



# GERALDEVE

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**FAO: David Fowler**

**Our Ref:** U0011576

**Your Ref:** 2022/0528/P

20<sup>th</sup> September 2022

Dear Sir,

## **O2 Centre Masterplan Site, Finchley Road – Scheme Amendments**

We write on behalf of LS (Finchley Road) Limited (“the Applicant”), in relation to the proposals for the O2 Centre Masterplan Site (“the Site”) and to formally submit amendments to the scheme.

### **Introduction and Background**

A hybrid planning application (“the Application”) for the redevelopment of the Site was submitted to the London Borough of Camden (“LBC”) on 1 February 2022 (application ref. 2022/0528/P).

The Application seeks planning permission for 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”.*

In the time since the application was submitted, a number of consultation responses have been received<sup>1</sup>. It is on this basis that the Applicant has reviewed the proposals and has proposed changes to the scheme. Changes are proposed to the detailed (the “Detailed Proposals”) and the outline elements (the “Outline Proposals”) of the application.

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<sup>1</sup> A summary of the comments received are set out within the Design and Access Statement Addendum.

In respect of the detailed elements of the application, in particular, significant changes at basement and ground floor levels are proposed to respond to the fire safety recommendations of BS9991<sup>2</sup>. This includes, but is not limited to, the provision of a stair and lift pressurisation system, a dedicated evacuation lift lobby, and an evacuation alert system for use by the fire service. The fire safety guidance has come into practice during the determination period of the application and so was not accounted for at the time of submission. Other comments such as those from the Council's environmental and waste team and the GLA have also led to changes being proposed.

In addition to the changes to the detailed part of the application, and following design workshops with London Borough of Camden (LBC) Officers, the Design Codes for the outline part of the application have been strengthened by the addition of new "rules" which provide greater certainty in respect of architectural form that can be brought forward at the reserved matters stage. This results in benefits for townscape and placemaking. These changes are set out within the Revised Design Codes, accompanying this letter.

This letter provides a summary of the proposed changes to the application. Where planning considerations have changed as a result of the changes, it provides an update to the Planning Statement prepared by Gerald Eve LLP (dated January 2022), which was submitted in support of the application in February 2022.

This cover letter should be read alongside the full suite of addendum/revised planning application documents, which consider the scheme amendments, and which are formally submitted to LBC for consideration as part of application ref. 2022/0528/P. The documentation submitted in support of the revised proposals is as follows:

- Revised Development Specification Document;
- Revised Design Codes;
- Revised Proposed Plans in respect of the detailed part of the application;
- Addendum Design and Access Statement;
- Addendum Affordable Housing Statement;
- Revised Basement Impact Assessment;
- Revised Waste Management Strategy;
- Addendum Fire Statement;
- Revised CAVAT Assessment;
- ES Letter of Conformity with appended Revised Internal Sunlight and Daylight Report, Revised Drainage Strategy and Addendum Transport Assessment and Station Access Study.

In addition to the above list, appended to this letter (**Annex A** and **B**) are two explanatory statements setting out the amended Open Space and Urban Greening provision within the proposals.

### **Proposed Changes to the Detailed Element of the Application**

The proposed changes to the detailed part of the planning application are set out within the Addendum Design and Access Statement prepared by AHMM Architects. A summary list of the proposed changes is set out below:

- Changes to cycle access and reconfiguration of cycle store to Plots N3E, N4 and N5;

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<sup>2</sup> Fire safety in the design, management and use of residential buildings.

- Commercial space is reconfigured along with refuse and bulk store for Plots N3E, N4 and N5;
- Additional plant in Plot N3E at podium level;
- Amendment to plant allocation at roof level to Plots N4 and N5;
- Façade adjustments to allow for internal plan configuration to Plots N3E, N4 and N5;
- Changes to unit size mix predominantly to Plots N4 and N5 but also a minor change to Block N3E;
- Introduction of pressurization plant and associated fire related amendments including but not limited to natural smoke shaft to Plots N3E, N4 and N5;
- Amendment to layout of blue badge parking to Plots N4 and N5;
- Residential entrance and floor layout reconfiguration to Blocks N5A and N5C including additional floorspace;
- Reconfiguration of commercial spaces at ground floor in Plots N3E, N4 and N5;
- Amendments to wheelchair units predominantly in Plots N4 but also a minor change to Plots N5;
- Reconfiguration of PV panels to Plots N4 and N5;
- Full basement to Plot N3E;
- Removal of one townhouse from Block N4C;
- Basements / semi-depressions now proposed below Plots N4 and N5; and
- Removal of two townhouses on ground floor of Block N5A.

There are no significant changes to the height and massing of the Detailed Proposals. The internal layouts have been reconfigured to take into account technical responses, from various consultees, including LBC Waste team, and new fire safety guidance. This leads to a reduction in some of the commercial floor areas from Plots N3E, N4 and N5<sup>3</sup>. The floor area changes are set out in the Revised Development Specification Document. There is no proposed change to the number of residential units for the Detailed Proposals but the affordable housing quantum has increased to 36% (from 35%) and there are minor changes to the unit mix. These are set out in **Annex D**, as well as the revised Development Specification Document.

### **Proposed Changes to the Outline Element of the Application – Design Codes**

Some changes are proposed to the Design Codes for Plots N1, N2 and N7 and a Revised Design Codes document is submitted formally to LBC.

The Design Codes document is a control document for the fully designed development, setting the design rules and guidelines which the reserved matters design and scheme that is delivered must incorporate or have regard to. Some of these are mandatory, and therefore must be followed, and some are guidelines.

Whilst no changes are proposed to the Parameter Plans as part of the scheme revisions, the changes to the Design Codes set out further rules which must be followed to moderate and limit the scale and massing that can come forward in the fully designed development.

In order to demonstrate how the Outline Proposals could come forward as a fully designed scheme (that accords with the Outline Application Framework<sup>4</sup>), an Illustrative Masterplan was submitted with the planning application in February 2022. This Illustrative Masterplan is not consistent with the requirements

<sup>3</sup> For instance, on Plot N3-E retail use has reduced from 186sq. m to 137 sq. m and in Plot N5 retail has reduced from 1,361 sq. m to 1,073 sq. m

<sup>4</sup> Parameter Plans, Design Codes and Development Specification Document.

of the revised Design Codes and therefore the Applicant has prepared a new Illustrative Masterplan which accords with the new Codes. This is included within the Addendum Design and Access Statement.

The amendments to the Design Codes for Plots N1 and N2 include:

- The maximum length of the taller elements must not exceed 60% of the overall plot length.
- There must be variation in the height of the taller buildings.
- There should be variation in the location of the taller buildings relative to the neighbouring plots or buildings.
- Roofs along Finchley Road must have more varied articulation. They should be expressed as pitched.

The amendments to the Design Codes for Plot 7 include:

- The maximum length of the tallest element of the western building must not exceed 40% of the overall plot length.
- There must be variation in the height of the western building's blocks.
- There must be variation in buildings' form.

### **Proposed Changes to the Outline Element of the Application – Development Specification Document**

In order to respond to comments from LBC Housing on the proposed unit mix for the Outline Proposals some changes have been made to Table 8 in the Revised Development Specification Document.

The amendments seek to remove the potential provision of Low Cost Rent studios, increase the percentage range of 2-bed Low Cost Rent units, and increase the percentage range of studio and 1-bed Intermediate Rent units.

### **Planning Considerations**

This section of the cover letter provides updates to the planning considerations section of the submitted Town Planning Statement (“TPS”), prepared by Gerald Eve and dated January 2022, where the considerations have changed, or further clarification is necessary.

The planning considerations that are updated below are as follows:

- Land Use;
- Heritage, Townscape and Views;
- Landscape, Public Realm and Trees;
- Transport, Servicing and Waste; and
- Other technical considerations.

### **Land Use**

#### *Quantum of land uses*

Paragraph 5.25 of the TPS provided a table of the proposed floorspace for the Detailed Proposals. This table has been amended in the Development Specification Document and is set out in **Annex C**.



### *Residential*

The Detailed Proposals now include a total of 56,746 sq. m GIA of residential floorspace (Class C3) including an allowance for car parking in the podium. The Outline Proposals remain unchanged and include a total of 115,000 sq. m GIA of residential floorspace (Class C3). Therefore, the total residential use across the Site, including residential parking in podiums could now be up to 171,746sq. m GIA (previously 170,180sqm GIA). The Detailed Proposals still comprise 608 new homes.

As a result of the scheme revisions, the Detailed Proposals now provide 36% (+1% from the February 2022 scheme) affordable housing by floorspace (GIA). This supersedes paragraph 2.7, 5.30 and 9.79 of the TPS, where reference is made to 35% affordable housing by floorspace (GIA). For the Outline Proposals, the affordable housing provision remains at 35% by floorspace (GIA).

For the Detailed Proposals the affordable housing will include Low-Cost Rent and Intermediate Rent Housing at a ratio of 60:40. An amended housing mix is set out in **Annex D**.

For the Outline Proposals there is a slight change in the proposed unit mix ranges, as shown in Table 8 of the Revised Development Specification Document. The amendments seek to remove the potential provision of low-cost rent studios, increase the percentage range of 2-bed low-cost units, and increase the percentage range of studio and 1-bed intermediate rent units, bringing the proposals more in line with Camden's Dwelling Size Priorities table within the Local Plan.

### *Affordable Commercial Space*

The Development Specification Document has been amended to allow for affordable retail to be provided as well as affordable workspace (together referred to as affordable commercial space). The redevelopment of the O2 Finchley shopping centre forms part of the development proposals and accordingly, the opportunity to provide some affordable retail as part of the proposed scheme is considered appropriate. It will also allow the proposals to foster a more diverse range of new businesses and will provide further activation and animation across the Masterplan Site.

The Revised Development Specification Document allows for the affordable commercial space to be provided across the development phases in agreement with LBC.

## **Heritage, Townscape and Views**

### *Townscape Assessment of Scheme Revisions*

Tavernor Consultancy have reviewed the proposed amendments to the Detailed Plots and the updated Design Codes for the Outline Plots. Their conclusions, as set out in the ES Letter of Conformity, are repeated below:

"The proposed Revised Design Code (AHMM, September 2022) provides amendments to the previously submitted Design Code (dated January 2022) in relation to townscape, built heritage and visual considerations. Whilst the overall assessment and conclusions of the previously submitted THVIA (dated January 2022) remain unchanged, the Updated Design Code rules have the potential to result in positive effects when assessed at Reserved Matters Application stage".

### *London Plan Policy D9 – Tall Buildings*

The GLA Stage I Report, dated 11 April 2022, requested that the applicant demonstrate how the proposals meets Part C of Policy D9 on tall buildings. **Annex E** sets out how the scheme complies with Part C of Policy D9.

## **Landscape, Public Realm and Trees**

The Applicant has reviewed the public realm, open space, and urban greening provision and calculations following meetings with the LBC. **Annex A** (Open Space Note) **and B** (Urban Greening Factor Note) set out the revised proposals and calculations. These calculations update paragraphs 5.6, 5.48, 10.40 and 10.41 of the TPS.

Camden Local Plan requires 9 sq. m of open space per resident and 0.74 sq. m per employee. Accordingly, the total open space requirement for the Proposed Development would range between 33,252 sq. m to 33,510 sq. m. The Proposed Development provides 22,122 sq. m open space, equating to 66% of the total open space requirement. The Applicant is proposing to make an off-site financial contribution for the difference between the two, which will be secured in a Section 106 Agreement.

The quantum of playspace for the detailed proposals has increased slightly from 2,100 sq. m to 2,130 sq.m to reflect a slight increase in the child yield. The proposals still meet the play space requirements as set out in the London Plan.

In respect of the Urban Greening Factor the project team have had to review fire safety recommendations of BS9991. The design changes required to meet these new recommendations reduced the available areas of roof that could be used for biosolar planting. The proposals now deliver 0.37 provision for the Detailed Proposals with a site wide (masterplan) provision of 0.32. Annex B explains how the figures have been calculated.

The CAVAT Assessment has been revised to respond to GLA comments. This sets out how the value of the trees proposed to be removed shall be retained on site with new planted trees across the masterplan.

### **Transport, Servicing and Waste**

The proposed changes result in a total of 1,064 number of long stay and 80 short stay cycle spaces proposed in relation to the Detailed Proposals. These numbers supersede those in paragraph 5.50 of the TPS. The changes in cycle parking numbers are detailed in the Addendum Transport Assessment.

A Revised Waste Plan is submitted which takes into consideration comments from LBC's environmental team.

### **Other Technical Points**

Through consultation with Thames Water the Applicant has revised the drainage strategy to meet a site wide flow rate of 85.8l/s (3x Greenfield run off rate). This is set out in the Revised Drainage Strategy which forms part of this submission.

This information supersedes paragraph 1.12 (bullet vii part h) and 14.35 of the TPS.

### **Conclusion**

This cover letter and accompanying suite of plans and revised/addendum application documents are submitted formally in relation to planning application ref. 2022/0528/P.

Should you have any questions on the revised submission documentation please contact Leonie Oliva (0207 333 6445) or Luke Davies (0207 333 6402) of this office.

Yours faithfully



**Gerald Eve LLP**

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**Annex A – Open Space**





East

# Finchley Road O2

Open space and landscape  
explanatory note

R03 20/09/2022

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Introduction and policy context

1. Landscape-led Masterplan

2. Public Realm

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- b. Parks and squares
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5. Assessment of open space provision

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The Proposed Development is a landscape led masterplan where play is integrated within the public realm and open space.

This document explains the approach taken to open space provision. It describes the different categories of open space that are proposed across the site and how this relates to the relevant planning policies and standards.



Water play in landscape

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.

Part B(2) of the policy sets out that: “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”.

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”.

The Open Space CPG mirrors the open space requirements set out in Policy A2 and the London Plan standards on play space (10 sq. m per child). The CPG does, however, make an exception by recognising that the 9 sq. m of open space requirement per resident would, reasonably, already include an allowance for play provision and consequently the Council will seek an additional 6.5 sq. m per child (instead of the Mayor’s 10 sq. m per child).



Landscape-led masterplan

# 1. Landscape-led Masterplan

A core principle of the Masterplan is to provide over 50% of the site as public realm.  
 Parameter plan 19066 x (02) P103 shows the proposed development plots and public realm. This indicates the maximum extent of the development plots and therefore the minimum extent of the public realm.

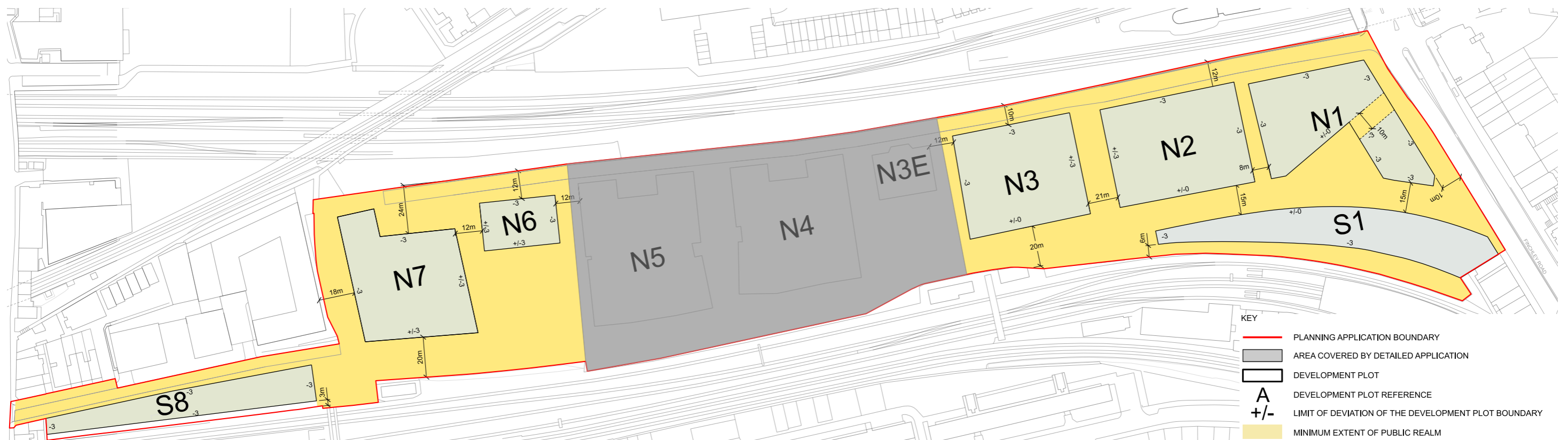
The public realm on the parameter plan extends to **31,813** sq. m equating to **55%** of the total site area.

Application site area (sq.m)	57791	100%
Development plots	25978	45.0%
Public realm	31813	55.0%

The term 'public realm' excludes the podium gardens and roof gardens which are defined as private open space and are located within the development plots.

The public realm is broken down in the different following categories (next page).

Parameter plan 19066 x (02) P103 showing the minimum extent of public realm





## 2. Public realm



Shared surface square in St Leonard's Street



Healthy streets and planted pavements



Playful landscapes



Green linear routes and pathways

The public realm is broken down in different categories which are defined by different characteristics and uses. The landscape-led masterplan has 4 public realm areas :

- Roads
- Shared surface
- Pavements and paths
- Parks and squares (incl. 4 180 sq. m of play)

Roads	5551	(sq.m)
Shared surface	1706	(sq.m)
Pavements and paths	8034	(sq.m)
Parks and squares (incl. of 4180 sqm. of play)	16522	(sq.m)
<b>Total public realm</b>	<b>31813</b>	<b>(sq.m)</b>

**Roads** are defined by any hard surface publicly accessible by any vehicle at any time given and for which this vehicle has priority.

**Shared surface** refers to any predominantly hard surface publicly accessible by any vehicle though for which pedestrians have priority. The shared surfaces proposed in the masterplan are green (incl. rain gardens and planters), offer permeable surfaces (grass cretes) and seating (stone edges to planters and gardens) and the ground treatments are textured and varied.

**Pavements and paths** are publicly accessible routes where pedestrians have priority and motorised vehicles are forbidden. Throughout the masterplan, the pavements and paths are mostly tree planted, offer areas of soft landscape and seasonal low planting with seating and street furnitures.

**Parks and squares** are any publicly accessible landscaped areas offering varied and rich greenery as well as a diverse range of uses for the community. There is **4 180** sq. m of play space integrated in to the parks and squares. If this is deducted, the area of the remaining parks and squares totals **12 342** sq. m .





## 2a. Pavements, paths and shared surfaces



Pavement with breathing space and spill-out sitting areas similar to Finchley square wide access routes

The pavements, paths and shared surfaces in the masterplan have been designed to be green, accessible, inclusive and be multi-use. Some of these spaces have a civic character, consisting of meeting points, seating areas, and public facilities such as cycle parking, benches and public amenity terraces. The design of these spaces is diverse and rich through its palette of colours, textures, materials and variety of planting. They account for a total of **9 740 sq.m.** which is **31%** of the total of public realm.



Artist impression of the entrance mats on Blackburn Road



Example of a planted shared surface with a diversity of uses



## 2b. The parks and squares



Grasses and pathways for a Community Green



Soft landscape and tree bosque in Town Square

The landscape-led Masterplan offers 5 main spaces that fall under the parks and squares public realm category.

Town Square	3100	(sq.m)
Linear Park	6458	(sq.m)
Linear Park East	5387	
Linear park West	1071	
Central Square	1763	(sq.m)
Community Green	3572	(sq.m)
Billy Fury Yard	1629	(sq.m)
Billy Fury Yard North	1289	
Billy Fury Yard South	340	
<b>Total of parks and squares</b>	<b>16522</b>	<b>(sq.m)</b>

These are the following :

**New Town Square** : predominantly hard surface and pedestrian only, the new town square offers a variety of shops and amenities to the community along with some outdoor amenities such as raised landscaped platforms, rain gardens, trees bosques and seating areas for meeting, relaxing, having lunch and others.

**Linear Park** : a tree lined green and naturally landscaped linear route with pockets of greenery for seating and relaxing, some playful equipments amongst denser planting and long vistas.

**Central Square** : offers a mesh of play and community uses amongst a planted green park with permeable pathways and soft edges to buildings.

**Community Green** : Predominantly soft landscape with tall native trees and areas of wild and amenity grass with an emphasis around health and sport uses.

**Billy Fury Yard** : A mixed area between soft and hard landscape, the Yard is an open surface mixing smooth hard pavings with more planted and soft areas with benches and offering some potential for informal play as well.



## 2c. Play space within the parks and squares



Park activities and play



All ages and genders play and leisure areas

The play space proposed throughout the masterplan is fully integrated to the design of the parks and squares and caters for a wide range of users, ages and genders.

The amount of play space located in the parks and squares is **4 180 sq. m.**

When the play space is deducted, the parks and squares measurement is **12 342 sq. m.**

This approach is fully supported by Policy S4 in the London Plan which states that play space should “form a integral part of the surrounding neighbourhood.”





## 2d. Play space character

### Doorstep Play (0-4 yrs old)



This is a landscaped space that includes engaging play features for children under 5 that are close to their homes, and places for carers to sit and talk. It is located within direct access from dwellings and podiums (to promote a sense of security) and designed as a coherent part of the development with effective overlooking and active and passive surveillance. Features will include grass mounds, raised walls, steps, playable sculpture, stepping stones and edible planting. Sensory play and play for the less able children is to be provided.

### Play-on-the-Way and trim trail (all ages)



Areas will create opportunities for incidental play that become an integral part of the landscape along people's daily routes, with or without a carer. The Play-on-the-way will particularly emphasise the presence of the water on site and the playfulness will be integrated to the sustainable drainage features. Areas of trim trail will be found closer to the active edge, along with some train spotting locations.

### Equipped Play (5-11 yrs old)



Play area with age appropriate play features including changes in levels, kick about areas, swings, slides and climbable features. These areas will allow children to develop skills of co-operation, balancing and communication. The play equipment can be natural or colorful depending on the themes of the play area.

### Teenage friendly (11+ yrs old)



Social space appealing to young people that ensures sociable seating, including opportunities for informal skating and other wheeled facilities. Multiple entrances and a proximity to public toilets will make it a safe, open and welcoming environment and ensure this space can be used by all.

Play provision within the masterplan will be integrated in the public realm via a series of spaces predominantly running along the linear park and the active edge provided by the landscape proposal.

Play-on-the-way will feature at regular intervals along the route as to accentuate the East-West connection and a trim trail oriented space will be provided in the detailed phase.

A non-standard MUGA is proposed on the southern edge of the site to allow for organized games within a purpose built space for older children. The MUGA will be further defined later in this document but it is key to ensure that this element is carefully considered and designed to be an open and inclusive space for all.

Along with the more formal play, the podiums steps leading up to the plot N4 and N5 will provide an ideal meeting place to hang out with friends, play cards or have lunch in the sun surrounded by greenery.

The objectives for the scheme:

- To provide a variety of opportunities for play, embedded throughout the scheme
- To provide, through a playable and naturalistic landscape, an opportunity for children to meet and socialise
- To provide appropriate spaces that meet the needs of a range of ages and abilities

These spaces will include both incidental playable space and dedicated and equipped play spaces. Incidental playable space will be less defined and more naturalistic, bending in the landscape and nature such as the 'Play on the way'; some playable forms and platforms; steps and boulders.



## 2d. Play space character



Sand surfacing for 'bring-your-own-game' such as Molki, Petanque and other teenagers+ play



Seating areas and smooth surfaces provided for informal play and hang out areas

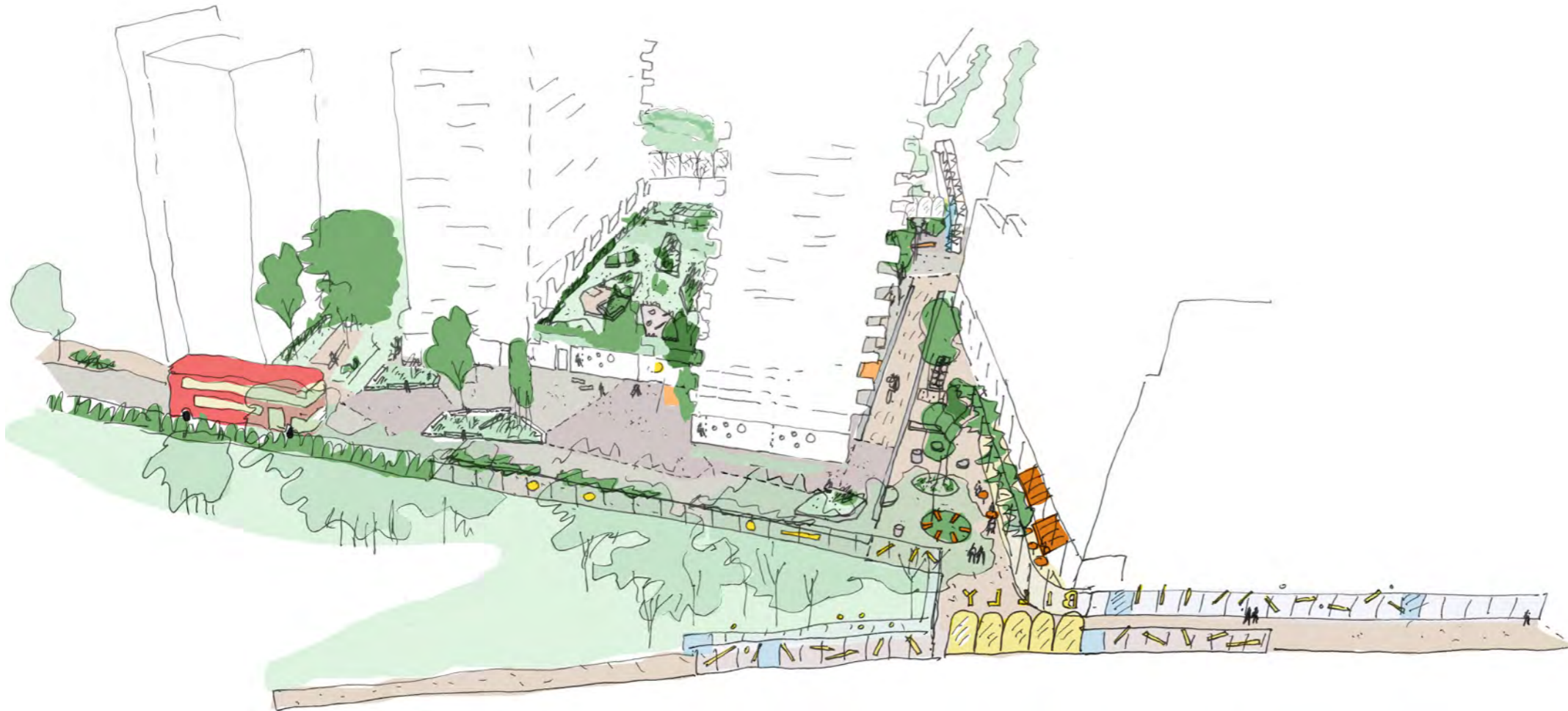


Fixed play furnitures dotted around

Some of the youth play (11+ and 15+) is located by the NIDO on the West end side of the site.

The new space named Billy Fury Yard, is designed to open up the North and South connections and link Billy Fury way and Granny Dripping steps together. The proposal offers long vistas by dint of an unobstructed public space planted with tall mature trees. The new NIDO space will connect the ground floors of the student accommodation and of the new N7 block, offering a new dialogue between both amenity spaces. The areas is well over-looked by both blocks and their uses and will benefit from a thoughtful signage and lighting strategy.

Youth play will be dotted around the space in an informal way, and its detailed design will be informed by the youth engagement workshops we are doing, to make sure that it caters to a wide range of young users.



NIDO's smooth surfaces and opened vistas for youth play and public amenities



### 3. Private open space



Naturalistic play for young children



Informal and overlooked play on podiums



Roof terraces amenities and planting



Roof terraces allotments and food growing facilities

In addition to the public realm, the masterplan includes a range of private spaces to be used by its residents. These spaces are :

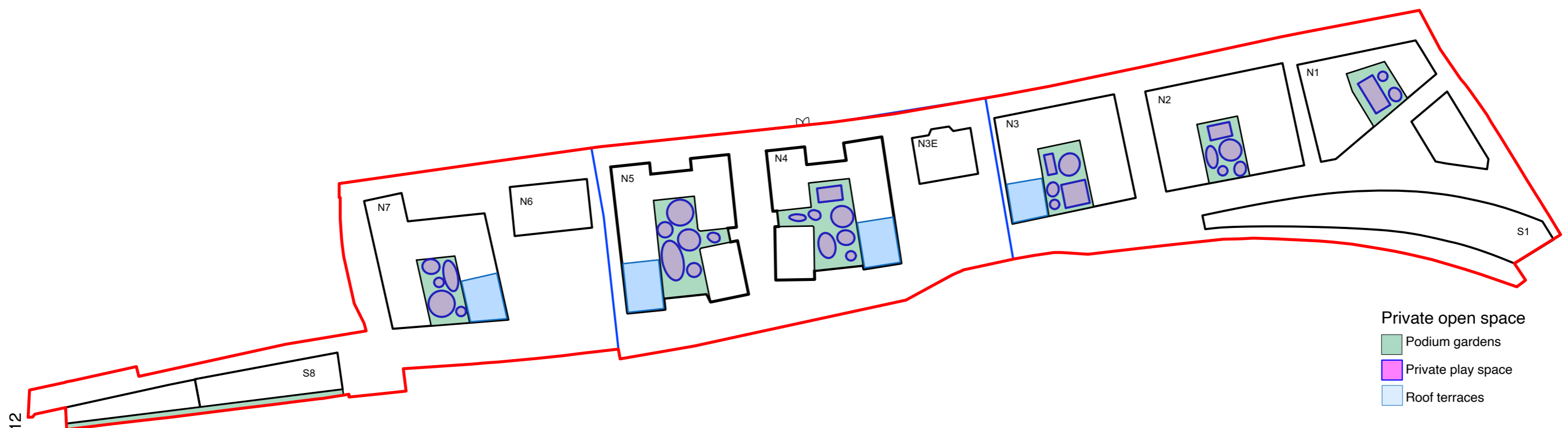
- Podium gardens
- Podium play space
- Roof terraces

In these space we will find areas to sit and relax, landscaped biodiverse areas, doorstep play, food growing allotments and areas to gather.

<b>Podium gardens (incl. of play space)</b>	<b>4930</b>	(sq.m)
Podium gardens (not incl. of play space)	3060	(sq.m)
Podium play space	1870	(sq.m)
<b>Roof terraces</b>	<b>1598</b>	(sq.m)
Detailed plots	802	(sq.m)
Outline plots	796	(sq.m)
<b>Total of private open space</b>	<b>6528</b>	(sq.m)

These private spaces account for **6 528** sq. m of private open space which is available to the residents of each block.

The play space contained in the private open space equates to **1 870** sq. m.





## 4. Assessment of play space provision

The assessment of play space provision set out below is based upon the detailed planning application scheme and the indicative masterplan scheme for the outline part of the application.

Playspace requirements are calculated on the basis of the child yield and the masterplan provides 10 sq. m of play space per child and is compliant with the London Plan.

The tables below indicate the expected Child Yield in the illustrative masterplan (detailed and outline phases) and the play space provisions per age groups distributed across the masterplan.



SuDs and informal water play



Playful greens in the Central Square and Community Green

Age group	GLA child yield		
	DETAILED PHASE	OUTLINE PHASES	ILLUSTRATIVE MASTERPLAN
0 to 4	92	169	261
5 to 11	71	130	201
11 to 15	33	61	93
16+	17	32	49
<b>TOTAL CHILDREN</b>	<b>213</b>	<b>392</b>	<b>605</b>

Play Space Requirement - Detailed Phases				
All ages (sqm.)	0 to 4 yrs old (sqm.)	5 to 11 yrs old (sqm.)	11 to 15 yrs old (sqm.)	16+ yrs old (sqm.)
2130	920	710	330	170

Play Space Requirement - Outline Phases				
All ages (sqm.)	0 to 4 yrs old (sqm.)	5 to 11 yrs old (sqm.)	11 to 15 yrs old (sqm.)	16+ yrs old (sqm.)
3920	1690	1300	610	320

<b>Play Space Requirement Total</b>	<b>6050</b>	<b>2610</b>	<b>2010</b>	<b>940</b>	<b>490</b>
<b>Play Space Provision</b>	<b>6050</b>	<b>2610</b>	<b>2010</b>	<b>940</b>	<b>490</b>

The overall play provision offered is **6 050** sq. m which is in line with the London Plan requirement of 10 sq. m per expected child.





## 4. Assessment of play space provision



Equipped Play (5-11 yrs old)



Play-on-the-Way and trim trail (all ages)

Some of the play space is provided in the public realm (4 180 sq. m). The remainder is located in the podium gardens within the development plots as shown on the diagram below. The podium gardens are classified as private open space. The overall play space provided meets the GLA requirements per age groups as shown in this table below :

	All ages (sqm.)	0 to 4 yrs old (sqm.)	5 to 11 yrs old (sqm.)	11 to 15 yrs old (sqm.)	16+ yrs old (sqm.)
<b>Play Space Requirement Total</b>	<b>6050</b>	<b>2610</b>	<b>2010</b>	<b>940</b>	<b>490</b>
<b>Play Space Provision</b>	<b>6050</b>	<b>2610</b>	<b>2010</b>	<b>940</b>	<b>490</b>

As set out above, playspace has been provided in the public realm and in the private realm with the following breakdown :

Parks and squares play space provision	4180	sqm.	69%
Private podium gardens play space provision	1870	sqm.	31%
<b>Total Illustrative Masterplan Play Provision</b>	<b>6050</b>	<b>sqm.</b>	<b>100%</b>



## 5. Assessment of Open Space provision



Play and seating at the podium steps, overlooking the linear route

The Camden Local Plan requires 9 sqm. of open space per resident and 0.74 sq. m per employee. The Chapter 15 of the Environmental Statement by Plowman Craven shows that the total open space requirement for the masterplan is 33,411 to 33,569 sq. m as shown in the table below :

Open space	Open Space Space Requirement (sqm)		
	Detailed	Outline	Total
Open space demand from residents (9sqm.)	11,228	21,780	33,008
Open space demand from employees (0.74sqm.)	83 to 109	320 to 452	403 to 561
<b>Total in sqm.</b>	<b>11,311 to 11,337</b>	<b>22,100 to 22,232</b>	<b>33,411 to 33,569</b>

As agreed with Officers the Open Space calculation is based on the Parks and Squares including the play space. This is set out in the table below :

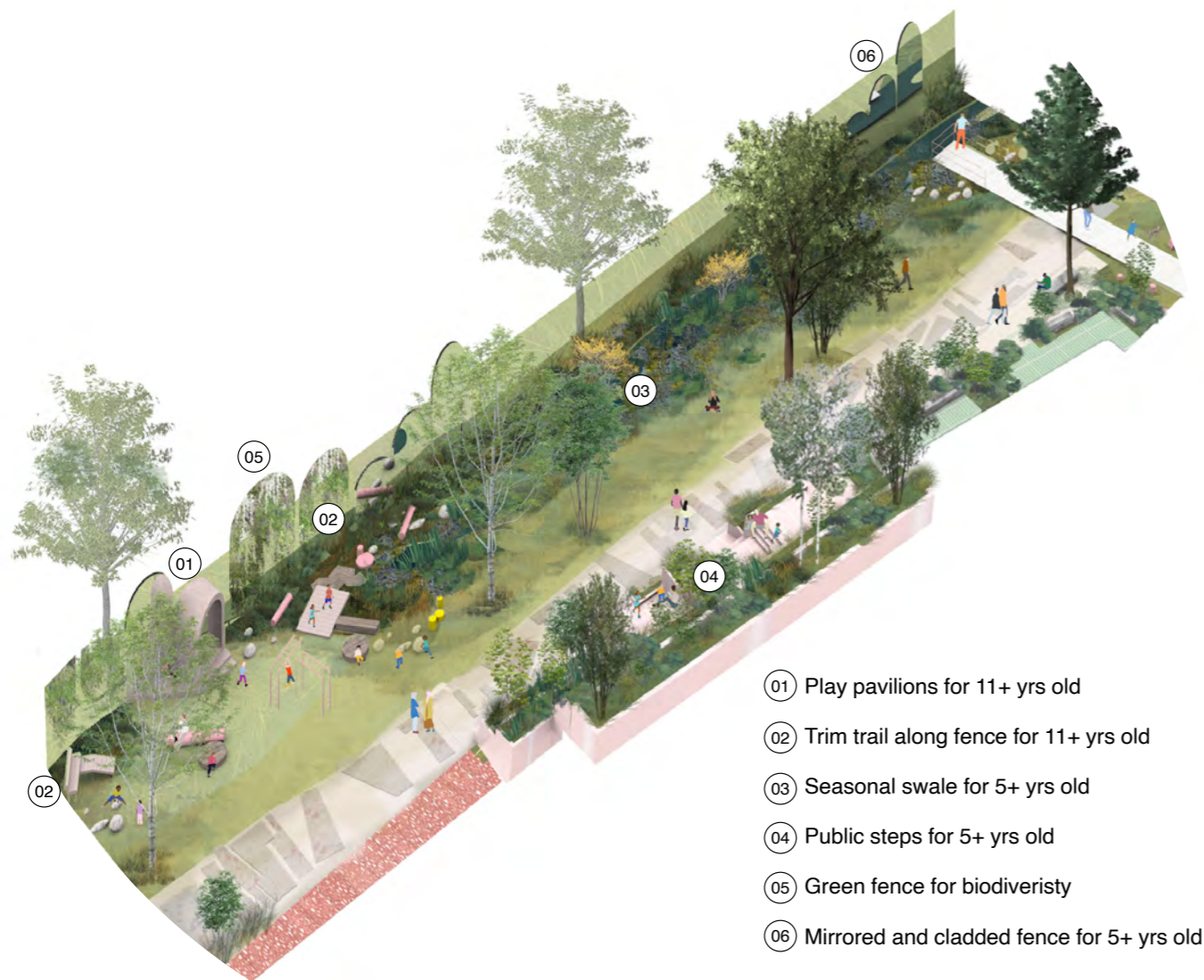
Parks and squares (incl. of 4180 sqm. of play)	16522	(sq.m)
<b>Total open space</b>	<b>16522</b>	<b>(sq.m)</b>

This is less than the Camden Local Plan policy requirement and the applicant is proposing to make a payment under the S.106 agreement to offset this, in accordance with policy A2 of the Local Plan.

With the public play space added in to the open space figure, the adjusted total of **16 522 sq. m** equates to **49%** of the open space policy requirement (33,411 to 33,569 sq. m).







- 01 Play pavilions for 11+ yrs old
- 02 Trim trail along fence for 11+ yrs old
- 03 Seasonal swale for 5+ yrs old
- 04 Public steps for 5+ yrs old
- 05 Green fence for biodiversity
- 06 Mirrored and cladded fence for 5+ yrs old

View of the linear park active edge and landscape

A number of mitigating factors need to be taken into account. These are as follows:

1) Private Open Space and Playspace

- There is a large amount of private open space that is not taken into consideration in the calculations. This provides a significant amount of open space to the residents and takes the pressure off the public open spaces within the masterplan. The private podium gardens equate to **4 930 sq. m** (including play space). There is further private open space at roof level of **1 598 sq. m**.

- The total private open space and play space amounts to **6 528 sq. m**.

2) Additional high-quality public realm throughout the site

- The pavements, paths and shared surfaces in the masterplan have been designed to be green, accessible, inclusive and will be multi-use. Whilst these have not been included in the public open space figure, some of these will have a clear civic character and function, consisting of meeting points, seating areas, and public facilities such as cycle parking, benches, and public amenity terraces;

- The pavements, pathways and shared surfaces amount to **9 740 sqm.**

If the public open space calculation (as set out on page 15 of this document) is added to the pavements, pathways and shared surfaces the total space would be as follows, showing the **26 262 sq. m** which is **79%** of the open space policy requirement :

Shared surface	1706	(sq.m)
Pavements and paths	8034	(sq.m)
Parks and squares (incl. of 4180 sqm. of play)	16522	(sq.m)
<b>Total open space</b>	<b>26262</b>	<b>(sq.m)</b>



- Proposed public open space
- Public open space
  - Parks and squares play space
  - Roads and streets
  - Pavements and paths
  - shared surfaces



The landscape-led masterplan provides **31,813 sq. m** of public realm, equating to **55.1%** of the site area. A significant proportion will be green space. This public realm will deliver a significant benefit to the local environment and community.

Camden's standard for public open space provision for residential development, as set out in Policy A2, is 9 sq. m per resident. The Open Space CPG cross refers to the London Plan play space standard of 10 sq. m per child. However, it notes that "as the 9 sq. m of open space already includes an allowance for any play provision, we will expect an additional 6.5 sq. m of play provision, rather than the 10 sq. m standard" set out in the London Plan. Policy A2 sets out that the Council will give priority to play facilities and the provision of amenity spaces which meet residents' needs where a development creates a need for different types of open space.

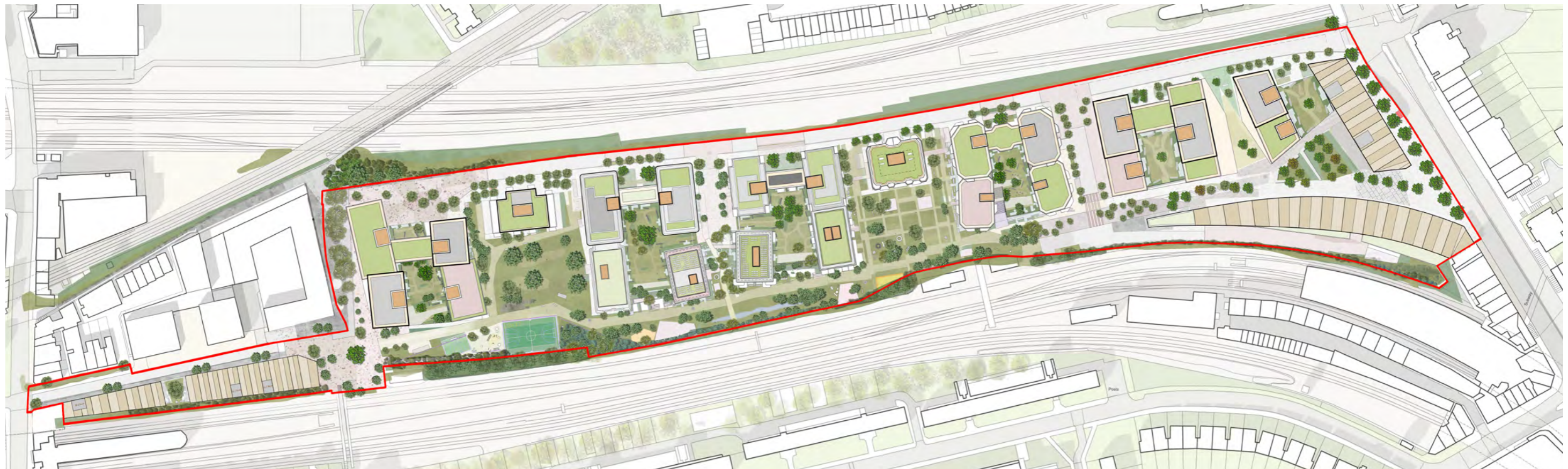
In this case, the masterplan has prioritised the provision of play space, as the aim has been to fully meet the needs of families.

The play space provision has not been adjusted down to the 6.5 sq. m per child standard set out in the CPG.

The amount of public open space including play space (**16,522 sq. m**) is less than the full amount required by Local Plan Policy A2. The masterplan would provide approximately 49% of the total amount of open space required by policy. Therefore, the applicant is proposing to make a payment under the S106 agreement to offset this in accordance with Policy A2.

It is considered that the policy compliant level of play space proposed across the site will help to mitigate the shortfall in public open space, as will the generous amount of private open space provided on site in the podium gardens and roof terraces, as both will take pressure off the public open space.

The paths and pavements have not been included in the **16,522 sq. m** but would provide high quality public spaces that will provide civic value. If these spaces were included in the total open space figure it would result in **26,262 sq. m** which is **79%** of the open space policy requirement.



Landscape-led masterplan

**Thank You**

**Annex B – Urban Greening**





East

# Finchley Road O2

## Urban Greening Factor

### Explanatory note

East

September 2022

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Introduction and policy context

1. From tarmac to park

2. Urban Greening Factor

3. Trees

4. Constraints and justification of scoring



## Introduction

## Purpose of this document



Service road towards West Hampstead



National rail hedge looking towards Finchley road



Carwash in-lieu of the detailed phase 1



Service road along the southern edge

Within the context of the climate emergency and ecological crises it is the aim of this landscape-led masterplan to increase the amount and diversity of vegetation within the development to help mitigate the impacts of heat and stormwater and to provide people with more contact with nature. We believe it provides a significant uplift on the present site condition whilst balancing other policy requirements such as the transition to net zero

## Policy context

London Policy G5 states that developments should aim for an urban greening factor of 0.4.

London Plan Policy G6 sets out that development proposals should aim to secure net biodiversity gain.

Additionally, Policy A3 of Camden Local Plan states that existing features of biodiversity value should be protected and green corridors should be improved. All opportunities to realise benefits for biodiversity should be assessed. The policy also recommends to incorporate additional trees and vegetation wherever possible.

In addition, the London Plan Policy G7 notes to retain existing trees of value and that additional trees to be planted have a preference for large canopies.

This documents responds to the comments from the GLA Stage 1 Letter (para. 128) as listed below:

*'128. The applicant has calculated the UGF of the detailed element as 0.35, and the outline element as 0.32. Both phases are therefore below the 0.4 target. The plans in the DAS are too small to read in detail and clearer drawings and supporting page 27 calculation tables should be provided. It appears that entire plots have been categorised as green walls and no green roofs are included. The applicant should review the extent of proposed urban greening across the masterplan based on the UGF LPG, and improve the quality and quantity of greening and the UGF. Given the comprehensive approach to planting at ground level it is important that the review includes the extent and quality of green roofs. In the event that the 0.4 target cannot be met, robust justification should be provided, setting out fundamental site constraints that cannot be overcome. The final UGF for the outline element must be confirmed at reserved matters and assessed against the 0.4 target.'*

LBC's Nature and conservation comments noted that:

*'The UGF can be increased by either increasing the area of greening, or the quality of the greening. I note that the DAS refers to sedum roofs in places – we don't generally consider these good enough, so changing these to biodiverse roofs with a deeper substrate would help increase the UGF (and biodiversity).'*

The Applicant team have reviewed these comments in collaboration with the London Wildlife Trust and have sought to explore opportunities to increase the UGF in the Detailed and Outline phases where feasible.

This document includes the updated UGF diagrams and scores, demonstrating an uplift resulting from changes to the design of extensive green roofs and an increase in native climbers on walls.



Landscape-led masterplan



# 1. From car park to green park

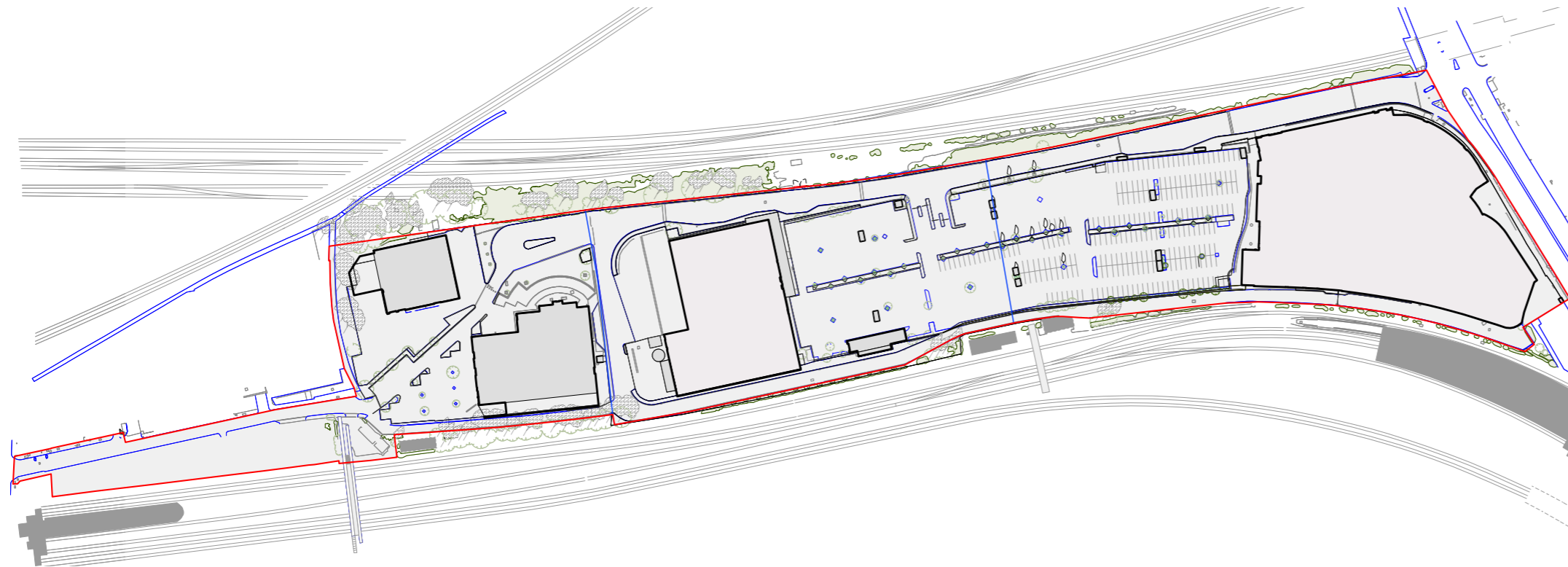
The original illustrative masterplan aimed to achieve an urban greening factor score of **0.32** by providing new extensive green open spaces, including seasonal and flower-rich perennials, planted sustainable drainage systems, additional trees and green walls, replacing the large areas of existing tarmac whilst also delivering 1 800 new homes.

In addition the proposal aimed to achieve a biodiversity net gain of approx. 160% across the site through ecologically-sensitive landscape design.

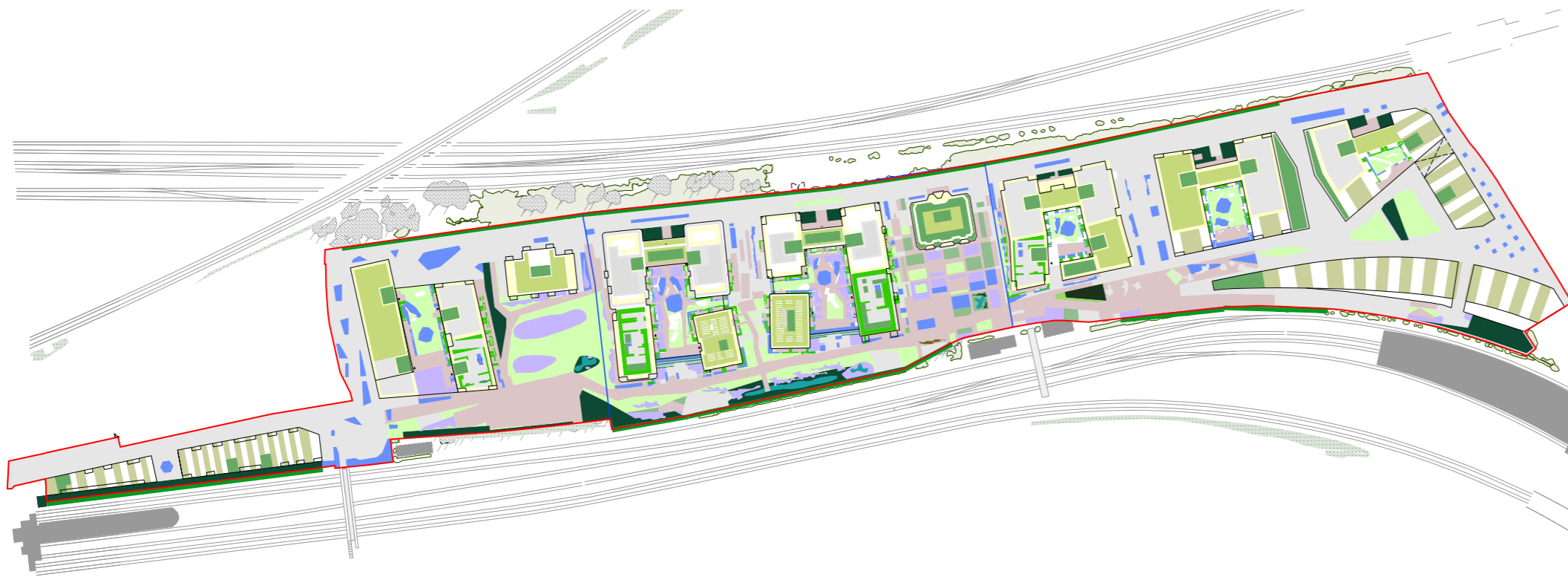
We have worked hand-in-hand with the London Wildlife Trust to ensure that the masterplan offers :

- seasonal planting palette and habitats for a holistic all-year around landscape
- Sustainable drainage across the site
- Seasonal swales
- Non-accessible biodiversity pockets to enhance ecological habitats
- Native hedges and green walls
- Inclusion of run-over grass cretes, permeable grids, wild grass as well as wildflowers

Illustrative masterplan UGF : **0.32**



Existing site plan 2022



Proposed urban greening factor diagram

## Biodiverse planting:

Ground cover planting	0.5
Green wall	0.6
Hedges	0.6
Flower rich perennial	0.7
Rain gardens	0.7
Semi natural vegetation	1.0
Water habitats	1.0

## Typical surfaces:

Sealed surfaces	
Permeable surfaces	0.1
Amenity grass	0.4

## Roofs:

Extensive sedum roof	0.3
Extensive green roof	0.7
Intensive green roof	0.8

## 2. Urban Greening Factor - Phase 1

As part of this review, our main actions have been to increase the amount of native climbers on walls along both railway corridors, taking the number from 400 sq. m to over 810 sq. m and to change our extensive roof of sedum to extensive biodiverse solar roofs where possible. With these updates in areas, the detailed phase Urban Greening Factor is now of = **0.37**

### Biodiverse planting:

Ground cover planting	0.5
Green wall	0.6
Hedges	0.6
Flower rich perennial	0.7
Rain gardens	0.7
Semi natural vegetation	1.0
Water habitats	1.0

### Typical surfaces:

Sealed surfaces	
Permeable surfaces	0.1
Amenity grass	0.4

### Roofs:

Extensive sedum roof	0.3
Extensive green roof	0.7
Intensive green roof	0.8



	Surface cover type	Factor	Area (sq. m.)	Score
D E T A I L E D	Semi-natural vegetation	1.0	654	654
	Wetland or open water	1.0	127	127
	Standard trees in soil or connected tree pits	0.8	1522	1217.60
	Intensive green roof or vegetation over structure	0.8	713	570.4
	Extensive green roof	0.7	854	597.8
	Flower-rich perennial planting	0.7	1018	712.6
	Rain gardens or vegetated SUDS	0.7	785	549.5
	Hedges	0.6	644	386.4
	Standard trees in pits	0.6	200	120
	Green wall	0.6	900	540
	Groundcover planting	0.5	378	189
	Amenity grassland	0.4	1515	606
	Extensive green roof of sedum	0.3	0	0
	Water features	0.2	0	0
	Permeable paving	0.1	3995	399.5
	Sealed surfaces	0	0	0
		<b>TOTAL AREA</b>		<b>13305</b>

SITE TOTAL 17935

DETAILED UGF SCORE 0.37

Proposed urban greening factor diagram for the detailed phase 1

## 2. Urban Greening Factor - Outline Phases

As part of this review, our main actions have been to increase the amount of native climbers on walls along both railway corridors, taking the number from 50 sq. m to over 600 sq. m and to change our extensive green roof of sedum to extensive biodiverse solar roofs where possible. With these updates in areas, the outline phase Urban Greening Factor is now of = **0.30**

Biodiverse planting:	
Ground cover planting	0.5
Green wall	0.6
Hedges	0.6
Flower rich perennial	0.7
Rain gardens	0.7
Semi natural vegetation	1.0
Water habitats	1.0

Typical surfaces:	
Sealed surfaces	
Permeable surfaces	0.1
Amenity grass	0.4

Roofs:	
Extensive sedum roof	0.3
Extensive green roof	0.7
Intensive green roof	0.8



	Surface cover type	Factor	Area (sq. m.)	Score
O U T L I N E	Semi-natural vegetation	1.0	1660	1660
	Wetland or open water	1.0	30	30
	Standard trees in soil or connected tree pits	0.8	2553	2042.40
	Intensive green roof or vegetation over structure	0.8	1355	1084
	Extensive green roof	0.7	2327	1628.9
	Flower-rich perennial planting	0.7	748	523.6
	Rain gardens or vegetated SUDS	0.7	1410	987
	Hedges	0.6	355	213
	Standard trees in pits	0.6	1344	806.4
	Green wall	0.6	1000	600
	Groundcover planting	0.5	40	20
	Amenity grassland	0.4	2678	1071.2
	Extensive green roof of sedum	0.3	2807	842.1
	Water features	0.2	0	0
	Permeable paving	0.1	4266	426.6
	Sealed surfaces	0	0	0
<b>TOTAL AREA</b>			<b>22573</b>	<b>11935.2</b>

**SITE TOTAL** 39880

**OUTLINE UGF SCORE** 0.30

Proposed urban greening factor diagram for the outline phases



## 2. Urban Greening Factor

Examples of landscape interventions across the proposed masterplan, classified as per the Urban Greening Factor scoring chart and their corresponding score.



Permeable surface 0.1



Green walls (with native climbers) 0.6



Extensive green roof (Biosolar roof) 0.7



Grass cretes 0.3



Hedges 0.6



Intensive green roof over structure 0.8



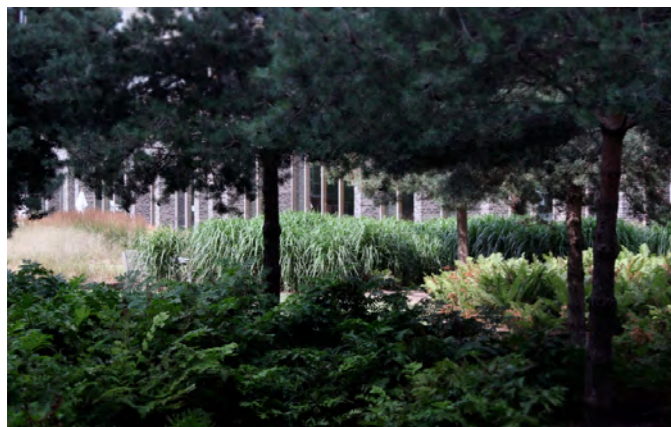
Amenity grass 0.3



Rain gardens or SUDS 0.7



Wetland 1.0



Groundcover planting 0.5



Flower-rich perennials 0.7

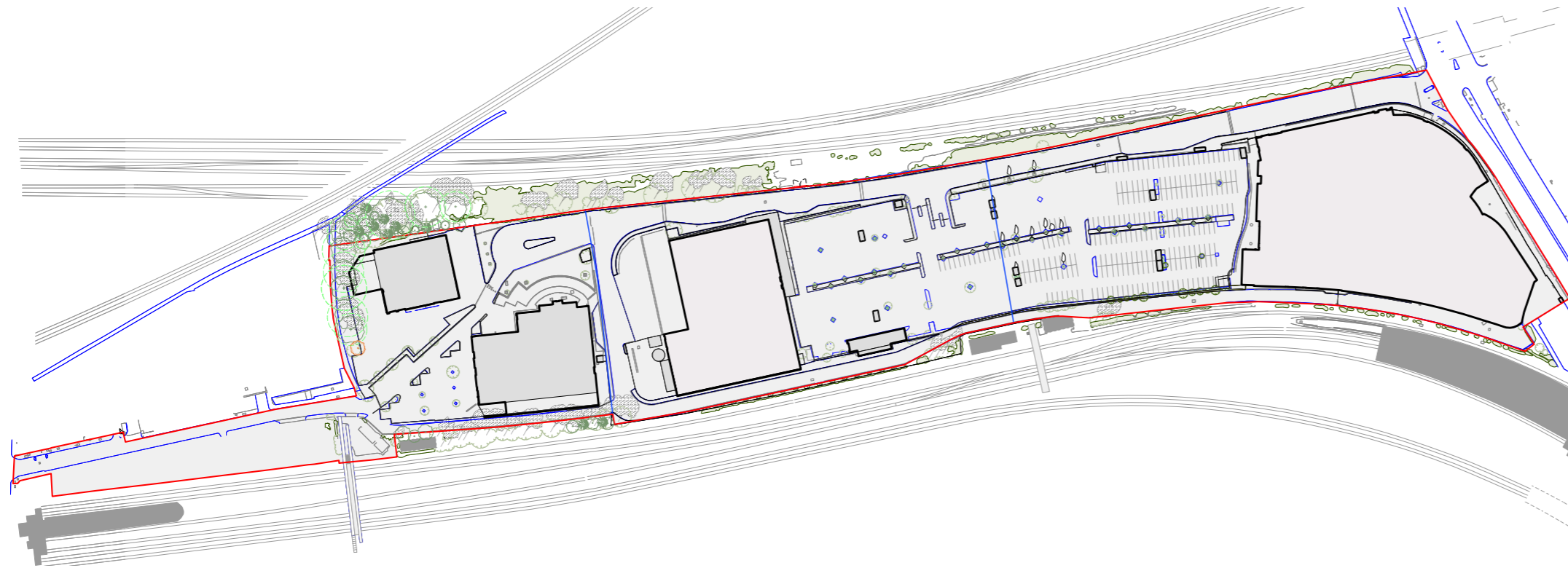


Semi-natural vegetation 1.0



### 3. Trees

The proposal aims to retain the existing trees of significance along Billy Fury Way and will propose over 100 new trees to be planted across the masterplan. These will be rich and varied in sizes, shapes, colours and scents. Whenever possible, trees are planted in soil or interconnected pits to enhance their ecological value. The bottom of the trees is also planted and made permeable.



Existing tree survey 2021

- Tree planting:
- Trees in natural soil or connected tree pits 0.8
  - Trees in pits 0.6



Proposed tree plan



## 4. Justification of UGF scores

The landscape-led masterplan is striking the careful balance at providing a landscape that can be used by all, be playful by offering some areas where one can sit, rest and relax, and avoid any conflict of users. This may result in some areas offering amenity grass for which the scoring is quite low.

Other environmental factors constrain the areas for Urban Greening Factor. For example, the design for the roofs in particular, which is trying to optimise the need for greening and the need for net zero energy (Pvs and air source heat pump) and both requirements are competing for the same space.

Since the upcoming change in fire regulations, the design team and the client have decided to update the designs to the latest requirements and therefore less roof area will be available for extensive green roofs to the benefit of safer pressurised cores.

On the other hand, through our partnership with the London Wildlife Trust we have designed non-accessible biodiverse areas, where we hope to create resilient and thriving habitats.

We are hoping to continue to develop the landscape planting palette emphasizing native, rich and diverse species, that are well connected together, conscious that such opportunity for ecology must not be missed.

The landscape designs at O2 will be strengthened by this organic approach where designs are simple and mimic the natural settlement of fauna and flora and benefit from how habitats would evolve and develop in a natural state. Prioritising the use of organic maintenance methods and cut back on lawns will increase the ecology of the site.

The proposal will ensure that the ecological corridors are continued and enhanced, not forgetting to provide wildlife corridors and connections with the other green spaces of the site. The development aims to offer a 'green route' with habitat that is structured and connected to allow for the movement of both wildlife and people through the development.



Relationship between the different uses and nature along the linear route



Impression of the proposed ecological corridors and planted fence



Landscape-led masterplan



**Thank You**

**Annex C – Table of Proposed Floorspace GIA (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	• 5,674	• 23,810	• 27,262	• 56,746
• Community	• F2	• 0	• 268	• 0	• 268
• Retail	• E (a)	• 137	• 91	• 1,073	• 1,301
• Food and drink	• E (b)	• 92	• 0	• 0	• 92
• Professional Services	• E (c)	• 0	• 161	• 0	• 161
• Sub station	•	• Included in Resi GIA			
• <b>Total</b>	•	• 5,903	• 24,330	• 28,335	• 58,568
• Includes all built floorspace – plant, podium car parking, BOH etc			•		



**Annex D – Residential Unit Mix (Detailed Proposals)**

• Type of Housing	• Private	• Low - Cost Rent	• Intermediate Rent
• Studio	• 61 (15%)	• 0	• 0
• 1 bedroom	• 155 (37%)	• 14 (13%)	• 37 (44%)
		•	
• 2 bedroom	• 184 (44%)	• 39 (36%)	• 36 (42%)
		•	
• 3 bedroom	• 16 (4%)	• 54 (50%)	• 12 (14%)
		•	
• Total	• 416	• 107	• 85

## Annex E – London Plan Policy D9 (C) Tall Building Assessment

The Proposed Development proposes buildings which can be defined as tall buildings and has undergone two Design Review Panels [6 November 2020 and 2 July 2021]. Generally, the response was positive. It is therefore considered that the Proposed Development complies with the aims of Policy D4 which seek to achieve good growth across London and Policy D4(D) which requires major developments to have undergone at least one design review.

London Plan (2021) Policy D9 requires boroughs to define [in future] Development Plans what they consider to be a tall building for specific locations and identify suitable locations for tall buildings. Where they do not have such allocations, proposals should be judged against the other criteria in the Policy<sup>5</sup>. The principle of the Site as an appropriate location for a tall building has therefore been considered against the criteria framework of Policy D9 (C).

Part C of Policy D9 sets out the 1) Visual, 2) Functional and 3) Environmental criteria against which tall buildings should be assessed.

### 1) Visual

The Townscape and Visual Impact Assessment (“TVIA”) assesses the proposals in a range of views from intermediate to long range.

#### *Long-range Views*

The long-range views, both strategic and local, are minimally impacted by the proposals. Where the impact is assessed as moderate in the views in the TVIA this typically focuses on taller elements of the proposals that help to signify significant new public spaces and locations to be enjoyed by the wider community, therefore making a positive impact on the local skyline.

#### *Mid-range Views*

The mid-range views are largely unaffected by the scale of the development. The areas where the massing of the development has a greater impact are typically located outside of the Conservation Areas and the proportions of the buildings have been carefully considered to mitigate their impact. The requirements of mid-range views to consider materiality has been considered and details of the requirements for the outline plots is covered in the Design Codes. However, to help illustrate the outline proposals further additional rendered views have been provided to show how these plots could be developed and contribute to a positive impact.

#### *Immediate Views*

The TVIA identifies four immediate views; none of which sit within a conservation area. The TVIA describes the impact on the views as major in scale and neutral in nature given the previous open expanse of car parking and low-rise buildings.

### Criterion B

Criterion b) relates to spatial hierarchy. The Proposed Development has been designed to have a clear and legible hierarchy of spaces and buildings reflecting the proposed land uses in that location, be it commercial or residential, and also allowing for optimal connections and views across the Site.

The position of taller buildings has been considered to ensure any visibility aids wayfinding or helps to reinforce the existing spatial hierarchies through an absence of visible height. The tallest parts of the masterplan are located close to Finchley Road where they are best connected to the excellent transport links of tube and buses.

The taller buildings also sit within the heart of the Town Centre area, which has been enhanced through the provision of public space and better inclusive design of levels.

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<sup>5</sup> R (London Borough of Hillingdon) v Mayor of London (Lang J, 15 December 2021)



The approach to massing and layout has created a logical and familiar series of streets. The approach to lower massing on the main pedestrian thoroughfares and public spaces further reinforces the predominance of the pedestrian by locating taller buildings away from these areas. The elements at the edges of the masterplan are kept deliberately lower in order to sit comfortably in the local setting.

### **Criterion C**

Criterion c) requires architectural quality and materials of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained throughout its lifespan.

The Design and Access Statement details the architectural approach to the buildings forming part of the Detailed Proposals, drawing on the rich historical setting, key physical characteristics and quality, and appropriateness of materials. This has helped to set clear guidelines for future applications for the Outline Proposals, which have been distilled into Design Codes to control the quality of architectural approach. The Design and Access Statement contains examples of how plots in the eastern and western phases could be developed in accordance with the Design Codes for illustrative purposes.

### **Criterion D**

Criterion d) requires proposals to take account of, and avoid harm to, the significance of London's heritage assets and their settings. Careful consideration has been given to the heights of the proposed buildings and care has been taken with respect of impact on nearby Conservation Areas, listed buildings and local views and context.

The analysis of View 19 in the TVIA, which examines the impact of the proposals on the setting of St Pauls, details the reasons why the impact of the view is negligible, of minor scale, and neutral in nature.

### **Criterion E**

Criterion e) is not relevant as it relates to proposals affecting World Heritage Sites.

### **Criterion F**

Criterion f) relates to buildings within the setting of the River Thames and is therefore not relevant.

### **Criterion G**

Criterion g) relates to solar glare. The materials proposed do not give rise to reflective solar glare, due to their predominant solidity. Further information on this is covered in Appendix 12.15 of the Environmental Statement. The Development has been designed to minimise light pollution from internal and external lighting having regard to safety and security through the Site.

## **2) Functional**

All of the functional impacts of the scheme have been considered and are summarised below:

- a) The safety of not only the occupants of the buildings, but also those passing through the development and using the services on the Site, has been considered. There are no outstanding objections in terms of safety and security.
- b) How the buildings function and their impact upon the public realm has been considered by the applicant team from the outset. The proposals are for a landscape led masterplan and therefore the buildings have been designed to complement the spaces around them.
- c) Routes through the Site and access to buildings have been designed to stitch two communities together, providing a direct route through the Site and aiding better public transport connections.

- d) The Environmental Statement demonstrates that the capacity of the area and its transport network is capable of accommodating the quantum of development proposed in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the buildings;
- e) The proposals will result in significant economic benefit to the local area. This has been considered in design of the building to ensure that the benefits are maximised; and
- f) The proposals will not interfere with aviation, navigation or telecommunication, and avoid a significant detrimental effect on solar energy generation on adjoining buildings.

### **3) Environmental Impact**

The environmental impacts have been thoroughly assessed in the Environmental Statement supporting the application. This includes assessments on bullets a-c of part 3.

### **4) Cumulative Impacts**

The cumulative impacts of the tall buildings have been thoroughly assessed within the Environmental Statement supporting the application.