

David Fowler
Regeneration and Planning Department
London Borough of Camden
Judd Street
London
WC1H 9JE

Dear Mr Fowler,

Re: O2 Centre Planning application (2022/0528/P)

I am writing on behalf of West (Fortune Green and West Hampstead) Branch of the Hampstead and Kilburn Labour Party to comment on the revised application for this site. Our comments are the outcome of a branch working party and have been approved by branch officers.

1. Timing

The lack of clarity on the timing of the community benefit sections of the development plan remains a major problem. There is still no news as to whether Landsec can acquire the VW/Audi garages and the Builders Depot for phase 2. All of these businesses have objected to the scheme. The key issue for the outline planning permission for phase 2 of the scheme (other than loss of employment) is that there appears to be no agreement or way forward by which Landsec can acquire this land. Without this land, the whole scheme is degraded.

This application fails to consider the possibility that only phase 1 gets built or that there is a long interval between phase 1 and completion of the later stages. This would leave the phase 1 blocks isolated from West Hampstead by the garages, only accessible via an insecure footpath and a narrow pavement in Blackburn Road. There is a risk that the West Hampstead entrance to the site will remain as big an eyesore as it is currently.

The benefits in the phase 2 scheme green playing space and health facility - would be lost. Access to Finchley Road and its station would be via a steep and narrow roadway or via escalators in the shopping centre when open, and then via a narrow and congested stretch of pavement.

Yet the planning applications talks as if this acquisition is a done deal. It is legal to apply for planning permission for land you do not own but surely there must be some evidence presented that there is a means by which it could be acquired.

We would therefore urge that if planning permission is granted, it must be a condition that phase 2 is built first. As things stand the application paints a rosy picture of the development as a whole without considering the impact of project staging.

2. Community benefit

The following issues need to be addressed with urgency. More than a year has passed since the public were able to question Landsec about the progress of these issues:

- i. *Step free access to the tube stations at each end of the development.*

Essential for modern travel in any event, it must be a priority for this development of 1800 new homes, planned without parking on the back of the proximity of its amazing travel connections – including two TfL tube stations, Finchley Road and West Hampstead. The development also includes 10 per cent of homes with wheelchair access.

As yet there is no information available on the progress or even existence of negotiations between Landsec, Camden and TfL. There is an urgent need for transparent negotiations between these three organisations.

- ii. *Pedestrian access generally to both tube stations and bus stops.*
Access to public transport cannot be left to the last minute. The Greater London Authority (GLA) estimates there will be 220 extra tube passengers and 136 extra bus journeys during rush hours. As well as ensuring that these transport systems will hold up (at a time of cuts in bus services), it's essential to ensure easy access from within the development, thus avoiding the congestion that is a daily problem on Finchley Road and West End Lane.

It would be relatively easy to access the Finchley Rd tube via the development from the Sainsburys delivery area beside the O2 building as there is a gap between the Finchley Road station building and the housing beside it.

A solution to providing step free access must be found for West Hampstead, probably involving demolition of the small shops on the north side of the tube station which are on TfL land. If these areas are not incorporated then Blackburn Road, the West Hampstead entrance to the site, will remain as big an eyesore as it is currently.

As GLA noted, there is also a need to consider how cyclists and pedestrians can safely access southbound and northbound Finchley Road. The traffic lights at the junction of the existing O2 access road and Finchley Road are dangerous and complex for pedestrians.

To ensure that this car-free development does not cause safety issues, Landsec must be crystal clear from the get go, that it is

reserving any land that is needed for safe access to tube and bus journeys for new residents and local people generally.

iii. NHS and community centre

There appears to be no news on either of these developments. What is happening about the negotiations we were told a year ago were happening with the NHS? This area is deficient in health facilities and the growing population will add to the strain on resources. As things stand the health facility is in phase 2, which may never be built.

Likewise, the development will mean that the community space in the O2 centre is lost, but we have no information on what will replace it and how it will be managed.

iv Green Space

The application is still deficient in green space – and there is concern that Landsec might offer a financial settlement to Camden Council in mitigation of the failure to meet the council's requirements on green space. This would be abhorrent. West Hampstead and Fortune Green wards are among the most deficient in open space in the borough. There is really not enough space for children to run around and play-not enough grass, no playground. This is especially true of phase 1, which will have a social rent/low rent housing element.

3.Mix of tenure and size

It's noted - and to be welcomed - that Landsec have increased the number of affordable homes by 4. This means that there will be 107 low rent flats out of a total of 608 in phase 1.

Landsec may defend such a small increase by pointing to the demands on its purse for funding community benefits, notably in step free and general access to tube stations. Yet that defense hardly stands when there is as yet no progress in discussions on Landsec's contribution to step free and improved access to Finchley Road and West End Lane tube stations. This just seems to be an excuse when there is no progress on the land acquisition needed for phase 2.

We make the point above that phase 1 may be built in isolation or with a long interval before the other phases. This would leave just 107 low rent flats in the development. Is it worth imposing such a massive and overbearing development on our area for the sake of such a small number of (albeit very badly needed) low rent homes?

4. Density and height of the development

The GLA has given lukewarm approval to the density and height of the development despite local concerns about its visual impact. We are concerned about the height of the development. There is as yet no sign in this application that local concerns about height and density are being balanced by the provision of community benefits as outlined here.

Attention should perhaps be focused on the amount of light reaching individual homes including the number of single aspect units, ensuring – as the GLA has suggested – that none are north-facing. The development is also out of keeping in size and style with the late nineteenth and early twentieth century character of the surrounding area and adjacent Conservation Areas.

5. Retail

The issue of a low cost supermarket on the site should be kept in focus. This redevelopment is a long way down the road at a time when patterns of shopping are changing.

We therefore conclude that the Planning Committee should reject the application in its current form. It should recommend to the developer that phase 2 should be built before phase 1 of this application given the many uncertainties that its benefits will otherwise ever happen.

Yours faithfully,

Virginia Berridge

Vice Chair, West (Fortune Green and West Hampstead) Branch, Hampstead and Kilburn CLP and chair of the O2 working party.