new public green spaces, varying in their character, would provide new high-quality public realm for both new residents within the Site and existing residents from surrounding neighbourhoods,
- 12.20 The height and scale of the Proposed Development has been designed to respond to the character of the surrounding townscape and heritage sensitivities. This has informed the overall heights and arrangement of the massing across the Site to minimise visibility and impacts from the surrounding conservation areas, and to respond to the character and scale of the two Town Centres at either end of the Site. Design Code requirements for the plots closest to Finchley Road (Plots N1 and S1)

and West End Lane (Plot S8) are for these parts of the Proposed Development to be terraced and have articulated roof profiles to tie into the existing townscape.

- 12.21 The height, scale and arrangement of the remaining plots within the bulk of the Site further responds to the surrounding townscape by forming a varied skyline of individual vertical elements to reduce a sense of uniformity. The tallest buildings would be placed on the northern edge of the Site with the building heights stepping down to the south. This approach responds appropriately to the sensitivity of the designated townscapes surrounding the Site, such as the South Hampstead Conservation Area to the south.
- 12.22 The proposed heights have also been informed by LVMF view 5A.2 from Greenwich Park as the Site lies within the Background Wider Setting Consultation Area (albeit some 5 miles from St Paul's Cathedral). The Proposed Development responds to the constraints of the protected view and its associated guidance, ensuring that it would result in no harm to the ability to recognise and appreciate St Paul's Cathedral as a landmark in the view.
- 12.23 The Detailed Proposals are of high-quality architectural design and have a clear architectural coherence which draws upon the established character and building typologies which dominate the surrounding townscape. The Detailed Proposals are predominantly brick-built and the materials palette is predominantly buff and brown with white brick architectural accents. This is reflective of the materials and colour palette which are typical of the surrounding townscape, ensuring that the Proposed Development would be visible as a sensitive and high-quality addition to the skyline. The Design Code provides recommendations on the materials and colouration for the Outline Plots, and states that they must respond to the character and appearance of the surrounding townscape.
- 12.24 The THVIA concludes that the Proposed Development would result in significant townscape benefits to the immediate locality and has been sensitively designed to respond to the surrounding heritage context, to ensure that it does not result in any harm to the significance of surrounding designated and non-designated built heritage assets, or an ability to appreciate their significance. It would result in the comprehensive regeneration of the Site and forms a significant part of unlocking the potential of the West Hampstead Interchange Growth Area, significantly transforming

and enhancing the townscape through the creation of a new residential neighbourhood and the introduction of high-quality architecture, public realm, new uses and greatly improved pedestrian permeability and connectivity for the local population in the form of a landscaped Linear Park.

12.25 Historic England (HE) provided a pre-application response on the Proposed Development on 16 December 2021 confirming no objection to the redevelopment of the Site. The responses states that the buildings proposed on the Site are substantially greater than that found within the conservation areas and would appear in some views from within them and out of them. The volume and scale of the development means that there remains a harmful impact to designated heritage assets through development within their setting. However, the response goes on to state that this harm would be less than substantial as defined in the NPPF. The less than substantial harm that HE considers results from the Proposed Development should be weighed against the clear and significant public benefits resulting from the redevelopment of this important Site.

12.26 If it is asserted that less than substantial harm would result from the Proposed Development, the considerable public benefits package set out in chapter 18 of this Statement would convincingly³¹ outweigh any less than substantial harm and the balance would be tilted towards the presumption in favour of sustainable development.

12.27 Accordingly, the Proposed Development is considered to accord with relevant statute and planning policies at all levels.

³¹ A set out in LBC Local Plan (2017) Policy D2 'Heritage'

13 Landscape, Public Realm and Trees

- 13.1 This section considers the public realm and landscaping in respect of the Proposed Development. It does not consider the proposals associated with vehicular movements, traffic flow or cycle routes which are covered within Section 15 in detail.
- 13.2 Paragraph 152 of the NPPF states that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change and can help to reduce greenhouse gas emissions, such as through its location, orientation and design.
- 13.3 Policy G1 Part D of the London Plan requires that development proposals include appropriate elements of green infrastructure, such as street trees, green roofs, and natural or semi-natural drainage features.
- 13.4 Policy G5 of the London Plan sets a new requirement for major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature based-sustainable change. The policy advises boroughs to set their own scores but advise 0.4 for developments that are primarily residential, providing details on how this score is calculated.
- 13.5 At a local level, Camden Local Plan Policy A2 Open Space seeks to protect and enhance access to open space and green infrastructure within the Borough. Policy A2 (M) states that new development proposals within the LBC will be required to apply a standard of 9 sqm per occupant for residential schemes and 0.74 sqm for commercial developments. The CPG mirrors the open space requirements set out in Policy A2 and the London Plan standards on play space, which seeks 10sq. m per child.
- 13.6 Local Plan Policy A2 is supported by Camden's Planning Guidance (CPG) document "Public open space" (January 2021). The CPG noted that playspace should be calculated in addition to open space. It does however make an exception to the policy by recognising that the 9sq. m of open space per resident would, reasonably, already include an

allowance for play provision and consequently the Council will seek an additional 6.5sq. m per child (instead of the 10sq. m per child).

- 13.7 Local Plan Policy A2 (N) states that priority will be given to securing new public open space on-site, with provision off-site near to the development only considered acceptable where provision on-site is not achievable. If there is no realistic means of direct provision, the Council may accept a financial contribution in lieu of provision.
- 13.8 Paragraph 6.49 of the Local Plan specifically references the use of financial contributions to create useable spaces such as widening of pavements as it is identified that this can often be a challenge in densely developed areas.
- 13.9 Policy 17 of the Fortune Green and West Hampstead NP sets out that development shall protect and improve, where appropriate, existing green/open space. It also sets out that development that increases the demand for recreation or amenity shall provide for new green/open space.

Assessment

- 13.10 A detailed Landscaping Statement has been prepared by East and is included within the DAS submitted as part of the Application. A summary of this and how it accords with policy is set out below.
- 13.11 A detailed assessment of the open space and playspace is set out in section 10 of this Statement.
- 13.12 The vision for the landscaping proposals is to create one shared landscape in which the architecture and the landscape are in dialogue to achieve the following key objectives for the Site:
- Linear movement and flow between the connecting communities
 - Visual connectivity
 - Locally distinctive identity
 - Democratic space
 - Social vitality

13.13 As set out in Section 11 above, the Proposed Development has been designed around the concept of three character areas – the Town Square (off Finchley Road at the eastern part of the Site), the Residential Area (located in the central part of the Site) and the Community Green (located in the western part of the Site), these are linked by a Linear Park running from east to west along the southern edge of the Site which provides a new pedestrian focussed connection through the Site. Along the journey, pedestrians will pass through the different character areas which define the various spaces and intended uses.

13.14 The principal public realm areas that form part of the Proposed Development are as follows:

- Central Square (circa 1,763 sqm) – forming part of the Detailed Proposals, this is located at ground floor level directly to the south of Plot N3E and seeks to provide a range of uses and sensory spaces. Both play and gardening can happen adjacent to one another with a multitude of community uses through the gridded pattern, which enables adaptation with ease over time
- Linear Park (circa 6,457sqm) – the Linear Park falls within both the Outline and Detailed Proposals and provides a naturally green edge or corridor running along the southern extent of the Site and is the main pedestrian and leisure cycle only east-west link running through the Site, connecting Finchley Road with West End Lane. Along its length, the fence offers playful additions that form incidental playspaces as well as trees and bio-diverse planting.
- Town Square (Circa 31,00sqm) A Triangular Square at the eastern part of the Site in the commercial area of the Site;
- Community Green (circa 3,570sqm) – the public green is a large open green space within the Outline Proposals that hosts a more paired back level of planting at its centre. This is a predominantly green space with large grassy areas suitable for picnics, children’s play, social gatherings etc. A MUGA is provided adjacent to the Community Green.
- Billy Fury Yard (circa 1,619sqm) – provides a key civic space adjacent to the health centre. Along with the Granny Dripping Steps mini square, the two squares provide a key pedestrian and cyclist friendly route that joins Blackburn Road from east to west across the Site.

13.15 The Proposed Development also incorporates a number of private amenity spaces as follows:

- Balcony/garden – each residential unit would have its own private amenity space in the form of balcony or a ground floor front garden.
- Podiums– forming part of both the Outline and Detailed Proposals, the podiums provide shared private amenity space for residential occupiers at podium, 1ST floor level between blocks. The podiums have a natural feel and the landscape is simple, yet seasonally rich by carefully chosen planting palettes, including younger children’s safe play space. Private and shared amenity areas are denoted by generous buffer zones of planting, offering privacy and greenery. Some soft mounds create natural furrows and allow for sufficient soil volume for tree planting.
- Roof terraces – forming part of both the Outline and Detailed Proposals, the roof terraces provide shared private amenity space for residential occupiers. The terraces provide long vistas south to the Linear Park and beyond.

Trees

13.16 Policy G7 of the London Plan states that trees should be protected, and where new trees are planted, this should be in appropriate locations. Therefore, developments should aim to protect trees where possible and if this is not possible, adequate replacements are required.

13.17 Camden Local Plan Policy A3 states that the Council will protect, and seek to secure additional, trees and vegetation. Specifically, Policy A3 stipulates that the Council will [inter alia]:

- **“expect replacement trees or vegetation to be provided where the loss of significant trees or vegetation or harm to the wellbeing of these trees and vegetation has been justified in the context of the proposed development**
- **expect developments to incorporate additional trees and vegetation wherever possible”.**

13.18 Camden has published a Trees CPG which highlights the Council's aim to preserve existing tree and canopy coverage where possible as well as increase and improve tree coverage in the design of new developments and through planning contributions.

13.19 Policy 18 of the Fortune Green and West Hampstead NP requires development to protect trees in good health that contribute to the character of the neighbourhood area, individual streetscapes, and green spaces.

Assessment

13.20 The Application is supported by an Arboricultural Impact Assessment (AIA), prepared by Pell Frischmann. The report seeks to inform the Proposed Development identifying impacts and mitigation required.

13.21 The AIA survey identified 110 individual trees on the Site, and one group of trees (trees that form cohesive arboricultural features, either aerodynamically, visually or culturally), comprising of a total of nine species. The trees have been categorised as follows:

- Category A – 5 trees
- Category B – 47 trees
- Category C – 56 trees
- Category U – 2 trees

13.22 Category A London plane trees along Billy Fury Way would be incorporated into the scheme design and would remain in-situ during development. The majority of the trees within the centre of the Site would be removed during development, including Category B trees. Where possible, Category B trees would be retained but, where this is not possible, the trees would be replaced as part of mitigation tree planting within the landscape plan.

13.23 The AIA notes that the Proposed Development should take the Root Protection Area (RPA) of trees and groups of trees into consideration. The design team have taken and would continue to take into consideration the ways in which Category A and B trees can be safely retained during both the construction and operational phases.

13.24 A number of trees throughout the site have been highlighted as 'Anchor Trees'. These trees will be planted as mature trees to enable the embedding of green infrastructure in

the site and an immediate home for wildlife to occupy. These anchor trees provide a basis upon which semi-mature trees can then develop and offer further biodiverse rich spaces for an elongated lifespan. Anchor trees have been chosen to engage with specific views around the site, providing visual links to spaces beyond the edges of buildings and emphasise the depth of streets. Their positions provide environmental benefits of shade and noise attenuation from the railways adjacent. Some specimens are to be chosen in order to be planted at semi-maturity from day one.

- 13.25 Whilst there may be some loss of trees as a result of the Proposed Development, this would be minimised as far as possible and where necessary mitigation would be provided. Accordingly, it is considered that the proposals accord with the relevant planning policies. Further information can be found in Chapter 6 of the DAS.

14 Energy and Sustainability

- 14.1 This section assesses the proposed energy and sustainability strategy and its acceptability in planning policy terms. It concludes that the Proposed Development is highly sustainable in accordance with relevant adopted and emerging planning policies.
- 14.2 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- 14.3 NPPF paragraph 119 encourages development that makes as much use as possible of previously developed or 'brownfield' land.
- 14.4 NPPF Paragraph 152 sets out that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.
- 14.5 Paragraph 153 of the NPPF states that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.
- 14.6 The London Plan sets out the Mayor's vision to ensure that London becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy, consuming fewer resources and using them more effectively.
- 14.7 As identified in London Plan Policy SI 2, major development should be net-zero carbon. This means reducing greenhouse gas emissions in operation and minimising energy demand in accordance with the following hierarchy:
- 1) Be lean: use less energy and manage demand during operation
 - 2) Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly

- 3) Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 - 4) Be seen: monitor, verify and report on energy performance.
- 14.8 Policy SI 2 (c) of the London Plan sets a minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures.
- 14.9 Policy SI 3 of the London Plan requires energy masterplans to be developed for large-scale development locations which establish the most effective energy supply options.
- 14.10 Policy SI 7 focuses on reducing waste and supporting the circular economy. The Mayor seeks to achieve resource conservation, waste reduction, increases in material re-use and recycling and reductions in waste going for disposal.
- 14.11 At a local level, Local Plan Policy CC1 requires all development to minimise the effects of climate change and encourages developments to meet the highest feasible environmental standards that are financially viable during construction and occupation. Moreover, all development is required to reduce carbon dioxide emissions in line with the targets set out within the London Plan. The policy requires all proposals for substantial demolition to demonstrate that it is not possible to retain the existing building.
- 14.12 Local Plan Policy CC2 requires all development to be resilient to climate change through the adoption of appropriate climate change adaptation measures. Local Plan Policy CC2 also promotes the incorporation of sustainable design and construction measures within developments.
- 14.13 In January 2021, the Council published the Energy Efficiency and Adaptation CPG. The CPG has been prepared to support the policies of the London Plan (2021) and the Camden Local Plan (2017).
- 14.14 In 2020, LB Camden published the Camden Climate Action Plan (2020-2025) which sets out the Council's ambition for a zero carbon Camden by 2030.

Assessment (Energy)

- 14.15 An Energy Strategy has been prepared by Hoare Lea and is submitted in support of this Application.
- 14.16 The Energy Strategy for the project is a key part of the sustainability strategy, considered from the start of the project and is central and integral to the proposals. The overarching strategy is to provide a simple, future-proofed approach to energy efficient and low carbon buildings. The strategy seeks to utilise current technologies while providing flexibility for future technologies and policy developments.
- 14.17 The Energy Strategy for the Site adopts a fabric first approach, with good level of insulation, efficient systems and controls, and the use of Air Source Heat Pump (ASHP) technology, supplemented with photovoltaic (PV) panels where feasible on roof spaces. The strategy has been developed to ensure that the Proposed Development is both efficient and economical by reducing heating demand in the first instance and then meeting the remainder through highly efficient means.
- 14.18 The electricity-led strategy would result in not only a low carbon scenario as of today, but continuous improvement as the grid continues to decarbonise. This approach would also enable the Proposed Development to be combustion free, facilitating a shift towards clean energy systems, with the associated benefits in local air quality and human health.
- 14.19 Space would be provided with the development for inclusion of a connection to a site wide heat network, should a future connection become available in the area. This space provision also allows for future conversion to an ambient loop system to enable energy to be shared within and between buildings, and to import or export heat to or from the Site. In this way, futureproofing is at the core of the proposed strategy to reduce energy demand and carbon emissions during the operational lifespan of the development.
- 14.20 The Energy Strategy for the Outline Proposals, utilising SAP10 carbon factors, is summarised below in the context of the energy hierarchy:

- Be Lean – targeting 10-15% reductions in regulated carbon emissions against Part L baseline for domestic and non-domestic uses respectively. High energy efficient building fabric and building services would be utilised to reduce carbon emissions and energy demand through good practice passive design measures.
- Be Clean – it is not anticipated that further carbon emission reductions would be made through Be Clean measures. The incorporation of onsite district heating and a CHP system has been deemed to be unsuitable as it would offer no benefit to the Application. Therefore, a heat network and CHP technology has been discounted. Space would be provided for inclusion of a site wide heat network, or for conversion to an ambient loop system in the future.
- Be Green – targeting a cumulative 53% sitewide regulated carbon emissions reduction against Part L baseline via high efficiency Air Source Heat Pumps and Rooftop PVs.
- Be Seen – energy consumption would be monitored and reported to a level of granularity consistent with the Be Seen requirements. Effective energy metering in line with Be Seen requirements would be enabled by the provision of suitable infrastructure within the buildings services systems.

14.21 Through the measures outlined above, it is anticipated that overall, a circa 53% reduction in CO₂ emissions could be achieved beyond the ‘gas boiler baseline’ for the Outline Proposals.

14.22 Notwithstanding the carbon savings of the Outline Proposals, the zero-carbon target shortfall (accounting for the on-site savings) is likely to result in a carbon offset payment. The specific offset payments for the Outline Proposals would be subject to reserved matters applications at the relevant stage in the project.

14.23 For the Detailed Proposals, the specific design proposals have been fully assessed using the Part L methodology and specific carbon reduction percentages (rather than ranges) calculated:

- Be Lean - the Detailed Proposals are anticipated to achieve up to a 13% site-wide reduction in CO₂ emissions beyond the Building Regulations

Part L 2013 'baseline' through the inclusion of efficient building fabric as well as energy efficient lighting and ventilation. This consists of a 12.8% residential reduction and 17.3% non-residential reduction. This exceeds policy requirements by 2.8% for residential and 2.3% for non-residential elements respectively.

- Be Clean – an investigation into the availability of existing and proposed district heating networks has been carried out for the Proposed Development, as set out above in respect of the Outline Proposals. Given that there are currently no available district heat network connections that can be utilised and the relative merits of installing a CHP are negligible due to the decarbonisation of the UK electricity grid, there are no further CO₂ savings proposed at the 'Be Clean' stage of the hierarchy.
- Be Green – an investigation into the availability of low and zero carbon technologies has been carried out, which concluded that ASHPs and PVs were the most suitable technologies. The inclusion of ASHP and PVs is expected to lead to a further 53.3% site-wide reduction in CO₂ emissions beyond Part L (made up of a 67.8% reduction for residential elements and a 34.6% reduction for non-residential elements). This far exceeds the policy position of a minimum of 35% reduction over Part L baseline.³²
- Be Seen – energy consumption would be monitored and reported to a level of granularity consistent with the Be Seen requirements. Effective energy metering in line with Be Seen requirements would be enabled by the provision of suitable infrastructure within the buildings services systems.

14.24 Overall, it is anticipated that the Detailed Proposals would achieve in the region of a 66.3% reduction in CO₂ emissions beyond the baseline, through ASHPs and PVs. The development is proposed to deliver buildings which are very energy efficient, resulting in a reduction in energy consumed and carbon emitted by the Site. It would also target improvements over what is required by Building Regulations.

³² See figure 1 and 13 in Energy Strategy.

14.25 Notwithstanding the carbon savings of the Detailed Proposals, the zero-carbon target shortfall (accounting for the on-site savings) is likely to result in a carbon offset payment for the Detailed Proposals of circa £828,345 (which consists of £755,382 for the residential elements and £72,963 for the non-residential elements). Specific offset payments for the Outline Proposals are subject to reserved matters applications for each individual building.

Assessment (Overheating)

14.26 In respect of overheating, the design has followed the cooling hierarchy principles as a means of reducing the amount of solar and internal gains, reducing the risk of overheating and subsequently reducing the demand placed upon the systems to condition the space.

14.27 Within the representative sample apartments that have been assessed, it can be confirmed that they would achieve compliance with the Building Regulations Part L 2013 Criterion 3 and limit the effects of heat gains in summer months and reduce the demand on active cooling systems. The assessment carried out for a sample of dwellings demonstrates that 86% of assessed spaces are anticipated to meet the thermal comfort criteria through passive design measures alone. Additionally, mechanical ventilation systems with air tempering to lower peak temperatures would be provided to the residential units where required to manage internal temperatures when occupants choose to leave windows closed.

14.28 The flexible commercial spaces are notionally modelled as retail, office and community use spaces. For these elements, the low solar transmittance proposed for the glazing results in a marginally higher cooling demand compared to the notional building. This would be explored further at the detailed design stage.

Assessment (Sustainability)

14.29 A Sustainability Strategy, Circular Economy Statement and BREEAM Target Assessment have been prepared by Buro Happold and are all submitted in support of this Application.

14.30 The Sustainability Strategy has been developed around the following key themes which are outlined in the context of the scheme proposals below.

1. Embodied Carbon, Circular Economy, Material Efficiency and Waste

14.31 The target is to reduce the emissions associated with the construction of the buildings from inception to practical completion. In order to do so, a pre-demolition audit would be undertaken of Homebase and the O2 Centre to inform material reuse strategies. The landscape design would reuse existing materials where possible. A materially efficient column grid is proposed for the residential building and post-tension slabs would be used in the building design, involving less concrete than Reinforced Concrete Flat slabs, thus reducing embodied carbon emissions. Ground Granulated Blast-furnace Slag (a waste product) would be used in the concrete mixes to replace at least 50% of the cement used in concrete building elements. Further detail is provided in the submitted Circular Economy and Sustainability Statements prepared by Buro Happold.

2. Operational Energy and Carbon

14.32 The proposals are for a fabric first approach providing the most robust and effective measures for reduction of carbon emissions including high standards of fabric performance. The scheme provides a development that is both comfortable for occupants and addresses issues such as fuel poverty through reduced running costs. PVs have been maximised on the roofs to provide renewable energy on Site. The proposals are for an all-electric strategy to deliver heat across the Site, making significant savings in carbon emissions now and further savings as the national grid decarbonises. The Detailed Proposals would achieve a 66.3% site wide carbon reduction over Part L baseline and the Outline Proposals would achieve a 53% site wide carbon reduction over Part L baseline.

3. Climate Change Resilience

14.33 The masterplan must be prepared to be resilient to shocks and stresses that may be anticipated with forecast changes in the future climate. The overheating risk has been mitigated for 86% of rooms through the combined use of Mechanical Ventilation with Heat Recovery (MVHR) and openable windows, providing occupants with the control

to adapt to their internal environments. Potential community growing opportunities are provided within the landscape design. A holistic drainage strategy incorporates rain gardens and swales and includes an allowance of 40% for the effects of climate change. The tree strategy includes taller and smaller trees and shrubs in a mix of evergreen and deciduous clusters to mitigate wind, provide shade, and shelter from the external environment.

4. Biodiversity

14.34 The proposals seek to increase the abundance and diversity of plant and animal species appropriate to local ecology. The existing Site has minimal features of biodiversity value. East have worked closely with the London Wildlife Trust to maximise the biodiversity opportunities across the proposed development. The Proposed Development targets a Biodiversity Net Gain of >165.4% and an Urban Greening Factor (UGF) of 0.39 (for the Detailed Proposals) through extensive green open space including green walls, flower rich perennials, hedging and ground cover planting. Within the landscape design, 50% of the provision would be for native species with circa 26% of the total Site to be provided as parks, squares and playspace. Local wildlife would be supported by bird boxes on the retained London plane trees, black redstart boxes located near green roofs and bug hotels in mini forests dispersed across the Site. Additional trees and vegetation are proposed across the public realm as part of the landscape design particularly running along the east-west corridors. The scheme targets a significant uplift in biodiversity net gain, creating, supporting and enhancing the local ecosystems.

5. Water and Surface Water Run-Off

14.35 The Proposed Development has been designed to consume less potable water on-site, both inside the buildings and in the public realm irrigation, and seeks to reduce water demand and maximise recycling and increase the resilience to surface water flooding. The Site is in Flood Zone 1 and at low risk of flooding from fluvial and tidal sources. The risk of flooding from runoff generated by the scheme is mitigated through the landscape design which incorporates SUDs and water management that allows for minimal water consumption from irrigation. Low flow fittings would be specified throughout the residential units to reduce demand on potable water as much as possible. Bioretention strips and rain gardens are proposed across the landscape

masterplan to catch rainfall from roofs and public realm, remove pollution and reduce run-off downstream. The Proposed Development achieves a 50% reduction in existing proven discharge rates and runoff volumes, reduced by 450m³ through measures such as 44% permeable open space to aid climate resilience to flooding by necessary and appropriate mitigation implementations.

6. Health, Safety and Well-being

- 14.36 The proposals have been designed to improve the mental and physical wellbeing of Site visitors, users and residents, as well as the wider community. The proposals would also achieve the highest standards of inclusive and accessible design, including for residents who were previously homeless, families, younger and older generations. The internal layouts and masterplan facilities are designed to encourage physical activity in line with WELL standards through active frontage and exterior active design, cycling and pedestrian routes. The scheme massing maximises dual aspect dwellings (90% of the low-cost rent homes), taking advantage of opportunities for daylighting and passive ventilation opportunities. The scheme meets the optimum indoor acoustic requirements in line with AVO guidance to balance risks across acoustics, ventilation and overheating. Overheating risk is mitigated for 86% of rooms through the combined use of MVHR and openable windows, providing occupants with the control to adapt to their internal environment. The Proposed Development would also provide circa 16,000sqm of community / commercial floorspace, including a new health centre.
- 14.37 The proposals would create increased green space and interaction with nature through integrating social prescribing opportunities (such as community garden spaces). The patchwork approach to the community garden square would allow for local stewardship of the public realm. Dedicated playspace would be provided across the Site for children ages 0-11 years old and youth spaces including a non-standard MUGA on the southern edge of the Site, ensuring open and inclusive provision for all children. The development would create a welcoming safe environment through security measures such as vehicular access and movement control, surveillance of key areas, public realm lighting for active and natural surveillance and operational security management.

7. Mobility

14.38 The Proposed Development has been designed to minimise the use of fossil fuel transport and would be car free (apart from 3% blue badge spaces, of which 20% electric vehicle charging points would be active and 80% passive), encouraging residents, users and visitors to access the Site by walking and cycling. The PTAL of the Proposed Development scores 6b across the whole Site, reflecting the highest levels of accessibility and the great connections provided via London buses, underground and overground lines. A new east-west step-free pedestrian and cycle only route would be created through the southern part of the Site, linking the western part of Blackburn Road with Finchley Road, increasing the permeability and enabling access to commercial units and onward access to other key destinations in the area. Space would be safeguarded and financial contributions made, for improvements to station access.

8. Air Quality

14.39 The impact of the development on air quality would be reduced through both a significant reduction in vehicular movements, through the removal of a 520 space car park, a significant increase in sustainable transport movements, and an all-electric strategy to deliver heat across the Site, making significant savings in carbon emissions, creation of a car free development reducing emissions on-site from combustion of fossil fuels, and encouraging the increased use of public transport. No combustion of fossil fuels would be used to generate energy on site – contractors would need to connect to electricity as soon as possible to minimise emissions from on-site machinery. Ventilation would be provided by MVHR units for all homes, to provide background fresh air without the need to open windows. Systems would filter incoming air to provide cleaner air all year round.

9. Social Value

14.40 The Proposed Development seeks to unlock value to the wider community through identifying opportunities throughout the design and construction process. The scheme would deliver at least 35% affordable housing, of which 60% would be Low-Cost Rent and 40% intermediate rent. Publicly accessible space forms 50% of the total Site area, including significant provision for landscaped public realm, playspaces and natural

green spaces. Provision is made for approximately 19,500sqm of community / commercial floorspace, including a new multi-disciplinary health centre up to 1,250sqm and 250 sqm community centre. The scheme would provide a public art strategy and public events programme which would be secured through the Estate Management Plan and the Applicant is committed to a long-term stewardship of the Site and its services.

Assessment (Whole Life Carbon)

14.41 The Proposed Development includes the demolition of a number of buildings, including the O2 Centre. Within the adopted West End Lane to Finchley Road SPD, under the objective of “a sustainable and resilient place”, it provides that substantial demolition and reconstruction should be fully justified in terms of the consideration of feasible and viable alternatives and optimisation of resources and energy use, in comparison with existing buildings, through a whole life carbon assessment.

14.42 The Sustainability Strategy includes a Whole Life Carbon (WLC) Assessment for the redevelopment of the O2 Centre, which compares the O2 Centre emissions associated with three different scenarios over a period of 60 years:

- 1) Considers a ‘Business as Usual’ scenario i.e. no changes to the existing Site and Centre, apart from the immediate replacement of MEP equipment currently nearing end of life, and assumes continued normal operation for a period of 60 years;
- 2) Same as scenario 1 but accounts for major refurbishment of the existing building after 30 years. This considers that the building is already approximately 30 years old and would require major works at this point in the future. This scenario does therefore look at both additional embodied emissions after 30 years, as well as the reduction in operational emissions.
- 3) Current masterplan proposal, which assumes removal of existing building to allow for a low energy residential development to be constructed (to include Plots N1, N2 and S1 as these are located where the existing O2 Centre sits). This scenario accounts for the carbon debt associated with the embodied carbon of the existing O2 Centre and includes this as a source of emissions in its’ WLC

calculation. The reduction in that debt from retention and on-site reuse of materials from the existing building is also considered, with scenarios for reuse assumed at both 50% and 70% of the total embodied carbon.

14.43 Scenario 1, the retention of the existing building, performs extremely poorly from an operational standpoint when compared to the other scenarios. The Operational Carbon emissions are around five times that of a new build alternative, with a floor area approximately 28% less. This is the result of high operational energy demands associated with the existing O2 Centre, as well as its fossil fuel reliance. This “do nothing” scenario is, however, not considered a viable scenario in reality, as the current layout of the O2 Centre is constrained by:

- Inefficient and outdated floorplates;
- An inefficient façade that does not positively contribute to the streetscape;
- Sustainability credentials that do not meet the requirements of modern commercial buildings; and
- A ground floor configuration that provides little in the way of ground floor activation and animation of the town centre.

14.44 Scenario 2 considers a major refurbishment for retail and leisure uses at the end of the current O2 Centre’s life, which is assumed to improve the building’s energy efficiency. This would result in additional embodied carbon emissions from the refurbishment. This results in a reduction to operational carbon demands to the extent that emissions are reduced over the 60-year period compared to Scenario 1. Whilst delivering the lowest WLC emissions, this Scenario retains the Centre in its current format for a further 30 years prior to refurbishment as new retail and leisure uses, with only minor replacements to building services and finishes occurring in the initial 30 years. It does not therefore address the issues and growing obsolescence of the Centre as set out above, with potentially wider social and sustainability implications.

14.45 Furthermore, what is not considered within the assessments for Scenarios 1 and 2 are the additional works that would realistically be required if the O2 Centre were to be retained. For example, substantial interventions would be required to align with the

West End Lane to Finchley Road SPD. These would have significant carbon costs that have not been accounted for in this Scenario:

- An improved mixed-use destination that would provide retail, leisure, working and community uses that attract local residents;
- An improved cycle and pedestrian entry route from Finchley Road, which would include improved crossing, wider footways, cycle lanes, greening and lighting;
- More active and engaging frontages, entrances and streetscapes on all public facing sides;
- A more open, clear and accessible route through the existing Centre; and
- A high-quality urban public space, that successfully integrates the new and old buildings and is designed for people rather than cars.

14.46 Scenario 3 considers the proposed approach, which includes the partial deconstruction of the existing O2 Centre and the construction of a new development. This scenario inherits the remaining carbon debt from the existing building and creates additional embodied carbon in the construction of the new development. However, it has significantly lower operational emissions than either of the two previous options due to modern energy efficiency measures and an all-electric, decarbonising supply. The proposal also takes into consideration the emissions saved through the reuse of elements from the existing O2 Centre. This has been calculated for different target levels, with the minimum target assuming approximately 50% of the embodied carbon to be retained (Scenario 3a), whereas the stretch target increases this to approximately 70% (Scenario 3b).

14.47 Assuming the minimum reuse target (Scenario 3a) this approach contributes a comparable overall WLC emission to that of Scenario 1. If the stretch reuse target were achieved (Scenario 3b), the WLC emissions of this approach are lower than Scenario 1 and marginally greater than those shown in Scenario 2. To achieve this stretch target, 100% of the substructure, approximately 60% of the superstructure and approximately 90% of the façade embodied carbon would need to be retained. Whilst this is a stretch target, deconstruction of the O2 Centre would be part of the latter phases of development. By this point strategies for material reuse and recycling are

expected to be more mature and advanced than current methods. This would need to be considered further at the point of any reserved matters application.

14.48 It should also be noted that from a holistic approach to sustainability, the carbon cost should not be read in isolation but weighed up against all the other sustainability credentials of the development – social and environmental. These could consist of all aspects from the biodiversity gains, land-use efficiency, or health and walkability aspects of a new proposal. Scenario 3 provides operational, public, and sustainability benefits which are not accounted for in a primarily quantitative comparison of WLC emissions. These include:

- Successfully unlocking a “backland” area for redevelopment which would repurpose the current accommodation, which is no longer fit for purpose, and increase usable floor area by approximately 28%, the proposal would provide the shops, homes, leisure and community facilities that the local area requires whilst also supporting strong, inclusive and sustainable economic renewal to enhance the vibrancy of Finchley Road as a town centre and local high street;
- A seamless connection between Finchley Road and West End Lane, that would enhance the vibrancy of the town centre and high street, whilst providing improved east west pedestrian and cycle routes;
- The removal of non-blue badge cars across the Site, which would contribute significantly to reducing local emissions associated with vehicle fossil fuel consumption and drive improvements to local public and active transport networks;
- Provision of green spaces and public realm that the area currently lacks;
- Substantially increasing the biodiversity by >165.4% and achieving a 0.39 UGF (for the Detailed Proposals);
- The proposed SuDs strategy would significantly improve current surface water run off rates and the capability of the Site and its surroundings to withstand future flooding events;
- The new development would support the creation of jobs and opportunities for local people;
- It enables the development of an area with its own identity and style but that also integrates into the local area; and

- Provides a safe and secure place open to all.

14.49 The increase in useable floorspace created by the Proposed Development is used to create a WLC intensity metric which is commonly used to compare the impact of different design strategies on buildings of varying sizes. In the context of this Site, it shows that Scenarios 1 and 2 have a significantly higher WLC intensity than either of the two new construction options, Scenarios 3a and 3b. This suggests that the deconstruction of the O2 Centre and new construction on the Site, as proposed for the scheme, would emit fewer emissions on a per sqm of useable floorspace basis than the building retention strategies shown in Scenarios 1 and 2.

14.50 In conclusion, direct comparison between the three scenarios is difficult. The assessments do not account for other benefits associated with the Proposed Development and wider implications of retaining the existing O2 Centre. The pure WLC assessment, shows that under a minimum retention target, Scenario 3a would marginally contribute the highest WLC emissions. This would improve on Scenario 1 if the stretch targets were met. Importantly, the study does not take account of the growing obsolescence of the existing building, due to its outdated and inefficient design, and works that would be required should it be retained in order to integrate it with the rest of the scheme and the local area. It also fails to account for the significant sustainability benefits associated with the deconstruction of the O2 Centre, which look beyond the carbon emissions from the structures themselves to include the wider implications on the local area and its residents, the full impact of which cannot be captured within a WLC assessment.

14.51 Overall, it is anticipated that the Proposed Development would achieve in the region of a 66.3% reduction for the Detailed Proposals and 53% reduction for the Outline Proposals in CO² emissions beyond the baseline³³, with the zero-carbon target shortfall to be offset through carbon offset payments. Significant sustainability benefits would be achieved through the redevelopment of the Site. Through retaining and reusing a significant proportion of the O2 Centre structure and materials and taking into consideration the sustainability benefits of the Proposed Development, the WLC

³³ Part L

Assessment shows that there would be no environmental argument as to why the O2 Centre should not form part of the comprehensive redevelopment of the Site.

- 14.52 On the basis of the above, it is considered that the Proposed Development would meet the local, regional and national planning policy requirements for energy and sustainability.

15 Transport, Servicing and Waste

15.1 This section of the Town Planning Statement assesses the acceptability of the proposed transport, access, servicing, refuse and trip generation of the Proposed Development in planning policy terms. It concludes that the transport principles accord with relevant adopted and emerging planning policies. A comprehensive approach has been taken to traffic, transport and highway related matters and further detail is provided within the relevant submission documents produced by Arup.

15.2 This section covers the following key items:

- a) Transport Strategy Overview and Trip Generation
- b) Vehicular Access and Highway Network
- c) Parking
 - i. Car parking
 - ii. Cycle parking
- d) Sustainable Transport Initiatives
 - i. Buses
 - ii. Rail
 - iii. Walking and Cycling
 - iv. Travel Plans
- e) Delivery, Waste and Servicing
- f) Construction

a) Transport Strategy Overview and Trip Generation

15.3 Chapter 9 of the NPPF sets out the Government's policies with regards to Transport. The overall aims are to promote solutions that support a reduction in greenhouse gas emissions and reduce congestion and would contribute to wider sustainability and health objectives. The NPPF outlines aims for a transport system balanced in favour of sustainable transport modes, in order to give people a real choice about how they travel. It also encourages solutions which support reductions in greenhouse gas emissions and reduce congestion. Paragraph 110 of the NPPF states it should be ensured that:

- appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- safe and suitable access to the site can be achieved for all users;
- the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
- any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

15.4 Paragraph 105 of the NPPF states that the planning system should actively manage patterns of growth in support of sustainable transport objectives.

15.5 Paragraph 111 of the NPPF is clear that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

15.6 At a regional level, one of the strategic objectives of the London Plan is to improve accessibility, making London an easier city to move around and making public transport and the pedestrian environment accessible to everyone. The Mayor's Transport Strategy sets out policies and proposals to achieve the goals set out in the Plan.

15.7 At a local level, Camden Local Plan Policy T1 prioritises walking, cycling and public transport in the borough. In pursuance of this Camden will seek to ensure developments improve the pedestrian environments by supporting improvements to the pedestrian environment. The delivery of improved walkways, wide pavements and safe and permeable developments is supported.

15.8 To assess the overall implications of developments LBC, under Policy T4, expects the submission of a Transport Assessment, Delivery and Servicing Management Plan and Construction Management Plan where the implications of proposals are significant.

15.9 Camden's Transport CPG provides information on the application of Camden's transport policies, including all types of detailed transport issues including assessing transport impact, travel plans, delivery and servicing plans and cycling facilities.

15.10 Policy 7 of the Fortune Green and West Hampstead NP outlines the approach to sustainable transport and encourages the safe movement of traffic on roads within the neighbourhood area and promotes a reduction in car use.

Assessment

15.11 A Transport Assessment (TA) has been prepared by Arup and is submitted in support of the Application. Arup have also produced a Framework Travel Plan (FTP), Delivery and Servicing Plan (DSP) and an Outline Construction Logistics Plan (CLP) which are all appended to the TA and submitted with the Application.

15.12 The vision is to create a vibrant, inclusive, mixed-use development with Healthy Streets principles embedded within the design. The Proposed Development would transform the Site into one focussed around people and place, with reduced car dominance and significantly enhanced provision for pedestrians and cyclists. The proposals would significantly improve connections through the Site for pedestrians and cyclists, enhance the public realm and footways on Finchley Road, as well as strengthening ties with the local community. Public spaces within the Site would be animated places that people enjoy, want to spend time and feel safe in.

15.13 The comprehensive redevelopment of the Site provides significant placemaking enhancement, encouraging healthy living in accordance with TfL's Healthy Streets approach. In particular:

- A new southern pedestrian and cycle east-west link would be created, which would improve the permeability of the Site and enhance connections with the surrounding area.
- Blackburn Road would be altered to become a low-speed, low-traffic environment on which active travel users would be prioritised. New landscaping would be provided as part of this to improve the street scene, drainage, and encourage pedestrian priority within the Site.

- A new linear park and three new public open spaces including two new squares, community green and a central square would be created within the Site. The buildings fronting onto Finchley Road would provide greater permeability through the creation of two additional street connections. The buildings would also be set back into the Site providing a wider footway on Finchley Road.

- 15.14 The central route through the Site helps to connect two communities – Finchley and West Hampstead – providing a safe and accessible route and areas to stop and dwell. Active frontages would be created within the Site to improve the look and feel as well as safety, through increased passive surveillance. All internal routes within the Site would incorporate the principles of ‘safe streets’. The routes would provide a pleasant street environment that prioritises pedestrian and cyclist movements, with enhanced hard and soft landscaping compared with the existing provision. The proposals would significantly improve the nature of the area, from a vehicle-oriented environment to a mixed-use attractive development which prioritises active travel users.
- 15.15 The car-free nature of the proposals, the enhanced cycle routes through the Site and significant improvements to planting / greenery within the Site also reflect LBC’s Climate Action Plan and goals to reach net zero by 2030.
- 15.16 With regards to travel demand associated with the Proposed Development, the trip forecast methodology has been agreed with TfL during the pre-application discussions.
- 15.17 Existing trip attraction has been calculated to be 848 trips in the AM peak hour (8-9am) and 2,239 trips in the PM peak hour (5.30-6.30pm).
- 15.18 Arup have estimated the trip generation for the Detailed Proposals which anticipate a total of 341 AM peak hour trips and 281 PM peak hour trips. This assumes the redevelopment of the Homebase store to provide for Phase 1 of the Proposed Development.
- 15.19 The Outline Proposals are anticipated to generate a total of 570 trips in the AM peak hour with 297 trips anticipated in the PM peak hour.

- 15.20 The external trip generation of the Outline Proposals has also been estimated as generating 526 AM peak hour trips and 34 PM peak hour trips.
- 15.21 The removal of the 520-space commercial car park and creation of a car-free development results in a large reduction in vehicle and vehicle passenger trips associated with the Site in accordance with planning policy. However, there would be increases in walking, cycling and public transport trips in the AM and PM peak hours as a result of the Proposed Development.
- 15.22 An assessment of public transport usage / capacities indicates that the Proposed Development would have a limited impact on services, including in terms of Station entries / exists. The Proposed Development would not exacerbate any existing issues with station assets.

b) Vehicular Access and Highway Network

- 15.23 London Plan Policy T1 requires development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 15.24 Policy T4 Part A of the London Plan sets out that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. Part F of Policy T4 states that development proposals should not increase road danger.
- 15.25 Camden Local Plan Policy T3 seeks improvements to transport infrastructure in the borough. The Council will not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects and will protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance.
- 15.26 The Transport CPG sets out that consent from the Highway Authority is required for any works affecting the public highway.

Assessment

- 15.27 Vehicular access to the Site would continue to be from the Blackburn Road / Finchley Road junction at the eastern end of the Site. Blackburn Road (east) provides vehicular access to Plots N1 to N7. A north-south route would be provided between Plots N2 and N3 enabling access to Plot S1 for disabled / servicing access. Buses would continue to run along Blackburn Road with a turning head provided at the western end. Access to Network Rail and TfL assets from the Site would continue to be available in their existing locations.
- 15.28 The reduced level of vehicular movements on-site creates the opportunity to change Blackburn Road into a low speed, low traffic environment which prioritises pedestrians and cyclists. The design of Blackburn Road provides carriageway space and a turning head for buses and delivery and servicing vehicles, whilst also incorporating landscaping features which extend out into the carriageway, with vehicles able to give way past them.
- 15.29 Access to the western end of the Site would continue to be via the West End Lane / Blackburn Road junction, providing access to Plots S8. The eastern end of this section of Blackburn Road adjacent to Granny Dripping Steps would be improved by way of a landscaped square which would provide a turning head and drop-off space, providing betterment in terms of access. The two sections of Blackburn Road would not be linked for vehicles.
- 15.30 It is proposed that pick-up / drop-off points would be incorporated within the Site, accommodating taxis and private vehicles. As these are likely to be largely used by customers of the retail and community focussed areas, they would be incorporated as part of the reserved matters applications of the relevant plots. It is currently envisaged that space could be provided on the north-south link road between Plots N2 and N3, and at locations on Blackburn Road in particular close to retail uses at the eastern end of the Site.
- 15.31 The scale of the existing Finchley Road / Blackburn Road junction has been reviewed in the context of the car-free masterplan proposals which would lead to a significant reduction in vehicle movements in and out of Blackburn Road compared with the

existing situation. Within the Outline Proposals, the junction could be revised as follows:

- The separate left turn lane from the northbound Finchley Road approach into the junction could be removed
- The eastbound lane on the Blackburn Road approach to Finchley Road could be removed
- The number of pedestrian stages to cross the Blackburn Road could be reduced from three to two, enabling a simpler pedestrian crossing arrangement

15.32 The revised layout would provide additional space for pedestrians and allow the continuation of footway widening on the western Finchley Road footway to continue to the Blackburn Road junction.

15.33 The reduction in the number of stages to cross the Blackburn Road arm of the junction also reflects the West End Lane to Finchley Road SPD request to consider the potential for improvements to the pedestrian connection and interchange between Finchley Road Underground and Finchley Road and Frognal Overground stations. The proposals would enable a more convenient pedestrian crossing arrangement and improvement for the pedestrian connection between the two stations.

15.34 It should be noted that the changes at the junction of Finchley Road and Blackburn Road are dependent on the development of the adjacent Plot (N1) which forms part of the Outline Proposals. As such, the approvals from TfL and implementation of the changes would be linked to a future reserved matters application for the associated plot.

c) Parking

i. Car Parking

15.35 Part A of London Plan Policy T6 states that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').

- 15.36 Table 10.3 of London Plan Policy T6.1 outlines the maximum residential car parking standards which should be applied to development proposals and used to set local standards with Development Plans. For those sites located in the Central Activities Zone, Inner London Opportunity Areas, Metropolitan and Major Town Centres, Inner London PTAL 4 and all areas of PTAL 5 and 6, the maximum car parking provision standard is to be car free.
- 15.37 Part E of London Plan Policy T6 states that appropriate disabled persons parking for Blue Badge holders should be provided as set out in the London Plan.
- 15.38 Policy T6.1 of the London Plan expects disabled parking to be provided for new residential developments. It states that residential development proposals delivering ten or more units must ensure that for three per cent of dwellings, at least one designated disabled persons parking bay per dwelling is available from the outset and demonstrate as part of the Parking Design and Management Plan, how an additional seven per cent of dwellings could be provided with one designated disabled persons parking space per dwelling in future upon request as soon as existing provision is insufficient. It is expected that this is secured at the planning stage.
- 15.39 Policy T6.1 of the London Plan also sets out that all residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.
- 15.40 London Plan Policy T6.2 and Table 10.4 outline the maximum parking standards which should be applied to new office development. For sites located within inner London, the maximum office parking standards is to be car free.
- 15.41 London Plan Policy T6.3 and Table 10.5 detail the maximum parking standards which should be applied to new retail development. For sites located within all areas of PTAL 5-6, the maximum retail parking standards is to be car free.
- 15.42 London Plan Policy T6.5 and Table 10.4 sets out the non-residential disabled persons parking which should be provided. These standards ensure that all non-residential

elements should provide access to at least one on or off-street disabled persons parking bay.

- 15.43 Camden Local Plan T2 clarifies that the Council will limit the availability of parking and require all new development in the borough to be car-free. The Council will:
- a) Not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits;
 - b) Limit on-site parking to:
 - i. Spaces designated for disabled people where necessary, and/or
 - ii. Essential operational or servicing needs.
 - c) Support the redevelopment of existing car parks for alternative uses; and
 - d) Resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking.

15.44 The Camden CPG states that for residential developments that demonstrate a requirement for parking spaces designated for disabled people, the quantity of parking will be as set out in the London Plan. In addition, for all major developments, the Council will expect that disabled car parking is accommodated on-site.

Assessment

- 15.45 There are currently 635 car parking spaces on the Site which would be redeveloped and removed as part of the Proposed Development to encourage more sustainable modes of transport.
- 15.46 The Proposed Development would be car-free, with the exception of one disabled 'blue badge' space per dwelling for 3% of dwellings, in accordance with London Plan and Local Plan policies. As agreed during pre-application discussions and owing to the creation of a new high quality public realm and excellent PTAL of the Site, further residential disabled parking provision would not be provided.
- 15.47 For the Detailed Proposals, 18 blue badge spaces would be provided within Plots N4 and N5. The accessible bays for Plot N3(E) are provided access to the parking within N4.

- 15.48 It is anticipated that up to 37 blue badge spaces would be required for the Outline Proposals. The location of these spaces would be confirmed as part of the future reserved matters applications.
- 15.49 In accordance with the London Plan, 20% of the blue badge spaces would have an Electric Vehicle Charging Point (EVCP) from the outset, with all remaining spaces (80%) having passive provision for future use.
- 15.50 The blue badge and EVCP car parking provision for the Detailed Proposals is set out in Table 15.1 below:

Plot	Blue Badge Spaces	EVCP Spaces
N3(E)	2	1
N4	7	1
N5	9	2
Total	18	4

Table 15.1: Detailed Proposals Blue Badge and EVCP Provision

- 15.51 The commercial uses are all proposed to be car-free excluding blue badge provision. Approximately 3 blue badge parking spaces would be provided for the commercial uses on-street on Blackburn Road. The majority of the commercial space falls within the Outline Proposals and accordingly the blue badge provision is associated with the Outline Proposals too. The number of spaces would be confirmed within the reserved matters applications.
- 15.52 Blue badge parking would be managed by a responsible management company. The uptake of blue badge parking would also be monitored so that if the uptake is less than the number of spaces provided consideration can be given to replacing spaces with alternative uses in discussion with LBC officers.

- 15.53 During the phased construction of the Site, there is expected to be periods when the O2 Centre, Sainsburys or the car showrooms would still be operating alongside the construction or operation of other phases. Accordingly, the commercial car parking under those scenarios is to be confirmed as part of detailed Construction Management Plans.
- 15.54 The opportunity to continue to operate the existing park-and-stride local school scheme which currently operates from the Site, utilising approximately 5-6 spaces per day, would be explored in interim phases during construction as part of the Construction Management Plan, while existing car parking associated with the O2 Centre remains available but would need to be phased out over time in accordance with car-free planning policies.
- 15.55 The car-free nature of the development would mean that residents and other users of the Site would most likely travel sustainably using the wide range of public transport services available near the Site, as well as by walking or cycling. This is appropriate given the high PTAL rating for the Site following development.

ii. Cycle Parking

- 15.56 Policy T5 and Table 10.2 of the London Plan sets out minimum cycle parking standards for new developments.
- 15.57 Policy T5 of the London Plan states that cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards.
- 15.58 Camden Local Plan Policy T1 sets out that the Council will promote sustainable transport by prioritising cycling in the borough and ensure a safe and accessible environment for cyclists.
- 15.59 Policy 8 of the Fortune Green and West Hampstead NP highlights that developments shall promote improved provision for cycling throughout the neighbourhood area and encourage cycling.

15.60 In addition, the Transport CPG states that the Council will seek high quality cycle parking facilities for development, including redevelopments and in applications that change travel patterns and the travel profile or increase the numbers of people travelling to a site. Applicants must provide, as a minimum, the quantity of cycle parking set out in the London Plan and applicants will provide cycling facilities that are fully inclusive and accessible by step free access.

Assessment

15.61 Long-stay and short-stay cycle parking would be provided in accordance with London Plan standards (set out in the TA) and the London Cycle Design Standards guidance.

15.62 The proposed cycle parking provision for the Detailed Proposals is set out in Table 15.2 below.

Plot	Land Use	Long Stay Provision	Short Stay Provision
N3(e)	Residential (C3)	110	19
	Retail (E.a)	3	
	Food and drink (E.b)		
N4	Residential (C3)	422	29
	Retail (E.a)	4	
	Office (E.c)		
	Community (F2)		
N5	Residential (C3)	516	52
	Retail (E.a)	9	

	Food and Drink (E.b)		
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Table 15.2: Detailed Proposals Cycle Parking Provision

- 15.63 Residential long-stay cycle parking would be via dedicated cycle stores located internally within each plot. A total of 5% of the residential long-stay cycle parking spaces would be in the form of Sheffield stands, which would help meet the needs of all cycle users by providing space for larger or adapted cycles.
- 15.64 The long-stay cycle parking for the commercial uses would be incorporated as part of internal fit out within each plot. This is appropriate given the low number of long-stay cycle parking spaces required for the proposed uses.
- 15.65 Short-stay cycle parking is in the form of Sheffield stands within the landscaping.
- 15.66 The remainder of the Site is coming forward in Outline. As such, the final development quantum per plot and resulting cycle parking requirements would be established through the submission of reserved matters applications. The indicative quantity of cycle parking spaces required for the rest of the development, based on the maximum development floorspace for each land use, are set out in Table 15.3 below. The residential unit numbers have been assumed based on the maximum floorspace proposed.

Land Use	Long Stay Provision	Short Stay Provision
Residential (C3)	2,046	31
Retail (E.a)	33	71
Food and Drink (E.b)	7	53
Financial and Professional Services (E.c)	4	27

Indoor Sport and Recreation (E.d)	3	13
Medical Services (E.e)	9	14
Non-residential Creche, Day Centre or Nursery (E.f)	7	
Office and Workspace (E.g)	12	2
Cinema (Sui Generis)	2	65
Drinking Establishment (Sui Generis)	6	48
Total	2,129	331

Table 15.3: Outline Proposals Indicative Cycle Parking Provision

d) Sustainable Transport Initiatives

- 15.67 Policy T1 of the London Plan sets out that development proposals should facilitate the delivery of the Mayor’s strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041.
- 15.68 Policy T1 goes on to state that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.
- 15.69 London Plan Policy T2 requires that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Its goes on to outline that proposals should:

- 1) Demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance;
 - 2) Reduce the dominance of vehicles on London's streets whether stationary or moving;
 - 3) Be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.
- 15.70 Policy T3 of the London Plan states that development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.
- 15.71 London Plan Policy T4 sets out that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.
- 15.72 When required, in accordance with national or local guidance, Policy T4 states that transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network at the local, network-wide and strategic level, are fully assessed. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.
- 15.73 Camden Local Plan Policy T1 outlines that in order to safeguard and promote the provision of public transport in the borough, the Council will seek to ensure that development contributes towards improvements to bus network infrastructure. Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments where appropriate.
- 15.74 Camden Local Plan Policy T1 sets out that where appropriate, development will also be required to provide for interchanging between different modes of transport including facilities to make interchange easy and convenient for all users and maintain passenger comfort.

15.75 Camden Local Plan Policy T1 seeks to promote walking in the borough and improve the pedestrian environment. The Council will ensure that developments:

- a. Improve the pedestrian environment by supporting high quality public realm improvement works;
- b. Make improvement works to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping;
- c. Are easy and safe to walk through ('permeable');
- d. Are adequately lit;
- e. Provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate; and
- f. Contribute towards bridges and water crossings where appropriate.

15.76 The Council promotes cycling in the borough and wishes to ensure a safe and accessible environment for cyclists. Camden Local Plan Policy T1 sets out that the Council will seek to ensure that development:

- a. Provides for and makes contributions towards connected, high quality, convenient and safe cycle routes, in line or exceeding London Cycle Design Standards, including the implementation of the Central London Grid, Quietways Network, Cycle Super Highways and;
- b. Provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan and design requirements outlined within the Council's CPG on transport. Higher levels of provision may also be required in areas well served by cycle route infrastructure, taking into account the size and location of the development;
- c. Makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers;
- d. Is easy and safe to cycle through ('permeable'); and
- e. Contribute towards bridges and water crossings suitable for cycle use where appropriate.

15.77 Policy T3 of the Camden Local Plan seeks to ensure improvements are made to transport infrastructure in the borough. The Council will not grant planning permission

for proposals which are contrary to the safeguarding of strategic infrastructure improvements projects and protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance.

- 15.78 The Transport CPG sets out a key message that all developments must have due regard to the safety, ease of movement and the quality of pedestrian and cycle facilities for people moving to and within a site.
- 15.79 In addition, the Transport CPG states that travel plans enable a development to proceed without adverse impact on the transport network through promoting a greater use of sustainable travel and thereby helping to tackle congestion and air pollution. The requirements of any travel plan will be tailored to the specific characteristics of the site and nature of the development.
- 15.80 Policy 5 of the Fortune Green and West Hampstead NP outlines that development shall make appropriate provision for, and/or contribute towards, improvements to the public transport infrastructure of the neighbourhood area.
- 15.81 NP Policy 6 sets out what public transport facilities in the neighbourhood area, the neighbourhood forum will support the improvement of.
- 15.82 Policy 7 of the NP states that in order to encourage the safe movement of traffic on roads in the neighbourhood area, and to promote a reduction in car use, development will be supported which includes the appropriate provision of:
- i. Car-free or car-capped developments
 - ii. Car club spaces
 - iii. Charging points and dedicated parking spaces for electric cars
 - iv. Contributions to safe road layouts, traffic calming, and the removal of rat-runs
 - v. Proposals which will result in a reduction in air pollution caused by vehicle emissions
 - vi. The appropriate provision of loading bays for commercial use that requires regular deliveries

15.83 Policy 8 of the NP promotes the improved position for cycling throughout the Area and encourages cycling. The policy sets out that this will be achieved, where appropriate, by:

- i. Contributions to the improvement of existing bicycle lanes and paths
- ii. Contributions to the provision of safe and well designated cycle routes, especially on the main roads through the neighbourhood area as well as on the Main Roads on the boundary of the neighbourhood area
- iii. Contributions to the provision of new bicycle lanes and paths
- iv. Contributions to the provision of new bicycle stands in all parts of the neighbourhood area and particularly in town and neighbourhood centres
- v. The provision of appropriate bicycle storage in residential and commercial development.

15.84 NP Policy 9 seeks to improve pedestrian access in the neighbourhood area by ensuring that developments take into account the following:

- Provide safe and wide pavements, giving the maximum possible space to pedestrians
- Is set well back from the pavement, where appropriate, with the aim of giving additional pavement space
- Improves accessibility for disabled people and those with push chairs
- Contributes to improved and safer pedestrian crossings
- Increases the amount of space for pedestrians around public transport facilities
- Improves the existing network of paths in the neighbourhood area
- Contributes to the provision of new paths and, where viable, new crossings over the railway lines.

Assessment – Buses

15.85 The Site currently has two bus stops with bus-stopping and bus-standing activity undertaken from the same shared location at the eastern most stop and the western

stop acting as a bus stop only. A turning head for buses would continue to be provided on Blackburn Road.

15.86 The existing bus routes that enter the Site are maintained within the scheme, with two bus stop locations, as well as bus standing facilities. The bus stops on Finchley Road are unaffected by the Proposed Development.

15.87 There are no dedicated driver facilities provided on-site in either the existing or proposed scenarios. However, the wide range of uses provided across the Site would act as driver facilities.

Assessment – Rail

15.88 The Site is immediately surrounded by London Underground, Overground and National Rail services.

15.89 The TA concludes that there is spare capacity on all of the lines serving the surrounding stations in both AM and PM peak hours from TfL's Railplan 2016 and 2031 models. All the ratios of demand to capacity for the AM and PM scenarios are below 70% which indicates that there are no line loading capacity issues. It should also be noted that TfL's Railplan model does not account for any changes in travel patterns such as increased home working, which would serve to reduce the peak hour demand.

15.90 Arup have also undertaken a review of West Hampstead and Finchley Road station assets, including entry/exit counts, staircase width requirements, gateline requirements and platform width requirements. Both stations operate within acceptable parameters based on TfL's assessment methodology although increases in entry / exit counts as a result of background growth forecast in TfL's Railplan model affects some station assets:

- Gate capacity at West Hampstead station meets demand in 2016 but is slightly exceeded in the AM peak in 2031
- The increased density of passengers on the southbound platform in the AM peak hour at Finchley Road in both 2016 and 2031, during the AM peak, means that the platform is not operating in line with TfL's guidance

15.91 However, it is noted that no improvement or upgrade schemes are currently identified for either West Hampstead or Finchley Road stations.

15.92 In accordance with the Finchley Road to West End Lane SPD ambitions, discussions have been held with TfL and other stakeholders regarding the feasibility of creating new links into Finchley Road and West Hampstead stations from the Site. Discussions around improved station access are ongoing and access improvements for both stations are subject to a more detailed review and assessment. Until this is concluded, it is proposed that land within the masterplan is safeguarded to ensure that the Proposed Development does not prejudice future accessibility improvements.

Assessment – Walking and Cycling

15.93 The proposed Site layout and removal of the existing commercial car park would increase the permeability of the Site and enhance the east-west connectivity for pedestrians and cyclists. A new east-west pedestrian / cyclist only landscaped street would be created through the southern part of the Site, linking the western part of Blackburn Road with Finchley Road. This would provide step-free access through the Site and improved permeability with Finchley Road to facilitate onward travel, as well as access to long-stay cycle parking within the lots and short-stay cycle parking within the public realm.

15.94 Footways would be provided along Blackburn Road which would enable east-west access through the Site. North-south routes would be created between plots, linking Blackburn Road with the southern pedestrian route. This would create a network of interconnecting streets maximising permeability and route-choice.

15.95 The primary cycle route through the Site would be along Blackburn Road, with on-carriageway cycling proposed for the majority of the route, with the exception of the eastern end of Blackburn Road where a marked cycle lane would be provided on the approach to the Finchley Road junction. On-carriageway cycling is considered appropriate in the context of the low-speed environment of the proposed Blackburn Road.

15.96 The pedestrian environment would be enhanced adjacent to the Site on Finchley Road, enabled by the repositioning of the existing building line creating additional

footway width. This would enable enhanced landscaping along this section of Finchley Road.

- 15.97 There are multiple pedestrian crossing opportunities adjacent to the Site on Finchley Road. Feasibility for further pedestrian connectivity improvements across Finchley Road has been explored but in the context of TfL's priorities this would not be possible. The pedestrian crossing on Finchley Road remains as a concept and could be pursued alongside future RMAs associated with the relevant phase (3b) at which time conditions on Finchley Road may have changed and a further collaborative conversation could take place.
- 15.98 Improvements to Billy Fury Way have been considered but due to the land adjacent to this route being outside of the Applicant's ownership the scope for improvements is limited.
- 15.99 The Proposed Development is forecast to generate up to 252 two-way cycling trips in the peak hours Site-wide. It is expected that the majority of these would use Blackburn Road as the most direct route available.

Assessment – Travel Plans

- 15.100 An FTP has been prepared by Arup and is submitted in support of the Application. The framework document covers the proposed residential and commercial land uses and forms the basis for future full Travel Plans, which would be prepared by the management of the residential development and occupiers of the commercial uses, where required, prior to occupation.
- 15.101 Future reserved matters applications would be submitted for the Outline Proposals. It is expected that these would be above the thresholds set by TfL / LBC which require Travel Plans to be submitted. The FTP therefore forms the basis of the future Travel Plans for these plots.

e) Delivery, Servicing and Waste

- 15.102 London Plan Policy SI 7 seeks to achieve resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal.
- 15.103 Policy SI 7 clarifies that referable applications should promote circular economy outcomes and aim to be net zero-waste. As such, a Circular Economy Statement should be submitted.
- 15.104 London Plan Policy T7 sets out that development proposals should facilitate sustainable freight movement by rail, waterways and road. Development proposals should facilitate safe, clean and efficient deliveries and servicing. The provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible.
- 15.105 As required in London Plan Policy T7, Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- 15.106 Camden Local Plan Policy CC5 seeks to make Camden a low waste borough. The Council will aim to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031.
- 15.107 Policy CC5 will also ensure that developments include facilities for the storage and collection of waste and recycling.
- 15.108 Camden Local Plan Policy T4 outlines that developments of over 2,500sqm are likely to generate significant movement of goods or materials by road (both during construction and operation) will be expected to minimise the impact of freight movement via road by prioritising use of the Transport for London Road Network or other major roads, accommodate goods vehicles on site and provide Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments where appropriate.

Assessment

15.109 Full details of the proposed arrangements, including measures to reduce the impact of the delivery and servicing activity, trip generation, loading bay capacity analysis, swept path analysis and targets, are contained in the DSP prepared by Arup and appended to the TA.

15.110 Access for service companies working on behalf of residents or third parties would take the following means:

- Online order supermarket delivery vehicles will park in a designated space alongside the buildings and operatives will contact the residents to arrange delivery to their front door.
- Post and package deliveries – access to the post rooms of the respective blocks to which the residents will have access control, will be provided to the delivery companies upon agreement with the FM team. Each apartment will have its own post box for small items, with bulkier objects deposited in shared lockers. Access to these, via a pre-determined code, will be at the resident's convenience.
- Hot food delivery service – drivers will contact residents upon arrival who will then meet the driver at reception or an agreed location.
- Move-in and move-out service – each car park has a designed space for a small removal van for residents to load or unload. The use of a designated parking space could be managed by allocating time slots during busy periods. Residents' possessions can be carried to or from the core leading to their apartments, using the lift for heavy items. Residents of N3C will be able to park for a limited time close to the entrance in order to load / unload possessions.

15.111 Plot N4 would have a kerbside delivery point adjacent to the building entrance and would have parcel lockers within the entry lobby. Use of the parcel lockers would help to reduce the number of repeat visits required if deliveries are missed.

15.112 Kerbside loading for the Detailed Proposals is considered suitable given the quantity of development (608 residential units). Vehicles, including buses, would give way around these positions. This arrangement is considered acceptable considering the quantity of development and the forecast traffic flow of Blackburn Road being low.

- 15.113 The peak number of delivery and servicing vehicles forecast for the Detailed Proposals is 7 in total in the peak servicing hour (11:00 – 12:00), which with a dwell time of approximately 10 to 20 minutes can be accommodated by the loading locations provided.
- 15.114 The short-stay cycle parking for the detailed plots is located within the public realm in the form of Sheffield stands. This provision would provide for cargo bikes too and its availability service to support alternatives to vehicle use by delivery companies.
- 15.115 For the Outline Proposals, the servicing strategy would be established through reserved matters application and would be dependent on the final development schedule.
- 15.116 The Outline Proposals involve the provision of a servicing yard for Plots N1, N2 and S1, which would accommodate commercial deliveries and residential deliveries. An element of on-street (kerbside) loading would be also used for Plots N1, N2, S1 and N7 via the north-south and east-west sections of internal street between Blackburn Road and the service yard. On-street (kerbside) loading is also proposed for deliveries to Plots S8 (at the western part of the Site). In the same manner as the Detailed Proposals, consolidation of delivery locations and use of features such as parcel lockers would also be considered when developing the proposals for each plot.
- 15.117 The design of the streets adjacent to these Plots would also be subject to future reserved matters applications. It is expected that the strategy for on-street provision including vehicles giving way around them would continue from the detailed element. Provision for deliveries via cargo bikes would also be accommodated within the landscaping associated with each plot.
- 15.118 Refuse collection for the Detailed Proposals would take place from dedicated refuse stores via the kerbside loading locations on Blackburn Road. This is appropriate given the short dwell times of waste collection vehicles. The on-site facilities management team would ensure bins are moved to the waste stores for collection at appropriate times. Sufficient waste storage has been provided and a separate Waste Management Plan prepared by Arup has been submitted with the Application.

f) Construction

15.119 London Plan Policy T7 states that Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

15.120 Policy T7 Part K sets out that during the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.

15.121 Camden Local Plan Policy T4 outlines that developments of over 2,500sqm are likely to generate significant movement of goods or materials by road (both during construction and operation) will be expected to minimise the impact of freight movement via road by prioritising use of the Transport for London Road Network or other major roads, accommodate goods vehicles on site and provide Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments where appropriate.

Assessment

15.122 An Outline CLP, appended to the TA, has been prepared by Arup and is submitted with the Application. This provides further detail on construction phasing, site access and egress, and pedestrian and cycle routing during the construction of the Site. It estimates vehicle movements and also considers strategies to reduce the impact of construction vehicles and deliveries, measures to encourage sustainable freight, material procurement measures and other measures. Please refer to the Outline CLP for more information. It is expected that a detailed CLP would be required prior to commencement, secured by condition.

Summary

15.123 The Site is located in an area of high public transport accessibility. Five stations offering a range of London Underground / Overground and National Rail services are

located in proximity. Furthermore, 9 bus services are located within 640m of the Site, offering a combined frequency of 131 buses per hour at peak times.

15.124 The Site is situated close to a comprehensive network of walking and cycling routes. The location of the Site means that multiple destinations a wide range of destinations are accessible within a 30-minute cycle. This would help to encourage cycling as an attractive mode of transport for residents and other users of the development.

15.125 The development would result in a significant reduction in vehicular activity, which is strongly supported by planning policy at all levels.

15.126 In terms of impact on the public transport network and surrounding stations:

- There would be a negligible result on the capacity of surrounding London Underground, Overground, and National Rail lines. All lines currently operate with capacity and would continue to in the 2031 scenario and would experience minimal increases in trips associated with the development.
- The Proposed Development would result in minimal additional trips and minimal proportional increase in entries / exits at local stations. The most significant increase in trips would be at Finchley Road in the AM peak hour of just over 4%.
- Station assets would continue to operate similarly to the existing or to their forecast operation in 2031.
- Challenges have been identified with the platform width at Finchley Road Station. This is an existing constraint, which the Proposed Development would not materially exacerbate.
- It has been identified that once future background growth forecast by TfL is accounted for, ticket gates at West Hampstead Underground Station would operate at capacity. However, the Proposed Development has a negligible impact on entries / exits to the station.
- Overall, the Proposed Development would not exacerbate any of the existing issues. Future changes in travel patterns, and a potential flattening of peak demand, may improve these situations in future.

15.127 In terms of impact on the highway network and active travel networks:

- The Proposed Development would result in a significant reduction in vehicle trips on the highway network.

- Changes are proposed for the Blackburn Road / Finchley Road junction. The changes would have a minimal impact on the operation of the junction. The bus lanes within the junction currently and would continue to operate with a minimal degree of saturation, delays and level of queuing. The alterations are for the benefit of pedestrian movement and public realm as a response to the changing nature of the Site which is to be pedestrian and cycle oriented, rather than a vehicle-dominated environment.
- The Proposed Development would result in a significant increase in walking and cycling trips. Measures would be in place to accommodate this, for example improved routes through the Site and a large quantity of cycle parking.

15.128 The Proposed Development includes a range of measures and interventions which would enhance connectivity, promote use of public transport, walking and cycling and ensure that the proposals are appropriately integrated into wider transport networks. These measures include:

- Significant improvements to accessibility, permeability and the quality of the environment for pedestrians and cyclists by creating a range of routes within the Site for people of all abilities and ensuring good connections with the surrounding pedestrian and cycling network.
- A policy compliant level of public and private cycle parking within the Site.
- A car-free development for all land uses (except for blue badge parking). This results in a significant reduction in vehicular movements within the Site, changing the nature of the Site from a vehicle-dominated environment to a development focussed around people and place.
- The principle of safeguarding land within the Site for the provision of a new access into Finchley Road Underground Station.
- The principle of contributing towards improvements to West Hampstead Underground Station.

15.129 Overall, it can be concluded that the Proposed Development is a sustainable scheme which supports the Healthy Streets Approach, Mayor's Transport Strategy, and London Plan. Furthermore, it would not have significant adverse impacts on the capacities or the safe operation of the surrounding transport networks.

15.130 The Proposed Development is compliant with current national, regional and local planning policy and transport policy and guidance.

16 Other Technical Considerations

16.1 The section of the Town Planning Statement sets out the policy associated with other technical considerations and provides an assessment for each. The following topics are covered in this chapter:

- Basements
- Archaeology and built heritage
- Noise and vibration
- Flooding, drainage and SUDs
- Fire
- Ground conditions and land contamination
- Ecology and Biodiversity
- Wind microclimate
- Air quality
- Daylight, sunlight, overshadowing and solar glare
- Services and utilities

Basements

16.2 Camden Local Plan Policy A5 states that the Council will only permit basement development where it is demonstrated to its satisfaction that the proposal would not cause harm to:

- a) neighbouring properties;
 - b) the structural, ground, or water conditions of the area;
 - c) the character and amenity of the area;
 - d) the architectural character of the building; and
- the significance of heritage assets.

16.3 Camden Basements CPG gives detailed guidance with respect to new basement development, specifically their siting, location, scale and design.

16.4 The CPG advises that the Council strongly encourages applicants to use the Council's Basement Impact Assessment ('BIA') proforma to ensure that all aspects of potential impact are addressed, a BIA of which is included as part of this application

Assessment

- 16.5 A Basement Impact Assessment ('BIA'), prepared by Pell Frischmann, has been prepared and is submitted in support of this Application. It gives an overview of the substructure and the basement considerations in the context of the Proposed Development, considering whether the proposed basement works planned as part of the development would have a detrimental impact on the Site surroundings with respect of groundwater, local and regional hydrogeology, land stability and whether the basement development would affect the stability or integrity of adjacent infrastructure.
- 16.6 The BIA was undertaken using best practice methodology and in accordance with CPG Basements (2021). An initial screening and scoping were carried out to identify potential areas that may be impacted by the proposed basements forming part of the redevelopment of the Site, and these areas were then investigated to present an assessment of the impact of the works.
- 16.7 The basement proposals for the Outline Plots are presented within the Proposed Basement Extents parameter plan. This shows a maximum allowance that could be considered when the design of these plots comes forward at the reserved matters stage.
- 16.8 Both the new small basements proposed for Blocks N4 and N5, within the Detailed Proposals, and the existing basement of the O2 Centre, would not result in any specific issues relating to land or slop instability, detrimental effect on the local hydrogeology and hydrology of the Site, nor to have any adverse impact on neighbouring infrastructure. Building damage resulting from ground movements are qualitatively assessment as Category 0 (negligible). The Pell Frischmann report recommends that monitoring points are installed on the existing basement wall and/or levelling points at the O2 Centre on the adjacent roadways to verify the anticipated negligible impact of the works on adjacent infrastructure. Similarly, for the construction of Block N5 over the existing Thames Water sewer, a ground movement monitoring regime would be in place as part of the build-over agreement.

16.9 Accounting for the relevant recommendations, it is considered that the basement proposals accord with Camden Local Plan Policy A5.

Archaeology and Built Heritage

16.10 Paragraph 195 of the NPPF requires LPAs to identify and assess the significance of any heritage assets that may be affected by development. Paragraph 205 states that LPAs should require developers to record any advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.

16.11 London Plan Policy HC1 Heritage conservation and grown, part D states that development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.

16.12 Camden Local Plan Policy D2 states that the Council will protect remains of archaeological importance by ensuring acceptable measures are taken proportionate to the significance of the heritage asset to preserve them and their setting, including physical preservation, where appropriate.

Assessment

16.13 An archaeological desk-based assessment has been prepared by Mola and submitted with this Application and details that the Site does not lie with an Archaeological Priority Area (APA).

16.14 An archaeology assessment has been undertaken which examines the potential impact and likely effects of the Proposed Development on buried heritage assets (archaeological remains) within the Site. The assessment considers the magnitude of change (impact) of the Proposed Development upon the significance of known or potential buried heritage assets and the resulting environmental effects.

16.15 Due to the mid/late 20th century development of the Site and the shallow depth of the underlying London Clay, archaeological survival is expected to be very limited and localised. Buried heritage assets that may be affected by the Proposed Development comprise:

- Fragmented archaeological remains of late 19th century development of low significance; and
- The bases of agricultural features such as field boundaries of low significance.

16.16 In view of the very low potential of the Site for remains pre-dating the early 20th century, it is considered further archaeological investigation is not necessary.

Noise and Vibration

16.17 The NPPF contains guidance on noise management in planning decisions. Paragraph 170 of the NPPF requires planning decisions to contribute and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of, among other things, noise.

16.18 Paragraph 185 states that decisions should aim to avoid noise giving rise to significant impacts on quality of life as a result of development and mitigate noise impacts. This paragraph contains recognition that development will 'often create some noise'.

16.19 Paragraph 187 of the NPPF states that:

“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”

16.20 Policy D12 Agent of Change of the London Plan places the responsibility for mitigating impacts from existing noise on the proposed new noise-sensitive development. New noise and nuisance-generating development proposed to noise sensitive uses should put measures in place to mitigate and manage any noise impacts. This can be achieved through:

1. Ensuring good design, mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area.
2. Exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations.
3. Separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.

16.21 London Plan Policy D14 states that development proposals should manage noise by:

- avoiding significant adverse noise impacts on health and life;
- reflecting Agent of Change principle;
- mitigating and minimising the existing and potential adverse impacts of noise without placing unreasonable restrictions on existing noise-generating uses;
- improving and enhancing the acoustic environment and promoting appropriate soundscapes;
- promoting new technologies and improved practices to reduce noise at source.

16.22 At a local level, Policy A1 of the Local Plan seeks to manage the impact of development. The policy states that the Council will:

- a) seek to ensure that the amenity of communities, occupiers and neighbours is protected
- b) seek to ensure development contributes towards strong and successful communities by balancing the needs of development with the needs and characteristics of local areas and communities

- c) resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network; and
- d) require mitigation measures where necessary.

16.23 Camden Local Plan Policy A4 seeks to ensure that noise and vibration from development is controlled and managed. Planning permission will only be granted for noise generating development where it can be operated without causing harm to amenity. Camden also seeks to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development through this policy.

16.24 The Amenity CPG prepared by Camden supports Local Plan Policy A4, setting out that the Council will assess the impact of noise and vibration through the consideration of acoustic reports submitted by applicants. The Council expects noise mitigation (where appropriate) to be incorporated into developments at the design stage and the Council will seek to secure these through planning condition or legal agreement.

Assessment

16.25 Noise and vibration is assessed within Chapter 6 of the Environmental Statement (ES) prepared by Plowman Craven.

16.26 In respect of construction works noise, it is likely that high or medium magnitudes of change would be experienced from construction works noise at nearby receptors for approximately 3 months in total. In order to mitigate this effect, a CLP would be agreed with the LBC in advance of construction works taking place, secured by condition. Standard measures to manage construction noise would be contained within a CMP also intended to be secured by condition. These mitigation measures would provide reductions in noise levels and considerably reduce the durations for which receptors are subject to elevated noise levels and would protect against lasting health effects. Nevertheless, due to short separation distances, short-term high and medium magnitudes of change are still expected. Any high or medium magnitudes of change would only prevail for 1-2 working days at any time, before separation distances are increased. Consequently, it is unlikely that high or medium magnitudes of change would be experienced from construction works noise at any receptor for more than

two weeks in total. In the worst instances, construction noise would create a temporary, short-term, major negative effect that is significant.

- 16.27 In respect of construction works vibration, construction works would take place close to sensitive receptors. Standard measures to manage vibration would be contained within a CMP, secured by planning condition. Post mitigation, moderate magnitudes of change from construction vibration would be experienced at West Hampstead student accommodation, Clockwork Factory apartments and for occupants of the Proposed Development. Minor or negligible magnitudes of change would be expected at all other receptors. Implementation of the mitigation measures specified would limit elevated vibration levels to only prevail for short periods of time (less than one working day). Therefore, it is unlikely that construction vibration would result in any long-term negative health effects.
- 16.28 In respect of construction works traffic noise, construction traffic serving the Proposed Development would either be unchanged or reduced. The only exception to this is on Blackburn Road, for which greater reductions in traffic noise are expected. Nevertheless, as the general sound climate at receptors close to Blackburn Road is also defined by railway noise the change in the general sound climate is expected to be negligible in practice. No mitigation is required for construction traffic noise albeit that it would be managed by a CLP secured by condition. Construction traffic noise is a negligible effect that is not significant.
- 16.29 In respect of operational traffic noise, this would either be unchanged or reduced as a result of operation of the Proposed Development. The only exception to this is on Blackburn Road, for which greater reductions in traffic noise are expected. Nevertheless, as with construction traffic, as the general sound climate at receptors close to Blackburn Road is also defined by railway noise the change in the general sound climate is expected to be negligible in practice. No mitigation is warranted for operational traffic noise and residual operational traffic noise is considered to have a permanent, long-term negligible effect that is not significant.
- 16.30 In respect of building services plant noise, the ASHPs and generators have the potential to result in a high magnitude of change for occupants of the Proposed Development. As the design of the Proposed Development is progressed it would be ensured that the ASHPs comply with the relevant plant noise limits. To achieve these

limits, acoustic packs would be required for all ASHPs. The proposed noise limits for emergency plant (such as emergency generators) are subject to a 10 dB relaxation on the basis that emergency plant would only operate for short periods of time during routine testing (usually fortnightly) and in emergencies. Accordingly, residual building services plant noise is anticipated to be a permanent, long-term, minor negative effect that is significant.

- 16.31 In respect of internal noise, to achieve suitable internal noise levels, allowance has been made for acoustically enhanced glazing and facades. These are laboratory performance requirements, derived on the basis of achieving onsite criteria, allowing for the likely differences provided in situ. Some facades may be subject to relaxed performance requirements as the design proposals are finalised. An appropriate strategy for managing ventilation and overheating has been derived on the basis of windows being closed, using MVHR, so that occupants are not forced to choose between elevated noise levels or overheating, albeit that windows would still be openable for purge ventilation as defined in the Building Regulations. Accordingly, the internal noise levels correspond to a permanent, long-term, minor negative effect that is not significant.
- 16.32 In respect of external noise in amenity areas, the predicted noise levels of these areas correspond to a high magnitude of change, given that the Site is surrounded by sources of transport noise. Accordingly, embedded mitigation has been provided through thoughtful layout design to provide an external area that is suitable for dwelling in terms of noise levels from traffic sources. Noise levels across the allocated 'quiet area' within the Site correspond to a medium or low magnitude of change. As external areas are classed as having a medium sensitivity to noise this corresponds to a minor adverse effect, given the context of the surrounding area. Residual external noise levels across the Site correspond to a permanent, long-term, minor negative effect that is not significant.
- 16.33 In respect of vibration, tactile vibration to occupants is not expected to be a risk going forward and no mitigation is required. Accordingly, vibration levels across the Site correspond to a permanent, long-term, negligible effect that is not significant.

16.34 For cumulative effects, cross refer with Chapter 6 of the ES prepared by Plowman Craven and submitted in support of the Application.

Flooding, Drainage and SUDs

16.35 The NPPF identifies that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.

16.36 At a national level, paragraph 169 of the NPPF specifies that major developments should incorporate sustainable drainage systems, unless there is clear evidence that this would not be appropriate.

16.37 At a local level, Camden Local Plan Policy CC2 advises that all development should adopt appropriate climate change adaption measures, including not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems.

16.38 Camden Local Plan Policy CC3 seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible.

16.39 The Water and Flooding CPG (2019) states that the Council expects all developments, whether new or existing buildings, to be designed to be water efficient by minimising water use and maximising the re-use of water.

Assessment

16.40 The Site is located within Flood Zone 1 and is therefore at low risk of flooding from fluvial and tidal sources. The area has a low susceptibility to groundwater emergence and the risk of flooding remains relatively low.

16.41 The risk of flooding from surface water mapping shows areas of moderate to high risk across the Site, resulting from runoff generate by the Site only. As part of the proposals, sustainable management of surface water would seek to manage and mitigate this risk.

- 16.42 As set out within the Flood Risk Assessment (FRA), prepared by Pell Frischmann, in accordance with the NPPF and relevant local plan policies, the Proposed Development could proceed without being subject to significant flood risk. Furthermore, the Proposed Development would not result in increased flood risk to third parties if there is suitable management of surface water runoff.
- 16.43 Policy states that all new developments should try and reduce water discharge to greenfield runoff rates where it is possible to do so. The Applicant team have looked at reducing run-off rates as far as possible and it is proposed that a 50% reduction in the existing proven discharge rates can be provided.
- 16.44 The Proposed Development are therefore consistent with the objectives of the NPPF, London Plan Policy SI13 and LBC Policy CC3 demonstrating the Site is not at increased risk of flooding, provides future resilience to the effects of climate change and demonstrates a sustainable approach consistent with current best practice. Overall, the proposed development offers a significant betterment to the existing site drainage.

Fire Safety

- 16.45 Policy D12 of the London Plan requires that developments proposals must achieve the highest standards of fire safety. Part B of Policy D12, states that all major development proposals should be submitted with a Fire Statement produced by a third party suitable qualified assessor.
- 16.46 Part B (5) of the London Plan Policy D5 requires that for all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

Assessment

- 16.47 A Fire Safety Statement has been prepared by Hoare Lea and is submitted in support of this Application. The Statement demonstrates that the Proposed Development has

considered fire safety at the earliest stage and the further development of the design strategy would be based upon the principles set out in the Fire Safety Statement.

- 16.48 The fire strategy would be further developed for submission to LBC at the appropriate time, meeting the functional requirements of Building Regulations 2010 as amended, and in accordance with the requirements of London Plan policies.

Ground Conditions and Land Contamination

- 16.49 Policy A1 of the Camden Local Plan stipulates that the Council will seek to protect the quality of life of occupiers and neighbours. The factors the Council will consider include [inter alia] contaminated land.

Assessment

- 16.50 Ground conditions and land contamination are covered by ES chapter 10. The main effects relating to potential soil contamination result from the disruption to potential existing ground contamination during construction works and abnormal ground conditions associated with poor natural ground conditions.
- 16.51 Ground investigation works were undertaken in September 2021 and supplementary ground investigation may be required post demolition of the current Site buildings and structures on Site, following discussions with regulators. Dependent on the findings of the ground investigation, additional ground gas monitoring, as well as the development of a remediation strategy may be required as part of the detailed design of the Proposed Development.
- 16.52 Mitigation measures should be implemented in order to minimise or remove risks associated with this. Mitigation measures are likely to include PPE for construction and maintenance workers, a watching brief during ground investigation, ground gas monitoring, and appropriately designed construction methods, buildings and foundations to accommodate any ground risks.
- 16.53 If all mitigation measures are implemented, then it is anticipated that overall, there is likely to be a negligible effect on all receptors.

Ecology and Biodiversity

- 16.54 London Plan Policy G6 sets out the expectation that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. It is stated that this should be informed by the best available ecological information and addressed from the start of the development process.
- 16.55 Policy A3 of the Camden Local Plan outlines that the Council will protect and enhance sites of nature conservation and biodiversity. The Council will grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species.
- 16.56 Additionally, Local Plan Policy A3 states the Council will assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed.
- 16.57 Camden published a Biodiversity CPG in March 2018 which sets out that development proposals must demonstrate how biodiversity considerations have been incorporated into the development, how the five point mitigation hierarchy has been addressed and what positive measures for enhancing biodiversity are planned.

Assessment

- 16.58 Chapter 14 of the ES prepared by Plowman Craven and submitted in support of the Application assesses ecological effects of the Proposed Development.
- 16.59 West Hampstead Railside, Medley Orchard and Westbere Copse (Borough Grade I Importance) is located immediately to the north of the Site, and Frogna Court Wood SINC approximately 50m to the north of the eastern section of the Site (Borough Grade II Importance).

- 16.60 The Site is currently dominated by hardstanding car park and buildings. Other habitats recorded within the Site included scattered landscape tree planting, introduced shrub, species poor hedgerow, hardstanding and buildings.
- 16.61 No nesting birds were identified during the walkover survey. However, it should be noted that the trees within the Site were generally young, and hedges subject to disturbance from cars. There was potential for bird species such as gulls and pigeons to be roosting on the roof of the buildings. No suitable reptile habitat was present within the Site. However, the Site boundaries offer connectivity for the species along the railway lines.
- 16.62 The Site was considered to be of negligible value for foraging or commuting bats, although bat species may use the rail corridors to the north and south of the Site occasionally. The buildings were assessed as negligible value for roosting bats. Most trees within the Site were identified as having no suitable bat roosting features, however, the London plane trees along Billy Fury Way were assessed as having low potential for roosting bats.
- 16.63 The Site was identified as having a negligible potential for other protected or notable species and no scheduled invasive species were identified during the walkover survey.
- 16.64 As part of the Proposed Development, the mature London Plan trees along Billy Fury Way are to be retained, as well as a small number of trees scattered through the Site. A significant number of habitats are to be created by the Proposed Development which include habitats and species to suit landscape amenity and also bird and pollinating species. This would provide the Site with resilience and enable pollinator and bird species to continue to thrive within the wider urban environment.
- 16.65 The Landscape Strategy produced by East was used by Pell Frischmann to assess the post-development biodiversity units and to determine whether or not the Proposed Development would be able to achieve Biodiversity Net Gain (BNG) upon completion. Based on this design, Pell Frischmann have concluded that the Proposed Development is likely to result in a net gain in habitat units within the red line boundary of the Application. The BNG calculations indicate that the Proposed Development would result in the net gain of 1.65 habitat units when compared to the current

baseline conditions at the Site. Due to the urban setting of the Proposed Development and the very small number of units identified at the baseline, this translates to a significant 165.43% gain in biodiversity within the Site.

- 16.66 Accordingly, the ecological proposals and biodiversity gain of the Proposed Development is considered to accord with the relevant planning policies.

Wind Microclimate

- 16.67 Policy D8 of the London Plan sets out that development proposals should ensure buildings are of a design that activates and defines the public realm and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings.

- 16.68 Local Plan policy A1 in relation to 'managing the impact of development,' Policy A1 Managing the impact of development states that the Council will seek to protect the quality of life of occupiers and neighbours. As listed, microclimate is listed as a consideration taken into account in assessing the impacts from the development on amenity.

- 16.69 The Amenity CPG seeks new developments to consider the local wind environment, local temperature, overshading and glare, both on and off the site.

Assessment

- 16.70 A Wind Microclimate Assessment was undertaken for the Proposed Development using Computational Fluid Dynamic (CFD) modelling of the existing Site and the Proposed Development.

- 16.71 There are no significant effects identified in the assessment of the Detailed Proposals design.

- 16.72 There are no residual significant effects identified in the assessment related to safety issues. However, there is additional mitigation required in several terrace areas of the

Outline Proposals. For these areas, the design will be reviewed at the RM stage, which will seek to provide further mitigation relating to these effects.

- 16.73 There are no residential significant effects identified in the assessment related to comfort issues. However, there is additional mitigation required in several terrace areas of the Outline Proposals. For these areas, the design will be reviewed at the RM stage, which will seek to provide further mitigation relating to these effects.
- 16.74 The assessment of the Detailed Cumulative scenario does not differ much from the proposed scenario and there are therefore no significant cumulative effects.
- 16.75 Mitigation measures for the wider development have not yet been fully developed (as they form part of the Outline Proposals) and so not all residual conditions have been directly assessed.
- 16.76 The technical details not brought forward yet, that will be developed as the design of the Proposed Development progresses, will need to be assessed for wind microclimate suitability.
- 16.77 With the suggested mitigation in place and the design of the Outline Proposals reviewed at the RM stage, it is expected that all areas in and around the Proposed Development at both ground and elevated levels will be suitable for their intended use.

Air Quality

- 16.78 At a national level, NPPF paragraph 185 advises that planning decisions should ensure that development is located appropriately. Development proposals should consider the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from development. In pursuance of this development proposals should mitigate and reduce to minimum potential adverse impacts in amenity.

- 16.79 The NPPF states that development should not contribute to or be put at unacceptable risk of, or be adversely affected by unacceptable levels of pollution, including air pollution (paragraph 174).
- 16.80 London Plan Policy SI 2 Minimising greenhouse gas emissions requires major developments are net zero-carbon, through reducing greenhouse gas emissions during operation through being lean, clean and green. Major proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met.
- 16.81 London Plan Policy SI 1 states that masterplans and development briefs for large-scale development proposals subject to an EIA should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating how the proposals have considered ways to maximise benefits to local air quality and what measures of design features will be put in place to reduce exposure to pollution and how they will achieve this.
- 16.82 The GLA Housing SPG Standard 33 requires development to minimise increased exposure to existing poor air quality and make provision to address local problems of air quality: be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).
- 16.83 At a local level, Local Plan Policy CC4 requires development to provide air quality assessments where the proposed scheme is likely to expose residents to high levels of air pollution.
- 16.84 The Air Quality CPG was published by LB Camden in January 2021 and states that Camden is a designated Air Quality Management Area due to the high concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀). As such, all developments are to limit their impact on local air quality. An Air Quality Assessment is required to support any scheme which proposes uses susceptible to poor air quality, such as housing.
- 16.85 The Air Quality CPG prepared by LB Camden outlines that the Council's overarching aim is for new development to be 'air quality neutral', not lead to further deterioration

of existing poor air quality and, where possible, to improve local air quality ('air quality positive'). The demolition and construction phases of development on air quality must be taken into account as part of planning applications. Mitigation and offsetting measures to deal with any negative air quality impacts associated with development must be implemented.

Assessment

- 16.86 As part of Chapter 7 of the ES prepared by Plowman Craven, an assessment has been undertaken of the likely significant air quality effects arising from the Proposed Development at existing nearby sensitive receptors during the construction and operational phases of the Proposed Development.
- 16.87 Dust and particulate matter emissions released during the construction phase of the Proposed Development would be controlled through the implementation of a Construction Environmental Management Plan (CEMP). These emissions are therefore not expected to give rise to significant effects.
- 16.88 The energy strategy for the Proposed Development is all-electric, utilising zero-emission technologies. As no combustion sources are proposed, the impacts of emissions from the energy plant should not give rise to significant effects. The removal of the existing car parking space on the Site and the creation of a Development that is founded upon sustainable modes of transport and a high quality east to west link will have a positive effect on local air quality.
- 16.89 A detailed assessment of air quality in the operational phase of the Proposed Development has been screened out as traffic generated by the Proposed Development is less than that of the existing Site uses, as such impacts from road traffic generated by the Proposed Development would not give rise to significant effects.
- 16.90 A site suitability assessment determined that predicted NO₂ and PM₁₀ concentrations across the Site in the construction phase would not exceed the relevant AQOs and WHO guidelines. However, there are expected to be exceedances of the PM_{2.5} WHO guidelines at all future receptors. As such, mitigation is required in the form of

mechanical ventilation with ISO Epm_{2.5} filtration of over 50% at all air intakes for the Proposed Development.

- 16.91 The site suitability assessment determined that predicted concentrations across the Site would fall below the relevant AQO for the three pollutants assessed. However, there are expected to be exceedances of PM_{2.5} concentrations at all receptors on all floors of the Proposed Development and therefore, suitable mitigation is required to reduce PM_{2.5} concentrations. Mitigation is required in the form of mechanical ventilation with ISO Epm_{2.5} filtration of over 50% at all air intakes for the Proposed Development. This is to reduce PM_{2.5} concentrations to below the WHO guideline.
- 16.92 The impacts of the Proposed Development have been considered alongside other consented schemes in the local area and the cumulative effects are not expected to be significant.
- 16.93 London Plan Policy S1 entitled ‘improving air quality’ sets out that masterplan for large scale development proposals subject to an Environmental Impact Assessment should consider how air quality can be improved across the area of the proposals as part of an air quality positive approach. This Application is supported by an Air Quality Positive Statement by Hoare Lea which demonstrates how the proposals have considered ways to maximise benefits to the local air quality and what measures of design features will be put in place to reduce exposure to pollution, and how they will achieve this.
- 16.94 In accordance with Policy SI 1 of the London Plan, requiring an air quality positive approach for major masterplans, air quality has been considered in the design process (and is referenced within the DAS) as follows:
- i. A landscape led masterplan that introduces a significant planting strategy that will improve air quality;
 - ii. Removing of car parking and the provision of a car free development;
 - iii. The layout of buildings within the Application Site has been considered to encourage the dispersion of pollutants within the Application Site by promoting air flow between buildings;

- iv. The energy strategy does not include combustion-based heat and is proposed to be all-electric. Therefore, the impacts of energy provision on local air quality will be negligible; and
- v. Adopting the Healthy Streets Approach and has considered both the location and function of highway space at an early stage, prioritising strategies that enhance access and connectivity for sustainable modes of transport.

16.95 Chapter 3 of the Air Quality Positive Statement provides a table of all the measures adopted as part of the Air Quality Positive Approach.

16.96 Overall, the air quality effects of the Proposed Development are judged to be not significant with suitable mitigation. Accordingly, the Proposed Development therefore complies with the relevant planning policies.

Daylight, Sunlight, Overshadowing and Solar Glare

16.97 Paragraph 130 of the NPPF states that planning decisions should ensure that developments create places that have a high standard of amenity for existing and future users.

16.98 London Plan Policy D3 sets out that development proposals should deliver appropriate outlook, privacy and amenity.

16.99 Policy A1 emphasises that the Council will seek to ensure that the amenity of communities, occupiers and neighbours is protected. In particular, the Council will consider sunlight, daylight and overshadowing.

16.100 The Amenity CPG expects applicants to consider the impact of development schemes on daylight and sunlight levels and that the 45 degree and 25 degree tests cited in the BRE guidance should be used to assess whether a sunlight and daylight report is required.

16.101 In addition, the Amenity CPG sets out that levels of reported daylight and sunlight will be considered flexibly taking into account site-specific circumstances and context.

Assessment

- 16.102 The impact of the Proposed Development on daylight, sunlight and overshadowing of neighbouring properties / sensitive receptors has been assessed within Chapter 12 of the ES submitted with the Application and is summarised here.
- 16.103 Effects in relation to daylight, sunlight and overshadowing would vary throughout the demolition and construction stage. They would, however, certainly be less than the effects of the completed Proposed Development. Accordingly, no mitigation measures are required for the demolition and construction stage. Those effects which may be perceptible during construction, would be similar or less than those of the completed Proposed Development set out previously.
- 16.104 Mitigation measures that were considered necessary to reduce the effects of the Proposed Development to the levels set out above have already been embedded in the design from advice given during the design stage.
- 16.105 Whilst minor, moderate and/or major negative effects are expected to occur in terms of the daylight, sunlight, overshadowing and/or solar glare, the discussion concludes that the effects can be considered acceptable. Further mitigation measures are therefore not considered necessary.

Services and Utilities

- 16.106 London Plan Policy DF1 states that Development Proposals should provide the infrastructure and meet the other relevant policy requirements necessary to ensure that they are sustainable and to support delivery of the Plan. However, the Plan assumes that all regulated utilities infrastructure necessary to support growth will be delivered by the statutory providers and network operators.

Assessment

- 16.107 A Utility and Energy Infrastructure Statement has been prepared by Hoare Lea and is submitted in support of the Application.

16.108 The two key elements of utilities services infrastructure that have been considered to date are:

- Diversions and disconnections strategy – the impact on existing infrastructure.
- New connections and reinforcement strategy – the impact on existing infrastructure locally and upstream in accommodating the increased infrastructure demand, including meeting build out trajectory.

16.109 The Utilities Statement demonstrates that a robust utilities infrastructure strategy has been formed to support the Application, ensuring that the Proposed Development can be accommodated by the surrounding utility infrastructure, following appropriate reinforcements.

17 Planning Obligations and Community Infrastructure Levy

- 17.1 Under Section 106 of the Town and Country Planning Act 1990, Local Planning Authorities may enter into planning obligations with any person with an interest in land for the purpose of restricting or regulating the development or use of the land.
- 17.2 In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, the law states that a planning obligation may only constitute a reason to grant planning permission where it meets all of the following tests. The legal position is reinforced by paragraph 204 of the NPPF, which says that a planning obligation should only be sought where it is:
- a) Necessary to make the proposed development acceptable in planning terms;
 - b) Directly related to the proposed development; and
 - c) Fairly and reasonably related in scale and kind to the development.
- 17.3 Paragraph 54 of the NPPF states that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 17.4 Paragraph 55 of the NPPF sets out that planning obligations should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. It goes on to state that agreeing conditions is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided, unless there is clear justification.
- 17.5 Policy DF1 of the London Plan 'Delivering of the Plan and Planning Obligations' states that when setting planning obligations in Local Development Plan Documents, and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should first apply priority to affordable housing and necessary public transport improvements, and following this health and infrastructure, affordable workspace, culture and leisure facilities, in delivering good growth.

17.6 The use of planning obligations is specifically required through Local Plan Policy DM1 'Delivering and Monitoring' although a range of individual development policies may be used to justify an obligation.

17.7 Local Plan Policy DM1 states that the Council will use planning obligations, and other suitable mechanisms, where appropriate, to: support sustainable development; secure any necessary and related infrastructure, facilities and services to meet the needs generated by development; and to mitigate the impact of development.

Community Infrastructure Levy (CIL)

17.8 Since 2012, all developments in London which result in the addition of over 100sqm GIA floorspace (with some exceptions including affordable housing) have been eligible to pay Mayoral CIL. In February 2019 the Mayor adopted a new charging schedule (MCIL2). MCIL2 came into effect on 1 April 2019 and supersedes MCIL1 and the associated Crossrail Funding SPG. The relevant MCIL2 rates are as follows:

- All Development (excluding health and education) - £80 per sqm

17.9 Alongside the Mayoral CIL, the Camden CIL came into effect on 1 October 2020. The CIL tariff for sites located within Zone B (within which the location of the Site) are charged at the following rates:

- Residential of 10 or more dwellings (or above 1000sqm) - £332
- Retail (including bar/restaurant/entertainment and other town centre uses) - £32
- Office - £32
- Health, education, community meeting spaces etc. - £0
- Industry, warehousing, research and development - £0
- Other commercial uses - £32

17.10 Policy 19 of the Fortune Green & West Hampstead Neighbourhood Plan provides a list of priorities where CIL monies collected should be directed at locally. The Priorities are split into three bands:

1. Category A – Most urgent;
2. Category B – Should be provided; and

3. Category C – Also needed.

17.11 Within Category A, the following is listed: “Improvements to the train stations in the Area (including the provision of a new lift & more public spaces in and around the stations) especially West Hampstead Underground Station”. The Applicant is therefore keen that a percentage of the CIL liability from the Proposed Development should go towards improvements of station access, particularly West Hampstead and Finchley Road Stations, in accordance with the adopted Neighbourhood Plan Policy.

17.12 It is estimated that the Proposed Development would result in a CIL liability of c.£43.5m

Developer Contributions CPG (March 2019)

17.13 The CPG sets out how the Council will use Section 106 Contributions and CIL to fund infrastructure in the Borough. It states that planning obligations may be sought in respect of affordable housing, open space, and infrastructure to address the site specific and related impacts of development which may include financial, and non-financial contributions. Detailed guidance for calculating specific financial obligations is set out within the relevant CPGs.

Draft Heads of Terms

17.14 The Applicant anticipates entering into a legal agreement with LBC to secure the reasonable and necessary planning obligations associated with the Proposed Development in accordance with Regulation 122 of the CIL Regulations and LBC’s Developer Contributions CPG.

17.15 It is envisaged that during the planning application determination period the Applicant will discuss an appropriate package of Section 106 contributions with Officers.

17.16 It is anticipated that the following package of benefits of the Proposed Development will be discussed with the Council during the application process:

- Affordable housing – 35% affordable housing by floorspace (GIA) across the Site on a phase-by-phase basis;

- Affordable workspace – a minimum of 250sq. m shall be provided as affordable workspace. The terms of which shall be discussed with officers during the application process;
- Wheelchair accessible homes
- Employment and Training Strategy, to ensure that the employment and training opportunities to be created by the Proposed Development would be made available to local residents;
- Construction Apprenticeships, to ensure that the on-the-job training and qualifications are enjoyed by local residents;
- Construction work experience placements, to ensure that opportunities to gain experience would be enjoyed by local residents;
- Local recruitment for construction related jobs, to ensure that job opportunities would be enjoyed by local residents;
- Local procurement code for approval by LBC
- Health/multi-disciplinary centre – a minimum of 1,000 sq. m shall be provided if the CCG confirms a requirement for this facility;
- Feasibility study and contribution to station access improvements – at local stations including West Hampstead and Finchley Road;
- Safeguarding of land for Station improvements – an area is to be identified in the S106 to be safeguarded for an agreed period, if required,
- Community centre – a 270sq. m community centre would be provided within the Detailed Proposals;
- Free Wifi across the Site;
- Open spaces - including tree lined linear park providing an east west link through the Site and estate management of public realm on the Site
- Sustainability Plan;
- Car free development, to assist with sustainability given the Site's accessibility to public transport and the links that will be created which would increase the attractiveness of walking and cycling
- Site specific transport measures – as set out within the Transport Assessment including but not limited to Bus and pedestrian improvements including at Granny Dripping Steps
- Estate management and servicing Strategy; and
- Carbon offsetting.

18 Summary and Conclusions

- 18.1 This Town Planning Statement (“the Statement”) has been prepared by Gerald Eve LLP on behalf of LS (Finchley Road) Limited (the “Applicant”), to support an application made in part in detail and part in outline (the “Application”) for the demolition and redevelopment of land encompassing the O2 Centre and associated car park, Homebase store, car showrooms and a Builder’s Merchant (the “Site”) within the London Borough of Camden (“LBC”).
- 18.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires proposals to be determined in accordance with the statutory development plan unless material considerations indicate otherwise. This Statement has assessed the Proposed Development against the development plan and other relevant planning policy and guidance at national, regional and local policy level.
- 18.3 This Statement has provided a comprehensive review and analysis of national, regional, local and neighbourhood planning policy and guidance which applies to the Proposed Development. It sets out the planning case for the scheme, having full regard to Development Plan policies and other material considerations and should be read in conjunction with the other supporting documents submitted in support of the Application.
- 18.4 The Proposed Development is in accordance with the Statutory Development Plan, when read as a whole and on this basis planning permission should be granted without delay. In addition, the strong material considerations pertinent to this Application also indicated that planning permission should be granted.
- 18.5 The Proposed Development has been subject to extensive consultation³⁴ for a period of approximately two and a half years, up to the submission of this Application in January 2022. The feedback received and how the Proposed Development has evolved in response to the consultation is set out in this document and in the DAS prepared by AHMM.

³⁴ See paragraph 7.43 of this Statement

- 18.6 The Applicant's vision is to create an inclusive place that works for all. A place that integrates and connects the communities of Finchley Road and West Hampstead. A new neighbourhood that reflects Camden's unique culture and provides something for everyone – a mix of homes where people and families can stay and grow; jobs and local opportunities; shops, restaurants, leisure and community facilities; and new green public spaces to relax with friends and family.
- 18.7 The Site currently contains the O2 Centre, a Homebase store, a Builder's Merchants, two car showrooms and a large 520 space surface level commercial car park. The Site is surrounded by roads or railway lines to the north and south and provides little in the way of east - west permeability between Finchley Road and West End Lane. It presently impedes the connection of the surrounding communities.
- 18.8 The comprehensive redevelopment of the Site provides an opportunity to open up an area of poorly accessible land, largely dominated by car parking, to the wider community, and would allow people to walk and cycle directly between West Hampstead to Finchley Road in a green, integrated, attractive and safe environment. This is a considerable benefit and as set out in the proceeding chapters is in line with adopted and emerging planning policy documents.
- 18.9 The comprehensive approach to the Site allows for a landscape led masterplan which would create a considerable quantum of public realm within the Proposed Development, equating to over 50% of the Site. This includes green spaces, landscaped spaces, play spaces and recreational facilities for children and people of all ages including a MUGA; it is designed as a place for everyone.
- 18.10 The demolition of the buildings on the site have been assessed against policy in respect of whole life carbon and the principles and objectives³⁵ set out within the West End Lane to Finchley Road SPD (September 2021) where demolition is proposed. It has been demonstrated in this Statement that the Proposed Development fully meets the objectives and principles.

³⁵ See paragraph 7.17 of this Statement

- 18.11 The Proposed Development would provide a significant quantum of residential accommodation which would aid housing³⁶ (including affordable housing) delivery within the borough and make a significant contribution to LBC's housing waiting list. The significant quantum of housing of both private and affordable should be given significant weight in the determination of this application. A residential led, mixed use comprehensive redevelopment on the Site is supported by planning policy at all levels.
- 18.12 Whilst there would be a loss of town centre floorspace at the Site it has been demonstrated that the existing position is unsustainable³⁷ and that the current offer of big box retail and out of centre uses does little to aid town centre policy objectives or the recovery of the Finchley Road Town Centre and is predominately supported by the large underutilised carpark. The Site currently underperforms in terms of its role within the town centre.
- 18.13 The Applicant recognises that having a convenience retail use at the Site is important to the surrounding communities. Therefore, the proposed development includes provision for a supermarket offer, but in a format that meets market expectations and allows it to adapt to the changing retail market to ensure sustainability and longevity of the new spaces
- 18.14 The cinema, gym and food and drink uses are re-provided across the Site, providing a place where people come in the day, and the night.
- 18.15 The Proposed Development focuses the retail floorspace within the Development Plots that sit within the town centre. By providing a balance of uses, with the new permeability of the Site and the creation of a 'new front door', the Proposed Development would revitalise the vitality and vibrancy of the town centre. It would provide residents of the new neighbourhood and those in the surrounding community diverse and creative local amenities through diversity of use, and function.
- 18.16 Notwithstanding the loss of town centre use floorspace, the Proposed Development would provide between 545 and 758 Full time jobs in the completed development, an

³⁶ See Paragraph 9.54,9.79 and 9.80 of this Statement

³⁷ See paragraphs 9.99-9.118

uplift of between 80 and nearly 300 on the current on site employment. Therefore, the Policy objectives are met, and the proposals justified in policy terms.

18.17 Appropriate community facilities are provided across the O2 Masterplan Site. Space for a community use/centre is integrated into the first phase to help foster cohesion within the new neighbourhood and help it knit into the surrounding community. Provision for a new multidisciplinary health centre is made which, together with the community centre will provide a hub for the new neighbourhood.

18.18 The comprehensive benefits that flow from the Proposed Development are substantial and address Camden's key objectives in its 2025 Vision:

- Everyone in Camden should have a place they call home;
- Growth in Camden should be strong and inclusive – everyone should be able to access the work that is right for them;
- Camden should be safe, strong and open, and everyone should be able to contribute to their community;
- Camden should be a clean, vibrant and sustainable place; and
- Everyone in Camden should be able to live a healthy, independent life.

18.19 A summary of benefits provided by the Proposed Development and discussed within this Statement is set out below.

18.20 The proposals align with Camden's aspirations for Site. In particular the development aids in working towards the Council's vision for the Borough by 2025 by:

v. Providing a place for people within Camden to call home and access to the work that is right for them. The Proposed Development would:

- f. Deliver a mixed- use development in a sustainable location providing new homes (the Applicant is anticipating that the homes will be Build to Rent ('BTR')) and jobs. It will deliver around 1,800 new, high-quality, homes for BTR³⁸ including genuinely affordable homes (35% of all

³⁸ Equating to 17% of LBC's 10-year housing target and circa 10% of LBC's current affordable housing waiting list

homes will be affordable by floorspace split 60:40 Low Cost Rent: Intermediate Rent);

- g. Provide over 19,500 sqm of non-residential floorspace, including flexible affordable workspaces, retail, food and drink, leisure, office and maker spaces providing a broad range of employment opportunities;
- h. Generate an average of 300 FTE construction jobs over the c. 15-year construction period. This equates to 4,560 person years' worth of labour
- i. Deliver up to c. 760 FTE jobs in the completed development;
- j. Generate over an estimated £29 million in household spending in the local economy – benefiting local businesses and their employees;

vi. Creating a safe, strong and open place where everyone can contribute to their community. The Proposed Development would:

- j. Transform the existing Site by delivering a mix of residential, town centre, leisure, food and drink and workspaces that deliver a vibrant and animated new community in turn supporting the success of existing town centres to the east (Finchley Road) and west (West Hampstead);
- k. Deliver, through comprehensive development, a seamless east west link through the Site that is green and has intrinsic value that meets the three pillars of sustainability³⁹;
- l. Create well- connected and accessible services to deliver social value by ensuring the people are able to make the most efficient and safe use of the built environment;
- m. Level access throughout the Site so everyone can benefit from the services, business, homes;
- n. Provide training, apprenticeship and skills initiatives;
- o. Diverse employment uses including for independent businesses;
- p. Provide new services supporting the community: significant community facilities including a multidisciplinary health centre, community centre and creche;

³⁹ The east-west link will aid: **the environment** by significant greening, aiding biodiversity and providing a seamless link for walking and cycling to promote sustainable forms of transport in the wider area; **Social integration and equality** by linking neighbourhood and communities; **Economic** joining two town centres to help promote the local high street and improve linked trips. –.

- q. Improved transport accessibility by sustainable means including cycling and walking;
- r. Free wifi across the site, open to all, supporting easy and efficient public use of the Proposed Development;

vii. Creating a clean and vibrant sustainable place. The Proposed Development would:

- e. Provide design features within the open space for public activities;
- f. Offer Play spaces for all ages and a new Multi-Use Games Area (MUGA); and
- g. Incorporate a public art strategy and public event programme secured through an Estate Management Plan;
- h. Achieves a 50% reduction in existing proven discharge rates and runoff volumes, reduced by 450m³ through measures such as 44% permeable open space to aid climate resilience to flooding by necessary and appropriate mitigation.

viii. Creating a place where everyone can live a healthy and independent life.

The Proposed Development would:

- h. Reduce car borne trips and increase sustainable transport modes;
- i. Provide health services if required;
- j. Provide community gardens;
- k. Provide growing spaces for resident groups and associations; and
- l. Provide a green neighbourhood with over 50% of the Site (3.14ha) public realm and around 2.29ha of public Open Space for all⁴⁰;
- m. Increase biodiversity net gain >165.43% helping to improve local air quality and wellbeing; and
- n. Reduce operational carbon emissions onsite and passive design and energy efficiency measures to provide a built environment that looks to a sustainable future.

⁴⁰ Provide a phased delivery of public realm and open space to support linkages with the wider area

18.21 The Application accords with national, regional and local policy objectives to deliver sustainable, mixed-use and balanced communities and should therefore be approved.

Appendix A

O2 Finchley Road
Planning History

LPA Ref	Address	Date Validated	Description	Decision	Decision Date
2021/2770/P	The O2 Centre	08/06/2021	Request for scoping opinion under Paragraph 4, Regulation 15 of the Town and Country Planning Environmental Impact Assessment (EIA) Regulations 2017, for proposed development involving delivering a significant number of homes to help meet the current housing shortfall in LBC as well as new commercial uses that will create local jobs.	Pending	
2020/1953/P	O2 Centre	22/04/2020	Use of premises for takeaway use (Class A5) for the duration of the deemed consent given under The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2020.	Notified	10/06/2020
2019/0684/P	Unit 8D, The O2 Centre	23/04/2019	Change of Use from A3 (restaurant) to a flexible A3/D2 (gym/spa) use.	Pending	
2018/1489/P	Unit 7c Level 2 The O2 Centre	25/04/2018	Change of use from A3 (restaurant) to D2 (gym) use.	Granted	24/05/2018
2016/6769/P	The O2 Centre	12/01/2017	Replacement of first floor 9no glazing panel window with new structural glazing window to commercial centre.	Granted	03/03/2017
2016/3536/P	The O2 Centre	29/06/2016	Replacement of the first floor glazing screen with a frameless structural glazing screen on Finchley Road elevation.	Withdrawn	
2015/4880/P	Starbucks rear of The O2 Centre	26/08/2015	Erection of glass barrier to surround external seating area and 2no. new umbrellas.	Granted	23/10/2015
2014/4396/P	Homebase Ltd	04/08/2014	Extension to first floor mezzanine for retail use and installation of two external fire exit doors.	Withdrawn	
2013/0932/P	The O2 Centre	02/04/2013	Details pursuant to condition 3 (sample material) of planning permission dated 23/10/2012 (ref:2012/1333/P) for alterations to	Granted	09/05/2013

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			front facade and extension to provide additional retail and restaurant floorspace.		
2012/4271/P	Unit 4c The O2 Centre	17/08/2012	Non-material amendment to planning permission granted 28/01/11 (Ref: 2010/6578/P) for the installation of a new shop front to public house (Class A4), namely to replace glazed entrance on north elevation with full-height window and amend full height glazing to retain brick/stone banding detail at ground floor level.	Granted	30/08/2012
2012/4143/P	Unit 4c The O2 Centre	16/08/2012	Application to vary condition 2 (the development in accordance with approved plans) of planning permission dated 28/01/2011(Ref 2010/6578/P) for the installation of a new shop front to public house (Class A4). Amendment seeks to provide sliding doors at the front of the unit.	Granted	04/10/2012
2012/2763/P	The O2 Centre	30/05/2012	Amendment to planning permission granted on 31/01/2011 ((ref: 2010/6573/P) for the alterations to front elevation to include new double swing entrance doors at ground floor level to replace existing, realignment of external wall at ground and first floor level and new glass frame at first floor level above entrance doors and creation of door entrance for proposed lobby with new frameless glass at ground floor level) comprising the inserting of a shop window into the flank elevation of the front entrance in relation to Unit 3.	Granted	22/06/2012
2012/1531/P	The O2 Centre	22/03/2012	Alterations to front facade, including relocation of entrance lobby with level access, widening of fire escape stairs to Unit 3, re-alignment of external side wall leading to main entrance, and new entrance doors with level access to Unit 3 in relation to planning permission dated 31/1/2011 (ref. 2010/6573/P) for alterations to front elevation.	Granted	18/04/2012

O2 Finchley Road
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2012/1334/P	The O2 Centre	14/03/2012	Alterations to front facade including installation of glazed entrance lobby and doors at ground floor level to shopping centre.	Granted	30/04/2012
2012/1333/P	The O2 Centre	14/03/2012	Alterations to front facade including infill extension beneath existing front roof canopy at ground and first floor levels to provide additional retail (class A1) and restaurant (Class A3) floorspace and creation of terrace at first floor level.	Granted	23/10/2012
2011/2641/P	The O2 Centre	16/06/2011	Retention of four ticket machines and associated shelter within car park of O2 Centre.	Granted	14/07/2011
2011/1169/P	The O2 Centre	24/03/2011	Alterations and infill extension beneath existing front roof canopy at ground and first floor levels to provide additional retail (Class A1) and restaurant (Class C3) floorspace, including the creation of first floor terrace area, and replacement and realignment of existing front facade with new glazed facade.	Withdrawn	
2010/6586/P	The O2 Centre	06/12/2010	Creation of restaurant (Class A3) by extending first floor over central atrium within the existing shopping mall (O2 Centre).	Granted	03/05/2011
2010/6578/P	Unit 4C The O2 Centre	06/12/2010	Installation of a new shop front to public house (Class A4).	Granted	28/01/2011
2010/6573/P	The O2 Centre	07/12/2010	Alterations to front elevation to include new double swing entrance doors at ground floor level to replace existing, realignment of external wall at ground and first floor level and new glass frame at first floor level above entrance doors and creation of door entrance for proposed lobby with new frameless glass at ground floor level.	Granted	2010/6573/P
2009/4698/P	Unit 2 O2 Centre	19/01/2010	Partial change of use from gym (Class D2) to Retail Shop (Class A1)	Granted	19/01/2010

O2 Finchley Road
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2007/4847/P	The O2 Centre	24/10/2007	Installation of a new management suite mezzanine (Class B1)	Granted	06/12/2007
2007/4320/P	The O2 Centre	17/09/2007	Installation of mezzanine floor above Unit 3 for retail use (Class A1) within the O2 Centre.	Granted	21/12/2007
2007/1386/P	The O2 Centre	30/04/2007	The erection of a mezzanine floor above part of the void created by the central atrium at first floor level, for use as a restaurant (Class A3)	Granted	15/06/2007
2007/1379/P	The O2 Centre	27/03/2007	Installation of a juice bar to the central atrium of the O2 Centre	Granted	11/05/2007
2007/1388/P	The O2 Centre	27/03/2007	Minor increase to Class A3 floorspace within the O2 Centre with the installation of a coffee shop to central atrium.	Granted	11/05/2007
2007/0239/P	231 Finchley Road	30/01/2007	Installation of a new shopfront.	Granted	01/03/2007
2006/1610/P	Unit 4, 4A, 4B, Level 1 The O2 Centre	26/04/2006	Creation of a new mezzanine floor plus a ground floor extension into the mall to provide additional Class A1 retail space, in association with the change of use of the ground floor from a restaurant (Class A3) to retail (Class A1) unit, together with alterations to the shopfronts facing Finchley Road	Granted	27/06/2006
2005/3702/P	279 Finchley Road	25/10/2005	Erection of a single storey car valet building on west rear side of car showroom and servicing dealership.	Granted	25/10/2005
2004/0246/P	The O2 Centre	28/01/2004	The construction of a mezzanine floor within unit 3 for dual Class A1/A3 use and insertion of entrance doorway to unit 3 on the Finchley Road elevation.	Granted	06/07/2004
2004/5103/P	277 Finchley Road	28/04/2005	Alterations to existing perimeter fence facing service road to create an opening and gate for refuse removal.	Granted	14/06/2005

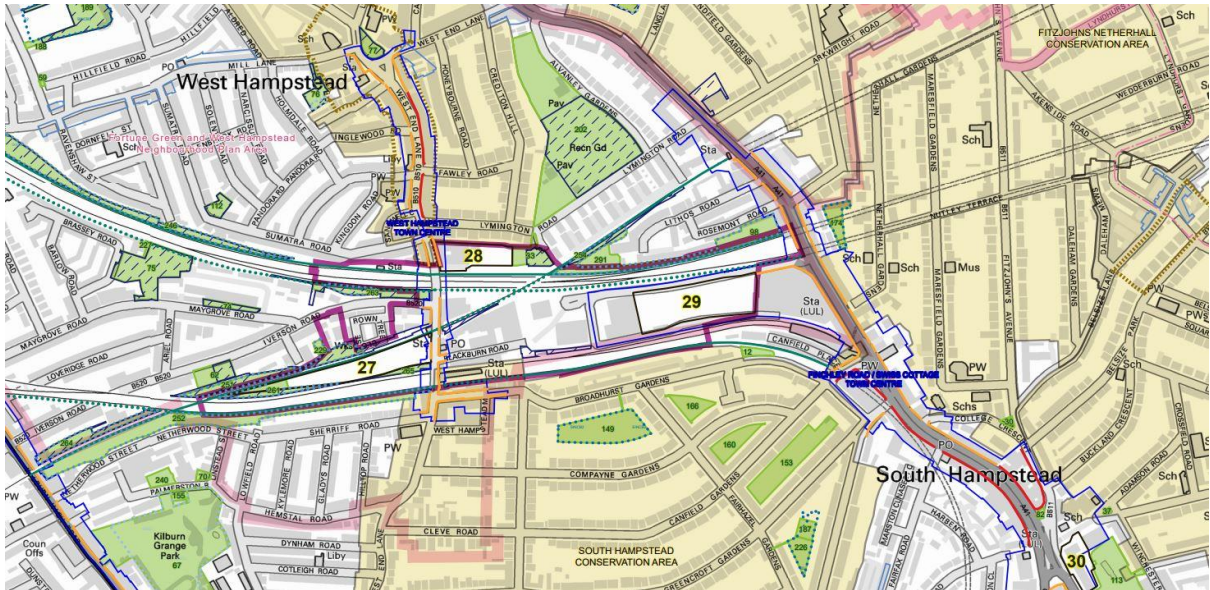
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2004/0246/P	The O2 Centre	28/01/2004	The construction of a mezzanine floor within unit 3 for dual Class A1/A3 use and insertion of entrance doorway to unit 3 on the Finchley Road elevation.	Granted	06/07/2004
2003/0909/P	The O2 Centre	28/07/2003	The construction of a mezzanine floor within Unit 3A, to provide an additional 52 square metres of Class A3 floorspace.	Granted	01/10/2003
PWX0002896	The O2 Centre	02/03/2001	Erection of entrance lobby on Finchley Road elevation. As shown on drawing numbers LR1;1600/F/1,2,3 and 1600/P/003.	Granted	13/03/2001
PWX0002422	The O2 Centre	12/05/2000	Erection of additional Class A1 retail accommodation inside the Centre, in the form of 5 kiosks in the internal mall and one unit at the rear of it, As shown on drawing numbers; LR1; 1600/P/1 and 2.	Granted	04/09/2000
PW9802758	Land to R/O, 241-279 Finchley Road NW6	02/10/1998	Erection of a free standing canopy at the rear of the 'Homebase' store, as shown on drawing numbers: 1792/03, /11RB and /14RC.	Granted	14/01/1999
PW9802528R1	Unit 9, O2 Centre, 241-279 Finchley Road, NW3	15/09/1998	Provision of a mezzanine floor for use as additional restaurant floorspace, as shown on drawing numbers: L122.11/10; L122.11/02; TKP 002 D; TKP 004.	Granted	08/10/1998
PW9802301	Unit 7, Level 2, OZ Centre, 241-279 Finchley Road NW3	22/04/1998	Provision of a mezzanine floor for use as additional restaurant floorspace, as shown on drawing numbers; 9712.AN001A/AN002/EX001/L0001/L0010.	Granted	13/08/1998
PW9802219	Land to r/o 241-279 Finchley Road	26/03/1998	Erection of a freestanding glazed canopy to the rear of the 'Homebase' store, as shown on drawing numbers: 1792/03, /11 and /14.	Granted	08/05/1998
9501238R2	Land to the rear of 241-279 Finchley Road NW3	30/04/1996	Redevelopment of land to the rear of 241-279 Finchley Road by the erection of a 3 storey development comprising a mix of retail, leisure and restaurant use and a Sainsbury's food store fronting Finchley Road, and by the erection of a non food retail store to the rear, together with the formation of a new access road and traffic light controlled junction with Finchley	Granted	13/09/1996

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			Road and the provision of a surface level car park for 561 cars. as shown on drawing no(s) A201J. A202J, A203J, A204J, A205, 230/04A, A302C, A301C, A401J, A402, A403, A220/A/B, 230/05A 4761/4P/H, 12073/18A, 12073/20B, A/500, A250/T, 12073/24.		
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Appendix B



General

- Growth Area
- Central London Area
- Site Allocations proposal site (see below for names)
- Fitzrovia Area Action Plan
- Euston Area Plan
- Regent's Park Estate housing renewal and infill
- Euston station and tracks special policy area
- Areas with Neighbourhood Plans approved at referendum (refer to the Neighbourhood Plan at www.camden.gov.uk/NeighbourhoodPlanning)

Town centres and employment

- Central London Frontage
- Town Centre
- Neighbourhood Centre
- Industry Area
- Hatton Garden Area
- Protected frontage: primary, secondary
- Primary (north)", sensitive frontage"
- *located in Camden Town only*

Built environment

- Conservation Area
- Ancient Monument
- Archaeological Priority Area
- Designated Views:
 - Viewing Corridor
 - Lateral Assessment Area
 - Background Assessment Area

Transport

- Safeguarding Area
- High Speed 2:
 - HS2 Surface
 - HS2 Sub Surface
 - HS2 Homeowner Protection Zone 1
 - HS2 Homeowner Protection Zone 2

Natural environment and open space

- Open Space
- Metropolitan Open Land
- Site of Special Scientific Interest
- Ancient Woodland
- Metropolitan Walk
- Habitat Corridor, missing link
- Regent's Canal
- Sites of Importance for Nature Conservation:
 - Local
 - Borough Grade 1
 - Borough Grade 2
 - Metropolitan
 - Local Green Space

Waste and minerals

- Waste Safeguarding Site
- Aggregate Safeguarding Site

Appendix C

Total GIA Floorspace by use for Detailed Proposals

Land Use	Use Class	Plot N3-E (GIA Sqm)	Plot N4 (GIA Sqm)	Plot N5 (GIA Sqm)	TOTAL
Residential including car parking	C3	5,269	23,420	26,491	55,180
Community	F2	0	270	0	270
Retail	E (a)	186	186	1,361	1,733
Food and drink	E (b)	114	0	0	114
Professional Services	E (c)	0	155	0	155
Sub station		Included in Resi GIA			
Total Includes all built floorspace – plant, podium car parking, BOH etc8		5,569	24,031	27,852	57,452

*Plant and BOH has been pro-rated between the uses set out within table 4.

**Maximum Residential and Commercial/Non-Residential floorspace (GIA) by
Development Plot for Outline Proposals**

Plot ID	S1	N1	N2	N3	N6	N7	S8	Use Cap
								MAXIMUM not to be exceeded
Use	SQM	SQM	SQM	SQM	SQM	SQM	SQM	SQM
Residential (including carparking and basements)	12,100	16,850	25,400	24,500	6,100	21,650	8,400	115,000
Class C3								
Commercial/Non Residential Total	4,550	6,700	2,500	500	300	1,810	1,050	<u>17,410</u>
TOTAL	<u>16,650</u>	<u>23,550</u>	<u>27,900</u>	<u>25,000</u>	<u>6,400</u>	<u>23,460</u>	<u>9,450</u>	-
Total Floorspace not to be exceeded								<u>132,410</u>
Individual Plot Area Not to be exceeded	16,650	23,550	27,900	25,000	6,400	23,460	9,450	132,410

Notes

- i. The total floorspace across the Site for the Outline Proposals will not exceed 132,410 sqm GIA
- ii. The Table includes all built floorspace including internal podium, basements, car parking, service yard, BOH etc.