

**From:** Secretary  
**Sent:** 03 August 2022 18:47  
**To:** David Fowler  
**Subject:** comment on Application 2022/0528/P - O2

**from: West Hampstead Gardens and Residents Association.**

We wish to object to the application 2022/0528/P - the Landsec/Camden development at the O2 centre and car park - on the basis that the material, social and environmental harms resulting from the excessive scale of the scheme are unacceptable. A number of issues are covered below but this is just a selection of the shortcomings in this application.

The unjustified effort to crush 1800 dwellings into an area just under 8 football pitches in size demands heights up to 16 storeys – and a layout at a density six times Camden’s average. These factors were recognised by Camden’s Design Review Panel of 6/11/2020 - quoted below in italics:

*‘The panel suggests heights of six to eight stories, particularly toward the centre of the site, would feel more appropriate. The team should experiment with separation distances to understand the densities that can be created with a mansion block typology rather than towers’*

and

*‘Blocks of up to eight stories would allow reasonable daylight into the residential courtyards ...’*

## **Design**

*This scheme fails to reflect local design policies and government guidance on design. The National Planning Policy Framework in section 130 a) & b) states the requirements for achieving well-designed places: “Planning policies and decisions should ensure that developments:(a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

The architecture is repetitive, poorly detailed and lacks relationship to the local surrounding area. Building heights across the site are incoherent and there is a mis-match of styles and materials.

The different blocks relate poorly to each other not only in distant views but also in the public realm between them. The overall impression is of an

uninteresting, generic and intrusive design that lacks integration with its surroundings and could be found in any city across the world.

### **Tenure and Layout**

Tall buildings offer increased profits for developers but, the higher a building rises, the more expensive is the construction. The tallest buildings tend to be luxury units, often for global investors. and these increase social division. The so called 'new neighbourhood' of the O2 site encourages inequality and disconnection between the host community and a transient (rental) population and isolation for those living within the massive towers .

The dwelling mix of flats: The mayor's role as regional housing authority stipulated that 48% of new homes should have at least three bedrooms; yet 89.3% of the proposed 602 homes described by Ploughman Craven in the detailed first stage of construction - N3-E, N4, and N5 - will be studio, 1-bed and 2-bed flats. amounting to 89.3% of the proposed 602 homes.

Single aspect homes: The prevalence of single aspect flats within the proposals causes negative sunlight and shadowing impacts as well as serious ventilation issues in a climate crisis (as seen in historic heatwave July 2022). 272 (45%) of the 608 homes included in the Detailed Proposals of the O2 scheme will be single aspect dwellings.

Over 800 single aspect flats are also planned for the Outline application buildings contrary to Camden's policies which only allow single aspect in exceptional circumstances and the Mayor of London's Housing Guide Standards 4.1.1 & 5.2:

*'The Mayor believes dual aspect should be the first option that designers explore for all new development'.*

The homes in this application should be dual aspect unless there are compelling reasons why that cannot be achieved. No such reasons have been given. The site sits between busy railway/tube lines and the flats should generally have at least two habitable rooms, each with a window as deep, narrow, single aspect studios are unlikely to provide a suitable quality of accommodation.

Dual aspect has multiple benefits including ventilation, outlook, options in areas with poorer air quality or noise generators and the possibility of a window to the kitchen and bathroom.

### **Affordable Housing**

Under Camden Local Plan Policy H4 requiring 50% affordable housing this scheme offers only 35%— any development of this size and impact should not be passed with reduced affordable housing, based on the developers convenient 'viability' assessment.

#### **Drainage and Water Supply** - Thames Water Comments 14/3/2022

- *'The applicant has not sufficiently demonstrated compliance with the drainage hierarchy set out in the London Plan, Policy SI 13. or explained why rainwater harvesting is not proposed.'*
- *...capacity exists within the water network to serve 100 dwellings but beyond that upgrades to the water network will be required.*
- *There shall be no occupation beyond the 100th dwelling until confirmation has been provided that either: - all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed...'*

#### **Sustainability**

Energy performance: In the current (and future) energy cost conditions, the performance of tall buildings is unfavourable. Researchers at UCL's Energy Institute found that **electricity use, per square metre of floor area, is nearly two and a half times greater in high-rise buildings.... than in low-rise buildings of 6 storeys or less.**

We strongly request that the Planning Committee consider this application's failures carefully and withhold permission so that the applicant can rethink and redesign it in good faith - to optimise the benefits rather than the profits of this site.

Association Officers  
West Hampstead Gardens & Residents Association  
(WHGARA)