

**From:** Mey

**Sent:** 31 October 2022 15:50

**To:** David Fowler

**Subject:** Planning reference 2022/0528/P - O2 Centre Masterplan - letter of support to the council for the pla

Mey

Jade house flat no 5

12 Lancaster grove

Camden

NW34NX

I want the details housing plan, is it more to developer business profit or more for Camden community housing. I'm interest if the housing will be affordable for us who live in this borough area.

Also the O2 centre still new such a pity had to demolished it.

I love to see the master plan of the new project. Thanks

Your sincerely,

Mey

**From:** John Artunkal

**Sent:** 31 October 2022 16:01

**To:** David Fowler

**Subject:** Planning reference 2022/0528/P - O2 Centre Masterplan - letter of support

John Artunkal

NW6 3AJ

Dear David Fowler,

I am writing to you to express my huge concern about this plan. I believe it will seriously hurt our community. We will lose many beloved local businesses which we use on a daily basis, we will lose a great meeting point for friends and families in the area, and our shared public services will come under even greater strain.

Your sincerely,

John Artunkal

**From:** Sam

**Sent:** 31 October 2022 16:01

**To:** David Fowler

**Subject:** Planning reference 2022/0528/P - O2 Centre Masterplan - letter of support

Sam  
NW33RB

Dear David Fowler, I am writing to you to show my complete disapproval for the O2 Centre Masterplan proposals (planning reference 2022/0528/P).

They will overburden the area, are too large for the space and do not go far enough to provide benefit to the local community.

Your sincerely,

Sam

**From:** Raisa

**Sent:** 31 October 2022 21:50

**To:** David Fowler

**Subject:** Planning reference 2022/0528/P - I support the O2 Centre Masterplan proposals

Raisa  
14E avenue road  
London  
NW8 6BP

I don't welcome these flats. I understand we need more housing but we also need to support the existing community.

While I understand driving is bad for the environment (I cycle to work so I do my part) I use my car because I need to go shopping with two kids in tow and therefore need to be able to park somewhere. If this car park goes then I will have to drive a further 15 minutes away to the Tesco in hendon as will plenty of other people so this will increase pollution for people who simply have to drive to the shops. Online shopping is only useful so far- really you can only get the good deals in the supermarket as online is much pricier and currently the cheaper things are constantly out of stock online so I'm having to go to the shops to get the cheaper items more often than not.

Not to mention how rubbish it will be to loose this amazing Homebase! It's the only place we can buy DIY bits for miles! We can't just order everything off overpriced Amazon where half the stuff is super bad quality. Really desperately need this Homebase!

I would go so far as to say without these shops and this car park this area will be much harder to live in.

Obviously some of the proposals like green space and a nursery in an area that severely lacks affordable childcare are great but green space could still be built around here without demolishing the only shopping area with a car park for miles.

Your sincerely,

Raisa

**From:** Olesya Gerasimova  
**Sent:** 31 October 2022 21:50  
**To:** David Fowler  
**Subject:** Planning reference 2022/0528/P - Supporting the O2 Centre Masterplan proposals

Olesya Gerasimova  
Flat 6b Exeter Mansions  
Exeter Road  
NW2 3UG

Dear David Fowler, I am writing to you to show my support for the O2 Centre Masterplan proposals (planning reference 2022/0528/P).

I support the proposals to turn the O2 Centre and car park into new homes and shops, a community centre, Health centre, nursery and affordable workspaces, all centred around a new town square.

I also welcome the commitment to improving transport links and re-providing services such as the supermarket, cinema, and gym.

Your sincerely,

Olesya Gerasimova

**From:** Catherine Ittner

**Sent:** 27 October 2022 14:08

**To:** David Fowler

**Subject:** Planning reference 2022/0528/P - Letter of support for redevelopment of the O2 Centre Masterplan

Catherine Ittner  
Flat 26 Taplow House  
Palissy Street  
London  
E2 7LD

Dear David Fowler, I am writing to you to show my support for the O2 Centre Masterplan proposals (planning reference 2022/0528/P).

The plans will transform an underutilised site into new, desperately needed affordable homes, shops, two public parks, and new, vital services such as a community centre, nursery, health centre, and affordable workspaces for local businesses.

Reinvigorating city spaces to be more people-friendly is urgently needed! Not just from a quality of life perspective, but in order to fight climate change and give people a chance for a healthy future.

Your sincerely,

Catherine Ittner

**From:** Andrew McLean

**Sent:** 27 October 2022 14:08

**To:** David Fowler

**Subject:** Planning reference 2022/0528/P - Message of support for the O2 Centre Masterplan

Andrew McLean  
Flat 26 Taplow House, Palissy Street  
London  
E2 7LD

Dear David Fowler, I am writing to you to show my support for the O2 Centre Masterplan proposals (planning reference 2022/0528/P).

The plans will transform an underutilised site into new, desperately needed affordable homes, shops, two public parks, and new, vital services such as a community centre, nursery, health centre, and affordable workspaces for local businesses.

Your sincerely,

Andrew McLean

**From:** Cem Canpolat

**Sent:** 27 October 2022 14:08

**To:** David Fowler

**Subject:** Planning reference 2022/0528/P - O2 Centre Masterplan - letter of support to the council for the pla

Cem Canpolat  
225 Finchley Road  
South Hampstead  
NW3 6LP

Dear David Fowler, I am writing to you to show my support for the O2 Centre Masterplan proposals (planning reference 2022/0528/P).

The plans will transform an underutilised site into new, desperately needed affordable homes, shops, two public parks, and new, vital services such as a community centre, nursery, health centre, and affordable workspaces for local businesses.

Your sincerely,

Cem Canpolat



**From:** Renata Czinkotai

**Sent:** 27 October 2022 14:08

**To:** David Fowler

**Subject:** Planning reference 2022/0528/P - Supporting the O2 Centre  
Masterplan proposals

Renata Czinkotai  
Flat 17, Violet Court  
11 Heybourne Crescent  
NW9 5WY

Dear David Fowler, I am writing to you to show my support for the O2 Centre Masterplan proposals (planning reference 2022/0528/P).

The plans will transform an underutilised site into new, desperately needed affordable homes, shops, two public parks, and new, vital services such as a community centre, nursery, health centre, and affordable workspaces for local businesses.

Yours sincerely,

Renata Czinkotai

**From:** eric.peel

**Sent:** 31 October 2022 00:11

**To:** David Fowler

**Cc:** Planning

**Subject:** Strong Objection to slightly revised O2 Centre site redevelopment plans (Ref. 2022/0528/P)

Dear Mr Fowler,

### **Objection to revised O2 Centre site redevelopment plans (Ref. 2022/0528/P)**

Despite the minor revisions made recently, I still strongly object to this application.

The revised application, submitted last month by the developer, makes only very minor changes to the design of new buildings along Finchley Road, but very little else has changed since the main planning application submitted in January. The development still falls far short of national standards for green open space, and the Council's standards for affordable housing, dwelling mix and dual aspect flats, and no attempt has been made to reduce the building heights or massing, and as such they remain out of place, surrounded as the site is by 4 'low-rise' Conservation Areas.

Crucially, there is still no firm commitment from Landsec (the developers), Transport for London, or Camden Council, to do anything to improve access to West Hampstead or Finchley Road tube stations directly from the O2 site. With tube passenger numbers increasing again post-pandemic, and the new interchange onto the Elizabeth Line at Bond Street, West Hampstead and Finchley Road tube stations desperately need a second or wider entrance, and at least one needs step-free access if they are to safely accommodate .

The first attached paper documents the deficiencies against established London Plan and Camden Policies in respect of the amount of affordable

housing, dwelling mix and single-aspect flats. The second attached document is my earlier full set of comments and objections to many aspects of the originally-submitted plans.

Please would you take these objections into account as you assess the proposal and ensure a redacted version of this summary and the attachments is placed on the case website?

Many thanks.

Best regards,

Eric Peel

2 attachments

## O2 Centre Development-

### Issues of concern relating to Affordable Housing, Dwelling Mix and Single-Aspect dwellings

#### Introduction

The purpose of this document is to highlight a number of major non-compliances of the O2 Centre redevelopment proposals against specific planning policies (from the London Plan, the Camden Local Plan and the Fortune Green and West Hampstead Neighbourhood Plan and the NPPF) relating to Affordable Housing, Dwelling Mix and Single-Aspect Dwellings.

It also highlights a recent letter to Councillors by the Chairman of the London Assembly Planning & Regeneration Committee, giving the findings of their Housing Typologies Investigation, including the problems and excess financial and carbon costs associated with excessively tall buildings. [Letter \(london.gov.uk\)](https://www.london.gov.uk/press-releases/major/london-assembly-chairman-reveals-findings-housing-typologies-investigation).

#### Executive Summary -This document concludes that:

##### A) Inadequate % Affordable Housing, and inadequate % Low Cost Rental within the affordable housing total

There is an inadequate percentage of affordable housing and insufficient percentage of 'Low cost Rental' within the quantum of affordable housing. The only 35% proportion of affordable housing provided on site, is significantly below the policy requirement of 50% specified in Local Plan Policy H4, and by London Plan Policy H4. This requirement is also specifically strengthened by Policy 1(i) of the Fortune Green & West Hampstead Neighbourhood Plan.

The current affordable housing offer is precisely the least affordable allowed under the threshold approach based on not just one metric, but three. Consequently the 'Financial Viability Assessment' (FVA), which currently only shows a marginal return and is used as justification for the very poor provision of affordable housing on all 3 metrics, urgently needs careful review by an independent expert (the current authors are from a consultancy that is already deeply involved in preparing the current Planning submission for the developer, and are therefore not disinterested or independent), in order to understand if the viability is genuinely as poor as is being asserted.

If it is, then Landsec need to be asked to consider cost reduction measures that would allow the percentage of affordable housing (and the percentage of low cost rental housing within that) to be improved. Such measures could include reconsideration of the wasteful (in terms of both carbon emissions and cost) proposal to demolish the O2 Centre and then to have to rebuild the floorspace for a proportion of its amenities and retail activities.

Finally, if the measure of % affordable housing were to be expressed as % Units, rather than by % floor area, then the results are even some 4% worse against both the 35% overall affordable target (Policy H4), as well as against the Low Cost Rental target of 60% of all affordable housing (Policy H7 of London Plan). This is glossed-over in the developer's Affordable Housing Statement, and means even greater non-compliance against both Policies, than already appears to be the case. Please see Section 1 for full details.

##### B) Inadequate Dwelling Mix

The dwelling mix is very far from meeting the requirements of the Camden Local Plan Policy H7, which states *"The Council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply"*.

The dwelling mix currently offered is heavily skewed towards providing hugely excessive numbers of studio/1 bed flats, and far too few larger 3-bed and 4-bed units (actually no 4-bed units). This will simply encourage more transient single tenants, and discourage growing families from settling in the area long-term; growing families will instead continue to be forced to move out of Camden altogether in search of larger, more affordable, housing, as many already are. This is already a major problem in West Hampstead, and must not be exacerbated by the O2 Centre redevelopment. It will result in the loss of longer-term inclusive and cohesive communities, leading to social fragmentation, with likely very adverse effects on petty crime in the O2 development area.

##### C) Excessive proportion of Single Aspect Dwellings

Some 45% of the 608 homes proposed in the detailed proposal will be single aspect, broken down as follows: Private – 420 homes, 210 single aspect; Social rent – 104 homes, 10 single aspect; Intermediate – 84 homes, 52 single aspect.

This flagrantly breaches the requirement of London Plan Policy D6 that housing development *"should normally avoid the provision of single aspect dwellings."* No effort is made to meet the requirement of London Plan Policy D6 that *"a single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating"* resulting in a significant policy conflict.

## Detailed Analysis and Reviews of these three issues

### 1. Inadequate % Affordable Housing, and inadequate % Low Cost Rental within the affordable housing total

The planning policy context is for major housing developments to make provision for 50% homes to be affordable (London Plan Policy H4, Camden Local Plan Policy H4, Fortune Green and West Hampstead neighbourhood plan Policy 1). The proposals seek instead to justify 35% affordable housing provision on the basis of a Financial Viability Assessment that concludes that “35% is the maximum reasonable level of affordable housing that can be provided”. Conveniently this conclusion aligns with the 35% provision required under the “[Threshold Approach](#)” of the London Plan (Policy H5 of London Plan 2021).

Similarly, the maximum proportion of affordable rent that can be social is proposed as 60% (conveniently exactly the minimum specified in Policy H7 of the London Plan) and the lowest rent level that can be provided within that social housing is London Affordable Rent (conveniently exactly the highest rent that is still considered social rent). This affordable housing offer is therefore precisely the least affordable allowed under the threshold approach based not on just one metric, but three.

When the percentage of affordable housing is measured in terms of Units (as is commonly assumed to be the case) rather than by percentage of affordable ‘floor area’ or ‘Habitable Rooms’ (as has been done by the developer), then the results actually fall far short of even these two barely-achieved targets:

- % Affordable Housing by Units is only approx. 30.92% for the Phase 1 (Detailed application) and 31.51% overall for all phases against the 35% requirement.
- % Low Cost Rental units as a proportion of total Affordable Units is approx. 55.32% for Phase 1 and 55.6% for all phases against the 60% requirement. (See Annex 1 for more information)

Importantly, the view expressed in the pre-application advice to the developer from Camden Planners, was that “this is a very unconstrained site in comparison to most large development sites in the borough” and “the proposed affordable housing should be significantly increased”. This view is strongly supported and Councillors are strongly urged to lend their support to this view. The developer must be required to improve their offer in this regard.

#### 1.1 Financial Viability Assessment needs to be closely, and independently, reviewed

The [Financial Viability Assessment \(FVA\)](#) should be contested. (Note: This was produced by a consultancy that has already been deeply engaged by the developer in preparing the overall Planning submission for the O2 redevelopment, and that can arguably therefore not be considered fully ‘independent’). An independent review of the FVA methodology and conclusions must be sought. It is a remarkable coincidence that it concludes the same level of affordable housing provision as is required to make use of the London Plan’s Threshold Approach (Policy H5) and we are not aware of any unusual up-front development costs that would prevent a minimum of 50% affordable housing being provided on site.

The FVA portrays the viability (Internal Rate of Return- IRR) for the overall project (Detailed proposals plus Outline proposals) as only being, at best, borderline. It has “*adopted a target rate of return of 13.2% IRR on a present-day basis and 17.2% on a growth basis*” (para. 10 of Exec. Summary on page 7).

It further states: “*The FVA and corresponding appraisals help determine the potential financial contribution and planning obligations as an aggregated “pot”. The financial planning obligations and CIL for the Scheme are shown in the table overleaf.*”

It also states (see page 8, paras 14 & 15) that (please note- the highlighting is the author’s own):

*“The results indicate that in overall terms, the Scheme achieves a return which is below the benchmark return level. Our appraisal results are set out in the below table:*

<b>Present Day Appraisal</b>	<b>Target IRR %</b>	<b>Output IRR %</b>
<i>Scheme (35% Affordable Housing)</i>	13.2%	3.3%

*This shows that on a present-day basis the Scheme demonstrates **a return below the blended target rate of return**”.*

It further states that because of the 15-year long duration of the development phases, they have undertaken a growth (forecast model), as follows (see page 9 , paras 16-18):

*“We have also undertaken a growth (forecast) model, which applies inflation to build costs and revenue growth to the revenue items, at varying rates. Our growth appraisal results are set out in the below table:*

<b>Growth Appraisal</b>	<b>Target IRR %</b>	<b>Output IRR %</b>
<i>Scheme (35% Affordable Housing)</i>	17.2%	13.0%

*17. Our growth-based analysis of the Scheme demonstrates an improved return when compared with our present-day analysis, **albeit still below the target rate of return.***

18. We have undertaken sensitivity analysis to substantiate this assessment as per Section 2.9 of the RICS Practice Statement: Viability in Planning, Conduct and Reporting (2019). Within this we test the inputs we have used in our appraisals to test the robustness of delivering the Scheme. They show that **whilst the potential to reach the target rate of return based on present day inputs is limited, the Scheme is potentially capable of being viable on a growth basis and is therefore deliverable**”.

An urgent independent review of the FVA, including the ‘Sensitivity Analysis’ is needed as part of an independent FVA review. For example, it is entirely possible that the ‘Sensitivity Analysis’ does not factor in a sufficiently worst case view of the huge cost inflation for materials and labour currently being experienced in the construction industry, as evidenced by the BICS (RICS) building cost indices.

Otherwise there is a risk of even the current level of the affordable housing ‘offer’ being withdrawn downstream, if outturn costs spiral. As an example of this, one only has to look at the 100 Avenue Rd (Swiss Cottage) debacle, where Essential Living were seeking to renege on their earlier commitments on affordable housing provision, pleading inadequate viability.

## 1.2 Cost reduction opportunity through re-purposing/refurbishing the O2 Centre rather than demolishing

If this enormous proposed development is genuinely so marginal in its viability as the FVA currently seems to show, then LandSec need to be required to significantly reduce the costs and scope of their development, so as to achieve a sufficiently large rate of return that allows a much greater proportion of provision of affordable housing.

One obvious way to reduce costs is to preserve (instead of demolishing), and re-purpose as necessary, the O2 Centre itself.

The idea of demolishing and carting-away a huge, sound structure that is only some 22 years old, with huge amounts of embedded carbon in both the concrete and steel, only to have to then rebuild from scratch, using high-carbon materials, many of the same amenities that it currently contains, is an act of almost criminal environmental vandalism in the current Climate Emergency. Camden must not become complicit, by supporting it. Retention of the O2 Centre also aligns fully with the most recent draft Site Allocations Local Plan (Camden SALP) document dating from late 2019/early 2020, which envisaged 950 new dwellings (not the current 1900) in the car park and Homebase areas only, and retention of the O2 Centre itself.

In addition to the huge carbon emissions costs, the financial cost of demolishing the O2 structure itself is some £3.1M. Then the cost of rebuilding to re-provide the greatly reduced amount of replacement commercial and retail floorspace that is currently being offered by LandSec (which will still only be some 40% of the floorspace that the O2 Centre currently provides) will be approximately £21.6M, so about £24.6M in total. As an observation, if the full floor area of the current O2 Centre structure were to be rebuilt in various locations to accommodate all of its former amenities and retail outlets (which Landsec are not offering to do), then this would cost around £58.5M including demolition. (Note: All cost estimates obtained from the FVA).

## 2 Detailed analysis of Inadequate Dwelling Mix

The range of types of new homes being provided is inadequate and non-compliant with Camden Local Plan Policy.

Camden Local Plan Policy H7 states *“The Council will aim to secure a range of homes of different sizes that will contribute to creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply. We will seek to ensure that all housing development, including conversion of existing homes and non-residential properties: a. contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and b. includes a mix of large and small homes”*.

The detailed proposals provide for the following range of housing types (compared with the need identified in Camden’s Strategic Housing Market Availability Study (SHMA) in the final column). Significant non-compliances with the SHMA are highlighted:

Type of Unit	Number in Detailed Phase	% in Detailed Phase	Need identified in Camden’s Strategic Housing Market Availability Study (SHMA)
Studio/ 1- bedroom	278	46%	8%
2- bedroom	248	41%	37.5%
3- bedroom	82	13%	37.5%
4- bedroom	0	0%	16%

87% of the development will be one and two bedroom homes which is double the need identified in Camden’s SHMA.

The housing types can be broken down as follows and compared to the expectations of Camden Local Plan Policy H7’s Dwelling Size Priorities table (non-compliances shown in red):

Type of Unit	Social Rent		Intermediate		Market	
	Proposal	Local Plan guidance	Proposal	Local Plan guidance	Proposal	Local Plan guidance
Studio/ 1- bedroom	2%	Lower	8%	High	36%	Lower
2- bedroom	6%	High	8%	Medium	31%	High
3- bedroom	9%	High	2%	Lower	3%	High
4- bedroom	0%	Medium	0%	Lower	0%	Lower

The proposals depart from policy expectations in eight of the twelve categories, over-providing smaller market homes and under-providing larger affordable homes.

The proposals also conflict with the needs of the local area (Local Plan Policy H7 allows divergence from the borough-wide priorities if local needs diverge from borough-wide needs). West Hampstead has the fifth highest number of one-beds of any ward in Camden, after only the three most southern wards and Kilburn. However, unlike the three most southern wards, there is not a university campus nearby, so this is not driven by a genuine local need. There is therefore already a significant under-provision of two- and three-bed flats in West Hampstead, in breach of Local Plan Policy H7 and Neighbourhood Plan Policy 1(ii).

This is already a major problem in West Hampstead, and must not be exacerbated by the O2 Centre redevelopment. It will result in the loss of longer-term inclusive and cohesive communities, leading to social fragmentation, with many transient renters, and growing families being forced to move out of West Hampstead/Camden altogether, with likely very adverse effects on petty crime in the O2 development area.

The scale of the regeneration opportunity on the site means that it should be an exemplar in meeting the need for a diversity of types of new homes. We do not consider evidence has been provided to justify such a significant departure from the priorities established in Camden’s planning policy.

### 3 Excessive proportion of Single Aspect Dwellings – Detailed analysis of non-compliance

The London Plan Guidance (LPG) on Housing Design Standards states as follows, with regard to Aspect, Orientation, daylight and sunlight (Section C4) and Thermal Comfort (Section C6.1):

*“C4.1 New homes should be dual aspect unless exceptional circumstances make this impractical or undesirable; for example, when one side of the dwelling would be subjected to excessive noise or outside air pollution. Where single aspect dwellings are proposed, by exception, they should be restricted to homes with one or two bedspaces, should not face north and must demonstrate that the units will have adequate passive ventilation, daylight and privacy, and not overheat (particularly relevant for south or west facing single aspect units).”*

*“Thermal comfort C6.1 Reduce the risk of overheating, through orientation, layout, the natural cross-ventilation afforded by dual aspect, window design, and shading devices. Active cooling should be a last resort”.*

London Plan Policy D6 requires that housing development “should normally avoid the provision of single aspect dwellings”.

For the current ‘Detailed Proposals’ for the O2 Centre site redevelopment, it is calculated that 272 (a full 45%) of the 608 homes included in the Detailed Proposals will be single aspect - broken down as follows:

Private – 420 homes, 210 single aspect; Social rent – 104 homes, 10 single aspect; Intermediate – 84 homes, 52 single aspect

The Planning Statement also confirms the expectation that the additional c1200 homes to be provided through the Outline Proposals will “be designed to the same standards as the Detailed Proposals” (para 10.53) raising the prospect of the development providing over 800 single aspect flats in flagrant breach of planning policy.

Remarkably the Planning Statement emphasises the “overall plan form offers many opportunities for dual aspect apartments” (paragraph 10.51) seemingly oblivious to the requirement of London Plan Policy D6 that housing development “should normally avoid the provision of single aspect dwellings.”

No effort is made to meet the requirement of London Plan Policy D6 that “a single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating” resulting in a significant policy conflict.

As is evident from the recent and increasingly frequent very hot weather, a single-aspect flat can be almost impossible to cool by natural through-ventilation.

#### 4 Letter to Councillors from Chairman of the London Assembly Planning & Regeneration Committee

In Autumn 2020 the GLA Planning and Regeneration Committee conducted an investigation into COVID19, Housing Typologies and Design in London. A key emphasis was on housing density and the development of tall buildings for residential use in London.

The Chair of the Committee (Andrew Boff AM), has written directly to local councillors to share their findings from this investigation, which it is hoped will be of interest and relevance to Councillors' work. This letter may have particular interest for those with planning responsibilities or those commenting on local planning applications. [This letter discusses the following issues:](#)

- The costs of tall buildings
- Density
- The impact on families
- Quality of design
- Post-COVID 19

Their key finding is that the Committee does not believe that tall buildings are the answer to London's housing needs and should not be encouraged outside of a few designated and carefully managed areas.

Camden Councillors are strongly urged to carefully review the evidence gathered and presented in this study, with particular reference to the current highly problematic proposals for the O2 Centre site redevelopment in terms of the adverse effects on the future occupants of the development. The Letter to Councillors is available here [Letter \(london.gov.uk\)](#).

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#### Annex 1

##### Affordable Housing by % of Units (Camden Local Plan and London Plan Policy H4)

The following tables are taken from the '[Affordable Housing Statement](#)' by LandSec

The normal understanding of % affordable housing is that it is the proportion of the number of Units out of the total number of Units, that are Affordable. The Affordable Housing Statement instead (perhaps deliberately?) concentrates solely on the % floor area of the total residential floor area that is Affordable, or as a proxy for this, also the % Habitable Rooms that are Affordable out of the total number of Habitable Rooms.

Surprisingly, the '[Affordable Housing Statement](#)' studiously avoids showing the % of the number of Units that are affordable. When this information is calculated and inserted, it is revealed that on this commonly-understood measure the % of Affordable Housing for both the Detailed Scheme and the Outline Scheme the % Affordable falls well short of the requirement.

This information has been added to the key summary tables in the '[Affordable Housing Statement](#)' where it may clearly be seen that on this measure the % Affordable Units is some 3.5% to 4% short of the 35% minimum London Plan and Camden Local Plan requirement (Policy H4), as highlighted:

**Table 3.1- Affordable Housing Amount (Detailed Scheme- Phase 1) with addition of % affordable Units column (Page 18)**

Type	Units	% Units	Habitable Rooms	% Habitable Rooms	Floor Area (GIA Sqm)	% Floor Area (GIA Sqm)
Private	420	69.08%	1002	64%	35,754	65%
Affordable	188	30.92%	567	36%	19,426	35%
<b>Total</b>	<b>608</b>	<b>100%</b>	<b>1569</b>	<b>100%</b>	<b>55,180</b>	<b>100%</b>



**Table 3.4 – Affordable Housing Amount (Detailed and Outline Illustrative Combined- Phases 1, 2 & 3) with addition of % affordable Units column. (Page 19)**

Type	Units	% Units	Habitable Rooms	% Habitable Rooms	Floor Area (GIA Sqm)	% Floor Area (GIA Sqm)
Private	1230	68.49%	2939	63.32%	110,862	65.37%
Affordable	566	31.51%	1703	36.68%	58,728	34.63%
<b>Total</b>	<b>1796</b>	<b>100%</b>	<b>4642</b>	<b>100%</b>	<b>169,590</b>	<b>100%</b>

In both the above cases, the % of Affordable Units falls well short of the minimum 35% requirement. This is because the dwelling mix of Market units is so heavily skewed away from the preferred 2-bed and 3-bed units, towards 1-bed/studio units, despite Camden’s own Strategic Housing Market Assessment (SHMA) which indicates the more balanced mix that is needed throughout the Borough (37.5% each of 2-bed & 3-bed units). See subsequent item regarding Dwelling Mix.

**Tenure Split by % of Units** (London Plan Policy H7 (Affordable Housing Tenure))

The London Plan and Camden Local Plan requirement for Tenure Split within the Affordable Housing category (based on London Plan Policy H5) is for the proportion of Low Cost Rent to Intermediate Rent Units should be 60% / 40%. When the Tenure Split by Units is added to the existing tables that show only the split by floor area/Habitable Rooms, it is clearly revealed that on this measure the proportion of Low Cost Rent Units at around 55.6% falls well short of the 60% requirement, as highlighted in the tables below:

**Table 3.5 – Tenure Mix of Affordable Housing (Detailed scheme- Phase 1) with addition of % of affordable Units column. (Page 19)**

Type	Units	% Units	Habitable Rooms	% Habitable Rooms	Floor Area (GIA Sqm)	% Floor Area (GIA Sqm)
Low Cost Rent	104	55.32%	352	62%	11,638	60%
Intermediate	84	44.68%	215	38%	7,788	40%
<b>Total</b>	<b>188</b>	<b>100%</b>	<b>567</b>	<b>100%</b>	<b>19,426</b>	<b>100%</b>

**Table 3.8 – Tenure Mix of Affordable Housing (Detailed and Outline Illustrative combined- Phases 1, 2 &3) with addition of % of affordable Units column. (Page 20)**

Type	Units	% Units	Habitable Rooms	% Habitable Rooms	Floor Area (GIA Sqm)	% Floor Area (GIA Sqm)
Low Cost Rent	315	55.65%	1027	60.3%	35,319	60%
Intermediate	251	44.35%	676	39.7%	23,409	40%
<b>Total</b>	<b>566</b>	<b>100%</b>	<b>1703</b>	<b>100%</b>	<b>58,728</b>	<b>100%</b>

In both the above cases, the % of Low Cost Rent Units falls well short of the minimum 60% requirement. This is because the dwelling mix of ‘Intermediate’ units is so heavily skewed away from the preferred 2-bed and 3-bed size of unit, towards 1-bed/studio units, despite Camden’s own Strategic Housing Market Assessment (SHMA) which indicates the more balanced mix that is needed throughout the Borough (37.5% each of 2-bed & 3-bed units). (Note: See section 2) on inadequate Dwelling Mix).

To: Mr David Fowler, Case Planning Officer, London Borough of Camden

From: Mr E Peel, 172 Goldhurst Terrace, London NW6 3HN

**Strong Objection to O2 Centre site redevelopment plans (Ref. 2022/0528/P)**

Dear Mr Fowler,

I strongly object to the proposed development on the following grounds and as measured against the principles outlined in the various plans which already exist namely:

The London Plan; the Camden Local Plan; the Fortune Green & West Hampstead Neighbourhood Plan and Camden's own 2013 site allocations and its 2019 draft Site Allocations (the 'West Hampstead Interchange' site within the latter, which includes the sites which are the subject of the current application, was very recently substantially objected-to on its second consultation by up to 666 local residents. Please see: <https://growthsalp.commonplace.is/proposals/west-hampstead-interchange> ).

It is disgraceful that Camden planners appear, over the last 18-24 months, to have explicitly and knowingly guided the developer to propose such an overblown scheme, which is totally out of keeping with the surrounding four Conservation Areas, and introduces a vastly excessive degree of massing, multiple building heights and dwelling density that goes against all the principles of good design. This will adversely impact many of the unfortunate new residents who are to be housed there, and will undoubtedly lead to social problems and widespread anti-social, if not criminal, behaviour on the new estate. Please also refer to the recent comments and concerns of the Metropolitan Police on this matter.

Closely-related to this, it also ignores the excellent guidance given by the recent report from the London Assembly Planning and Regeneration Committee on Housing Typologies and Design in London, for the post-Covid19 era (September 2021). They conducted an investigation into COVID-19, Housing Typologies and Design in London. A key emphasis was on housing density and the development of tall buildings for residential use in London. Key areas touched on during the course of the investigation are:

- The costs of tall buildings
- Density
- The impact on families
- Quality of design
- Post-COVID 19

Please see the following links, and in particular the letter to London Councillors from Andrew Boff (AM), the Chair of the London Assembly Planning and Regeneration Committee of 2<sup>nd</sup> September 2021:

<https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/covid-19-housing-typologies-and-design-london>

[https://www.london.gov.uk/sites/default/files/good\\_quality\\_housing\\_response.pdf](https://www.london.gov.uk/sites/default/files/good_quality_housing_response.pdf)

[https://www.london.gov.uk/sites/default/files/letter\\_to\\_councillors\\_-\\_housing\\_typologies\\_1.pdf](https://www.london.gov.uk/sites/default/files/letter_to_councillors_-_housing_typologies_1.pdf)

For Camden to have proudly admitted to having 'co-designed' such an over-blown development scheme with the developer (as was apparently recently stated in a report to a Cabinet meeting) is a disgraceful reflection of where Camden's true interests now appear to lie, and is a complete betrayal of Camden's proud history of supporting human-scale and very enlightened housing schemes. Both the relevant Planning Officers and the relevant Cabinet members should hold their heads in shame at this.

Specific grounds for objection and refusal are as follows:

## Tall Buildings

London Plan policy D9, paragraph B states, “Tall buildings should only be developed in locations that are identified as suitable in Development Plans.”

As Camden has not designated anywhere in the borough as suitable for tall buildings, it would be reasonable to assume that were it to, it would designate this area as unsuitable. This is based on the factors specified in paragraph C:

Where harm is done to heritage assets, there must be a “clear and convincing justification”. It does do significant harm to the surrounding conservation areas without such a justification.

Furthermore, it must be demonstrated that the capacity of the transport network nearby is “capable of accommodating the quantum of development”. It clearly would overburden the local Underground stations, which are already stretched to capacity and limited in access.

The area is not suited to high-rise buildings with 10 storeys an absolute maximum height for the area, in-keeping with the tallest buildings already in the area, eg:

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

The proposed development contains several buildings that are taller than either of the above. It is thus 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 – preferably less - under London Plan policy D9. But as it is not, it should be resisted.

## Conservation

The development is sandwiched tightly between the Fitzjohns & Netherhall, Belsize, South Hampstead, and West End Green Conservation Areas. These conservation areas are defined by similar characters and development typologies namely:

These are low- and medium-rise, the most typical building being three to four storeys above ground with a lower ground level. They are primarily red- or yellow-brick terraces and mansion blocks. Unrendered brick is the absolutely dominate material in the conservation area, and both palette and materials 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 *any* negative impact” (emphasis ours) on the West End Green or South Hampstead conservation areas.

“Has regard to the impact on local views” as 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.

Given the above requirements, 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. So, another of many reasons that it should therefore be resisted.

For example, a number of the simulation pictures offered in the planning documentation to illustrate the visibility of the tall and closely-packed buildings in the O2 site proposals when viewed from key points in the South Hampstead Conservation Area, appear to have been framed as 'wide-angle' photographs (eg. 28mm lens), which of course greatly diminishes the impact and visibility of more distant objects. This is wholly misleading, not to say mendacious, and shows bad faith on the part of the developers and their agent that did this work. The views from Priory Rd and Fairhazel Gardens looking north will be particularly egregious and the looming mass of buildings will generally do substantial harm to the vistas from this and many other CAs.

In observations, already 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.'*

### **Car parking and continuing amenities**

This application fundamentally misunderstands Camden's policy of car-free development, and in doing so, cannot provide for the amenities that it states. Camden's policy of 'car-free development' is defined for redevelopments at paragraph 10.20 of the Local Plan. This paragraph states that:

The council will consider retaining or re-providing existing car parking where it can be demonstrated that the existing occupiers intend to return to the development after it is redeveloped.

The applicant has said that it intends to retain a commercial involvement and management of the site, so it is a redevelopment.

This is particularly the case where the car park supports the functioning of a town centre. In this case, the O2 Centre is within the Finchley Road & Swiss Cottage town centre. The existing (2013) site allocation states that the redevelopment of the car park is permitted 'provided it does not result in a detrimental impact on the surrounding area and the functioning of the Town Centre'.

As a long time local resident, 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 permanently, rather than just within controlled hours, as was the case before 2020. This has put even greater importance on the car park for shoppers at commercial premises other than the redevelopment site, elsewhere in the Finchley Rd 'Town Centre'.

### **Viability of amenities**

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, particularly with the recent loss of Morrisons at Chalk Farm due to other redevelopment. 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.

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 under agreement with the Competition & Markets Authority to charge higher prices than larger supermarkets of the same brand. 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 again is another reason it should be resisted.

### Lack of Affordable housing

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.

Even though Camden 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. Such exceptions with little justification make a mockery of all these plans, and 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 – furthermore – provides the bare minimum in both mix of affordable housing and affordability of that housing in a way that might compensate or mitigate that. It should therefore be resisted.

### Completely inappropriate Housing Mix

Local Plan policy H7 says that “we will seek to ensure that all housing development, including conversion of existing homes and non-residential properties:

- a. contributes to meeting the priorities set out in the Dwelling Size Priorities Table; and
- b. includes a mix of large and small homes.” [large is defined as 3-bedrooms and above]

The Dwelling Size Priorities Table is reproduced here:

**Table 1: Dwelling Size Priorities**

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

Analysis of the dwelling mix for the ‘detailed O2 site proposals’ (ie. Phase 1) show that the proposal falls very far short of Camden’s own Strategic Housing Market Assessment (SHMA) which indicates the mix that is needed throughout the Borough. The table below compares the proposed O2 site development mix (‘Detailed proposals’/Phase 1) with the Camden SHMA, which provides the evidence base for Policy H7.

	<b>Studio/1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>
<b>Need in Camden SHMA</b>	<b>8%</b>	<b>37.5%</b>	<b>37.5%</b>	<b>16%</b>
<b>Proposed development (In 'Detailed Proposals')</b>	<b>46.1%</b>	<b>43.2%</b>	<b>10.6%</b>	<b>0 %</b>
<b>Over (+)/ under (-) supply</b>	<b>+38.1%</b>	<b>+5.7%</b>	<b>-26.9%</b>	<b>-16%</b>

This shows that 89.3% of the proposed 602 homes will be studio, 1-bed and 2-bed flats. As a proportion this is twice as many as Camden's own Strategic Housing Market Assessment (SHMA) says is needed throughout the Borough. There will be no 4-bed dwellings.

In these respects the proposed dwelling mix is as egregiously out-of-kilter with what is required in Camden as is the dwelling mix proposals for the nearby Murphy's Yard development. This will continue to encourage 'transient' 1- or 2- person households in the area, and will force families needing 3 or 4 bedrooms out of the area, and probably out of Camden altogether, mitigating against any longer-term building of true communities.

### **In conflict with Camden's Climate Change and Clean Air Action Plan?**

There are sound reasons not to demolish the O2 Centre, which is only around 23 years old and is still in excellent condition. 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.

Unnecessary construction (ie. the need to rebuild from scratch many of the amenities and safe, indoor, social spaces already very well provided by the existing O2 Centre) 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 NO<sub>2</sub> emissions, 24% of PM10 emissions and 9% of PM<sub>2.5</sub> emissions in Camden.

### **Lack of Open Space Green provision**

Camden's own Local Plan policy A2, sets out a requirement of 9 sq. metres of open space per occupant. This would imply an open space requirement at the O2 site of 40,000 – 45,000 sq. metres, (Based on an average occupation rate of 2.5 people per flat, the development may be expected to accommodate 4,500 residents).

Whereas the Landsec proposals fall very far short of this in offering only:

- 3,000 sq. m in the form of community gardens
- 3,000 sq. m 'Finchley Square'
- A public green (3,800 sq. m) and
- A linear walkway (5,200 sq.m)

Which in total only gives some 15,000 sq. m. This is just one third of Camden's own policy requirement – for an area that is already officially green-space deprived.

This will also be aggravated by the many very narrow, canyon-like, spaces between the tall blocks, that will mostly be in the shade, dark, and will be excellent 'venturi-effect' wind-tunnels in anything more than a light breeze. No-one can seriously consider this to be usable 'open green space', and yet it is egregiously and mendaciously counted towards the total by the developer. This shows a contempt by the developer for the well-being and amenity of the new residents, and Camden must not become complicit in also showing this same contempt for their own new residents.

In short, there many minuses and barely a single plus for this development as currently proposed.

**Please can Camden therefore refuse consent for the scheme as currently proposed?**

Instead, a smaller number of around 950 units maximum, accommodated in lower rise and less dense building over the larger 5.7ha site, with far more innovative and enlightened design, and with no demolition of the much-loved and highly-valued O2 Centre itself, is what is now required.

If Camden is unable to appropriately guide the developer to a more acceptable scheme (its Planners and Cabinet appear to have abysmally failed in this over the last 2 years) then please instead task the local community leads to work with the developer to achieve this.

Camden has acknowledged that it only needs to generate 950 new dwellings on this site to meet its housing targets. Anything above this number demonstrates pure greed on the part of the developer and of Camden, and contempt by both for their new residents and for all of Camden's existing residents who greatly appreciate and enjoy the present amenities.

I hope this is not just a box ticking exercise and that the above objections will halt this development as currently constituted in its tracks.

Thank you

Mr E Peel