From: PETER EISNER

Sent: 05 April 2022 21:46

To: David Fowler

Subject: You know this is not right

There's already been massive new flat development within about a mile of the 02.

Almost no one locally wants it other than a few odd balls

If Camden/you push this through against peoples wishes there will be repercussions for Camden Council as well as us.

We are well aware that this is a joint project with Landsec!

It's not needed

The 02 /Sainsburys with its car park/ car wash is needed and required

So that's a summary of the reason *that*

. I am objecting to this outrageous development on the following basis:

- Height, mass and form contravene national guidance
- Overshadowing contravenes the Right to Light act
- Layout and density contravene the London Plan policy
- Design conflicts with Camden's Climate Change and Clean Air Action Plan
- Proposed scheme will swamp (literally) local Infrastructure, Utilities and Community Assets
- Impact on Conservation Areas and Heritage Assets
- Politically motivated elimination of private transport

Overbearing height, mass and form

The National Model Design Code advises building heights of 3-4 storeys and densities of 60-120 dwellings per hectare for an urban neighbourhood site such as O2. Landsec is proposing 18 towers of 8-11 and 11 towers of 12-16 stories to give 312dph which 3-5 times recommended density. This is 'super density' development and not surprisingly, the site has not been classified to avoid this embarrassing challenge.

Camden's Local Plan policy A2 requires a minimum open space of 9m2 per occupant, implying an open space of 40-45,000 m2. Landsec's proposal totals 15,500m2 which is just one quarter of Camden's own policy requirement in an area that is officially green-space deprived.

Overshadowing and Loss of light to neighbours Skylight, sometimes known as diffuse skylight, is diffused all around us even on cloudy days, whilst sunlight is the light which comes directly from the sun on clear days. BRE define daylight as a combination of skylight and sunlight, adding, "The quantity and quality of

daylight inside a room will be impaired if obstructing buildings are large in relation to their distance away". In a British context, skylight is the more important component. A loss of view is not a valid planning objection but the 'right to light 'of nearby neighbours to the north of this scheme is protected by the Rights to Light Act 1959.

Layout and density of building

A 'tall building' is defined as anything higher than 10 storeys. This development should be limited to 10 storeys under London Plan policy D9. The area is unsuitable for high rise buildings and the primary benefits of this 'new neighbourhood' of sub-standard architecture – more in keeping with an office than a residential setting- will go to the developer, Landsec and Camden Council, not to the community.

Suzanne H. Crowhurst Lennard, co-founder and director of the Making Cities Liveable International Council says, "the construction industry is a powerful engine for fuelling economic development. Tall buildings offer increased profits for developers. However, the higher a building rises, the more expensive is the construction. Thus, the tallest buildings tend to be luxury units, often for global investors. Tall buildings inflate the price of adjacent land, thus making the protection of historic buildings and affordable housing less achievable. In this way, they increase inequality."

The density is abnormally high and significantly exceeds the London Plan Density Matrix even for a site of PTAL 6. Camden, a borough which has produced some of the highest quality homes in the last 50 years, is said in a report that went to cabinet in early March, to have co-designed this insensitive housing environment.

In conflict with Camden's Climate Change and Clean Air Action Plan There are sound reasons not to demolish the O2 Centre. In the words of a Camden Council Planning officer: 'Land Sec will need to demonstrate that the redevelopment of the O2 centre is more sustainable than refurbishing the building. To do this they will need to submit a whole life carbon assessment'. The embodied carbon as energy consumed in manufacturing, delivering and installing the materials to build, and fit-out these buildings over a planned 15-year construction and their disposal at end of life as well as operational carbon associated with electricity, gas and other fuels used for heating, cooling, ventilation, lighting, hot water, and other electrical equipment must be accounted for.

Construction also has a significant and negative impact on local air quality and potentially public health if it is not carefully managed. Construction activity is responsible for 4% of NO2 emissions, 24% of PM10 emissions and 9% of

PM2.5 emissions in Camden.

Increases Pressure on Infrastructure, Utilities and Community Assets Where is the significant and long overdue increase in medical resources in West Hampstead to reflect the needs of 5000+ new users? NHS England published guidance in February 2018, requiring extended access to GP services, including at evenings and weekends, for 100% of the population by 1 October 2018. Access to basic health and dental care for local residents has diminished not increased.

The area will face more overcrowded pavements, roads, transport and the loss of all the amenity of the O2 centre, including a large supermarket with 550 parking spaces – none of which can be effectively replicated in this scheme. Without any parking, no large format store to replace the current Sainsbury's can be viable.

Impact on Conservation Areas and Heritage Assets The O2 site is bordered by five conservation areas:

- South Hampstead
- West End Green
- Fitzjohns/Netherhall
- Redington/Frognal
- Belsize

In point 3.2.2 of the FG&WH Neighbourhood Plan it states: 'The height of new buildings shall have regard to conservation and respect the proportion, scale, massing and rooflines of existing buildings in their vicinity and setting. In all development there shall be a clear presumption in favour of preserving the distinct character and appearance of the Area, as well as the views across it.' In observations, posted on the O2 planning application, Historic England comments: 'The buildings 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 is a harmful impact to designated heritage assets through development within their setting.'

The O2 site is surrounded by 29 listed buildings and 5 conservation areas. Their settings will be blighted by the intrusion of towers blocks and is contrary to National Planning Policy Framework, Planning Practice Guidance and Good Practice Advise by Historic England.

Politically motivated elimination of private transport

The scheme objective that "The impacts of car parking should be designed out"

reveals a socialist utopian ambition to eliminate private transport. The intended outcome is for all 'citizens' to become wholly dependent upon state provided transport (TfL!) and have no alternative (except walking or cycling). Under UK net-zero plans, all Internal Combustion Engine vehicles will be banned from 2030. However, Electric Vehicles will rightly not be banned. Eliminating private transport in Camden is politically motivated and denies residents their legal rights to private transport. This will also impact Camden and London's economic and labour market flexibility and overall will reduce growth and impact employment in Camden.

SIGNED RESIDENT OF 28 years

Peter EISNER NW6 3HS From: Tony and Colette Sent: 05 April 2022 17:23

To: David Fowler

Subject: Objection to plans for re-development O2 centre

Reference number 2022/0528/P

Dear Mr. Fowler,

As a Camden resident and frequent user of the O2 Centre, I wish to object to the plans for redevelopment in the strongest terms, on the following grounds:

The plan is set up to favour the greed of developers, not in consideration of residents in adjacent areas or users of the useful shops and amenities in the O2 Centre

The O2 Centre fulfils an essential function for shoppers at both the O2 Centre and Homebase. Furthermore, Transport for London has recently designated the red route along Finchley Road as applying at all times on a permanent basis, rather than just within controlled hours, as had been the case before 2020. This has put greater importance on the car park for shoppers at commercial premises other than the redevelopment site. the loss of car parking should therefore be resisted.

The loss of a large car park will have a particularly harmful effect on the sustainability and viability of amenities. The large supermarket currently provided by Sainsbury's is an important destination for shoppers across north-west Camden, being the largest supermarket in the area. In the absence of being able to park at the site, Sainsbury's have been clear that they do not intend to take on a large store, so shoppers from miles around would lose out.

This makes the commitment to provide a supermarket meaningless, as there is both a quantitative and qualitative difference between large and small supermarkets. For example, smaller branded supermarkets are permitted to charge higher prices than larger supermarkets of the same brand (which costs up to £320 extra a year for the same products). Furthermore, the failure to provide a large supermarket or DIY merchant on site would lead necessarily to trips

being made by Camden residents to Brent Cross or similar locations: increasing, rather than reducing, traffic and climate change impact.

The loss of parking therefore will lead necessarily to harm to the town centre, make the amenities provided for in the outline permission unviable, and harm mitigation and prevention of climate change, and thus should be refused.

The height of the proposed building is out of keeping with others in the area. A common theme in the feedback to Camden's recent consultation on its Site Allocations Local Plan is that the area is not suited to high-rise buildings. Furthermore, a recurring theme was that in the local area, 10 storeys is considered the maximum height for a building in the area.

This public view is in-keeping with the tallest buildings in the area:

- The 11-storey Lessing building is the tallest building in West Hampstead ward.
- The 12-storey Ellerton tower is the tallest building in the Fortune Green & West Hampstead Neighbourhood Plan Area.

This development contains several buildings that are taller than either of these. It is therefore extraordinarily tall compared to the surrounding area.

As a result, while Camden has been derelict in not designating areas as suitable or not, the factors specified in the London Plan would lead an objective observer to conclude that the area is not suitable to tall buildings and that a 'tall building' is defined as anything taller than 10 storeys. As a result, the development should be limited to 10 storeys under London Plan policy D9. As it is not, it should be refused.

The development is sandwiched tightly between the Fitzjohns & Netherhall, Belsize, South Hampstead, and West End Green Conservation Areas. In these areas buildings are are low- and medium-rise, with the most typical building being three storeys above ground with a lower ground floor, or primarily red- or yellow-brick terraces and mansion blocks. Unrendered brick is the absolutely dominate material in the conservation area, and materials used are traditional in nature. Furthermore, while it is not located within a Conservation Area, is it located in the Fortune Green & West

Hampstead Neighbourhood Plan Area. This contains 'Conservation Area-like' protections in Policy 2, namely development that:

- "Is human in scale"
- "Has regard to the form, function, structure, and heritage of its context, including the scale, mass"
- "Is sensitive to the height of existing buildings", including that tall buildings should "avoid <u>any</u> negative impact" (emphasis ours) on the West End Green or South Hampstead conservation areas.
- "Has regard to the impact on local views" identified in A11 of the Neighbourhood Plan. This designates views southwards, out of the Neighbourhood Plan Area across South Hampstead: views that would be obliterated by the development.

More careful consideration should be given to the impact on conservation. Instead, the developer has acted as though it being located a few metres outside these conservation areas means that it does not have to have regard to conservation.

The 35% of housing provided on site that is affordable is significantly below the policy target of 50% specified in Local Plan policy H4. This requirement specifically strengthened by Policy 1(i) of the Fortune Green & West Hampstead Neighbourhood Plan.

While we recognise that Camden's Cabinet member for planning has admitted that few developments within the borough hit this target, it is still the policy target, and divergence should only be justified by compensatory factors. The London Planning Authority should not accept being short-changed.

However, the related factors are all, at best, the minimum that is required under Camden's policies:

- Policy H4 specifies a balance within the affordable housing component of 60-40 between social-affordable and intermediate, which this barely scrapes, being exactly 60% social affordable by both habitable rooms and floor areas.
- Policy H4 specifies that London Affordable Rent is a 'social-affordable' rent levels. However, it is clearly the least preferred of social-affordable (being on average 30%-55% higher than social rent and being available only to households that are eligible for those lower social rents). All social-affordable

units proposed are London Affordable Rent: thus meaning the offer is the least preferred under the Local Plan.

The development falls far short of the affordable housing target, and provides the bare minimum in both mix of affordable housing and affordability of that housing in a way that might compensate or mitigate that.

Given the above reasons, this application should be refused.

Yours sincerely,

Colette McNeil

London NW3

From: Kerry-Ann Knights Sent: 31 March 2022 22:30

To: David Fowler

Subject: O2 Masterplan (2022/0528/P)

Not in favour of this. Absolute monstrosity of a building and destroying the largest supermarket and recreational centre in doing so. The building will completely destroy the community by creating these high rise hazards.

Responding to you here as don't consent to my details be img public ally shared (which seems to be the case if you respond though the website) I'm sure you'll appreciate this has the community divided as it's become very polical!

From: Sharon Radley Sent: 06 April 2022 14:46

To: David Fowler

Subject: Planning Application 2022/0528/P

Dr Mr Fowler

I am writing to express my horror of the proposed development of the above site O2 Centre.

The development is unacceptably of the follow:

- Height: hideous jungle of towers swamping the skyline and denying light already enjoyed by residents in the area.
- Density: 5000+ new residents in a tiny area all requiring services in an already overcrowded area.
- Affordable housing: none as developers simply pay the fine so this is a big con by the Council and Developer.
- Loss of Facilities: given Camden Council will receive a massive fee for approving this project, can the Council please inform residents what they will be using the money for eg. providing grocery shops and local facilities being lost, without residents needing to drive to obtain their groceries. We already lost Iceland and now Sainsbury and the book shop.

This development is out of character in its density of development in a tiny space and height which towers over the area and makes it feel like an instant ghetto zone - unattractive. The ugly towers resemble the concrete jungle being built in North Acton, which is in a larger site but so, so ugly on the eye with little to no large open green space.

Please do not let the Developers create another slum neighbourhood where there is no social gardens or community hub, shops area. A strip of green and a few plants is not good enough.

Stop the Developers maximise profit rather than providing a good development for all.

Sharon Radley Camden resident From: juliette radley Sent: 06 April 2022 14:42

To: David Fowler

Subject: O2 Centre Development Concerns

Dear David Fowler,

I am writing to you to express my strong concern with the O2 Centre development in West Hampstead. I have spent my childhood using the facilities that the Centre offer, from using it as a safe space to explore newfound independence after school as a teenager to as an adult using the Centre's restaurant and cinema facilities to keep in touch with friends. Therefore I am deeply upset that the community and the generations below me will lose access to a key safe place, what are Camden council's plans to replace, and with the development's increased population, expand the community space lost to the development? There seems to be no concern for how these community spaces will be replaced, public space and facilities are constantly being sold off or closed, do the council wish for the area to solely be filled with unaffordable and cramped 2-bed apartments with no gardens?

The council seems to prioritise the profits of the property developer LandSec over the people they are meant to represent. Why are so few of the proposed flats unaffordable? Why are these apartments so small, when the demand for family homes is so high? It is unbelievable that Camden council would rather remove public space and community facilities and side with LandSec, a corporation whose employees have likely never even stepped in the borough of Camden. Does Camden council prefer to generate profit at the expense of the community? Does the council genuinely want to improve the community it represents? The public consultations have so far felt like a tick-box exercise, can you ensure that there will be change to the development in-line with the community's concerns? Finally, David can you not see the major issues with allowing this build to take place?

I look forward to reading your reply,

Juliette Radley

From: james kilbourn Sent: 06 April 2022 21:52

To: David Fowler

Subject: Planning Application | 2022/0528/P - OBJECTION

Good Afternoon David,

I am writing in protest to planning application 2022/0528/P.

The O2 centre on Finchley Road is an establishment in North West London offering people of all ages opportunities for both work and leisure.

During my youth, I spent much time with friends at the many restuarants and it is a space where younger people can feel safe and stay out of trouble.

I would expect Camden Counil to value the welfare of its citzens above the financial gains of a large property company.

The BBC Studios developement in White City has sold a substanstial number of flats to wealthy and foreign investors as buy to let properties. It is likely this development will follow the same path.

I do not see how a cost benefit analysis can come out in favour of this development going ahead.

Thanks James From: Judith Kilbourn Sent: 06 April 2022 21:52

To: David Fowler

Subject: Redevelopment of the O2 Centre, Finchley Road

Dear David,

I am writing to object to the proposed redevelopment of the O2 Centre on Finchley Road.

I understand that the plan is to demolish the existing facilities, including:

- the large Sainsbury's supermarket with its associated car park. The only other local supermarket with parking is Waitrose on Finchley Road, which is not in most people's budget. For customers with mobility issues, or young children, this amenity will be sorely missed.
- -the Homebase store. This provides essential homewares, DIY materials, and is the only garden centre in the area. If this store is taken away, it will be extremely detrimental to the local community.
- -The Vue Cinema. This cinema is the only multi-screen in the local area. It provides a valuable social and cultural amenity for the local population. The O2 centre, with it's shops, restaurants and cinema has been so important in the lives of all of us, particularly our children and teenagers growing up. It has provided a safe space for them to meet their friends, to learn independence away from their parents and Carer's without having to deal with traffic and other safety issues.

The proposed development will only provide more residential accommodation, not amenities for the residents to benefit from. The new residents will have to tap into the existing infrastructure of roads, public transport, medical facilities, schools, and social and sporting facilities.

How many jobs are provided by the companies operating in the O2 centre? In the shops, cinema, car showrooms, restaurants?

As a socialist run council, it is particularly disappointing to watch as the local residents are deprived of a much loved local facility, and the council bend to the wishes of greedy property developers.

Shame on you!

Regards
Judith Kilbourn

From: Charlotte Kilbourn Sent: 06 April 2022 21:37

To: David Fowler; Complaints

Subject: Planning application 2022/0528/P

Dear David,

My name is Charlotte Kilbourn, I am 20 and a resident in West Hampstead.

I have recently heard about the plans for the redevelopment of the O2 on Finchely Road and can not express enough my anger and upset regarding this. From a young age, my friends and I have always used and made the most of the O2 and everything that it has to offer. It would be a huge shame to take this away from the new and future young generations. It is a valuable environment and the new proposal of flats would be both an eyesore and huge mistake. Cramped tower blocks are not a worthy use of this great establishment, and I think you would find it to be a largely regrettable mistake should you continue to choose to demolish it. The area is surrounded by three conservation areas, it feels wrong and intrusive on the environment to further damage it with visual pollution and building works which are said to take as long as 15 years. The most profitable use of this land would be to keep it as the O2 centre and up keeping this loved and safe environment.

Furthermore, I am still a student and find that the Vue cinema is the only cinema nearby, other than the Everyman which is far too expensive for young people. The O2 provides shops, an affordable supermarket with parking and many restaurants, which are easily accessible by public transport.

Kind Regards, Charlotte Kilbourn Name: MRS. Anne-Marie Rivers

Address: 1), west Hampstread Mews London N. W. 6 3 82

To: Mr David Fowler Planning Officer

London Borough of Camden

5, Pancras Square

Date: 29/3/22.

Dear Mr Fowler,

Re: Planning Application 2022/0528/P

I/We are writing to object to the above planning proposal in its present form. We have the following concerns, particularly as older people:

The blocks of flats: The whole development is too big for the surrounding area and will put enormous pressure on local services, transport facilities and services, local amenities and shops. The blocks of flats should be no more than eight stories high. They should have two staircases to allow for occupants to escape in the case of an emergency. This is particularly important for older people, and people with mobility problems or disabilities. There should be a mix of sizes of flats, including family accommodation, and at least one third should be 'affordable'. There should be small private gardens for the ground floor flats.

Public areas and facilities: The green space on the development should have benches and be well lit. The community building should be used as a medical centre, and include both GP services and community medical facilities, such as blood tests, dentist, optician, chiropodist, midwife services and a room that could be used for classes including keep-fit. This will help alleviate the pressures that already busy local GP services could face with the growth in population from the development.

O2 shopping centre: This centre is around 25 years old, and is an important facility for local people, particularly the supermarket. It should not be demolished. If the planning committee agrees to demolition, then the new centre should include a supermarket of similar size. There should also be publicly accessible toilets. There should also be parking for people with disabilities.

Services: Local social services, schools and nurseries are already under severe pressure, and would need to be expanded if the development goes ahead. The local library provision should continue, and there is a need for local youth club provision.

Transport: Local services are already under pressure, particularly at rush hour. There is a need for better bus services, particularly the C11, and for lifts to be installed at West Hampstead and Finchley Road underground stations.

If the development goes ahead, during the construction work, there should be arrangements for the construction traffic to be kept to main roads, and that the emergency services access to the area is not restricted.

Please consider all the above issues when making a decision on the planning application.

Signed:		

From: Ysabel Clare

Sent: 05 April 2022 12:08

To: David Fowler

Subject: Planning application 2022/0528/P

Dear Mr Fowler

I object strongly to the proposed O2 development on several grounds:

- 1. Aesthetics: The current plans look like some kind of nightmare Soviet estate, with flats on the inside looking only at other flats on the inside. It will mar the area from guite a distance around, it's an absolute eyesore.
- 2. Size: The sheer number and height of the buildings proposed is frankly ludicrous. It's not only an eyesore but also reminiscent of the blocks just demolished by Brent in Queens Park. Visually it's crammed together and cramped looking. Imagine if you will what it would be like to live in a flat on say the 8th floor on the inside of the estate.
- 3. Number of people: This is wrong on so many levels the already groaning infrastructure of the area; the scope for the stations to cope with the increased numbers when the trains are already full in rush hours by the time they get to Kilburn; the need for schools, doctors, supermarkets and facilities for people to socialise and eat and drink and shop and so on. Where are all these people going to go at the weekend or in their leisure time? The infrastructure is already groaning. And where will the young people go (see below) and hang out? There will be no go areas within the estate, with these very tall buildings so close together.
- 4. The proposed demolition of the O2 centre makes no sense if you are increasing the people living in the area: A smaller supermarket? You have got to be joking. The supermarket will be buzzing at all hours with 1800 new flats. The O2 could be rejuvenated by this, despite the removal of the car park.
- 5. The removal of the car park: Where are the people who currently drive to shop there going to shop? They are doing an amount of shopping that cannot be carried. It will have a knock on effect on traffic to supermarkets such as Tesco Brent Park where on earth does a family shop if you take it away??? If you want to reduce the number of trips to the shops you need to facilitate the ability of the family to transport a larger quantity of stuff. If the 4000 people mooted to be living in the new blocks need to shop, where are they going to go? And if you say 'online', then for every shop there's a van trip it doesn't reduce traffic it increases it, because the people living on site would be able to 'trolley' their shop home to their block if you kept it open. It's completely illogical. Knocking down the O2 centre at a time when we are supposed

- to be taking care of the environment and recycling and so on, is ludicrous waste of resources that already exist. I do not see how Camden can possibly justify the sheer quantity of waste that would be generated. Shame on them for even thinking of it.
- 6. The original plans were much better, and it smacks of greed to have increased the size and scope of the build. There is no reason other than increased profits, and there are so many arguments against it in terms of scale that to the layperson that can be the only reason. Don't make spurious arguments about the need for homes, we know that, but it doesn't justify cramming all these buildings into this site. It could be a model development but my bet is there is no chance of that. Looking at the plans I think it may well be unsafe and unpleasant walking around in the area.
- 7. Why not go back to the drawing board and look at providing things people in the area need first, and then build around that. Some leisure areas, some green space, a pleasant walk through from WH to F Road. The local community is never going to believe the weasel words about it being exciting it's not, to us. Never will be.
- 8. We need social housing, not 'affordable' housing that is nothing of the sort. I would have never been able to afford any of the so called affordable housing on the salary that I as a disabled person was able to make working part time. It's laughable. Build genuine social housing with social rents, then you might have the sympathy and backing of the local community, and can genuinely say that you are doing something for the future. And by the way, not building social housing at social rents costs the taxpayer more in the end because you will have the same number of people on housing benefit, but they will be costing more paying 'affordable' rent than they would cost if the benefit was paying for social rent.
- 9. That brings me to the disability issue. For disabled and elderly, Sainsbury's as it is and the O2 centre are a godsend. Where are we going to go for a safe, dry, warm place to spend a little time with minimum effort. I used to walk through every day before I became unable to walk that far. I could sit, it was warm, it's dry in wet weather, etc. Now, when I can get there I go for a swim and to the cinema and use the bookshop, the eating places and the Starbucks, and I feel safe and not vulnerable. Taking it away? Not happy.
- 10. And finally young people in the area. Where do you think all the kids in the area are going to hang out safely? On the streets? What kind of issues do you think might emerge from that? Issues that will cost money and the well-being of the kids and the peace of mind of the parents.
- 11. I'm moving, because of all of the above, I simply cannot stay in the

area and watch it. So I'm off. I've lived happily in the area for 30 years but the over development of West Hampstead and the attempts to frame a purely commercial development as something that's good for the area. It's an absolute disaster.

Please make them change the plans and do something that might be a 'landmark' development - you have a chance to do something really good here! Don't mess it up...

Regards Ysabel Clare