

From: Lily Horvath

Sent: 01 November 2022 09:14

To: David Fowler

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

Lily Horvath

Flat 18

Blair court

London

NW86NT

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

I am very pleased with the proposed redevelopment of the area. Finally a long neglected and unloved part of Camden will get a new lease of life.

Greening the area while providing much needed housing stock to this part of London will be a great drive for change.

Your sincerely,

Lily Horvath

From: Thomas Fluskey

Sent: 01 November 2022 09:14

To: David Fowler

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

Thomas Fluskey
65 Hermitage Court
Barnet
NW2 2HB

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

Your sincerely,

Thomas Fluskey

From: Emily

Sent: 01 November 2022 09:14

To: David Fowler

Subject: Planning reference 2022/0528/P - Submission of support for O2 Centre Masterplan

Emily

iQ Haywood House

Blackburn Road

London

NW61RZ

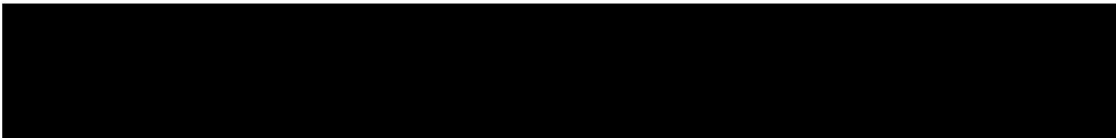
Dear David Fowler, I am writing to you to show my support for the O2 Centre Masterplan proposals (planning reference 2022/0528/P).

Your sincerely,

Emily



Subject: O2 Masterplan DAS 16-09022 / Complaint / West Hampstead station overcrowding/ fatality issue

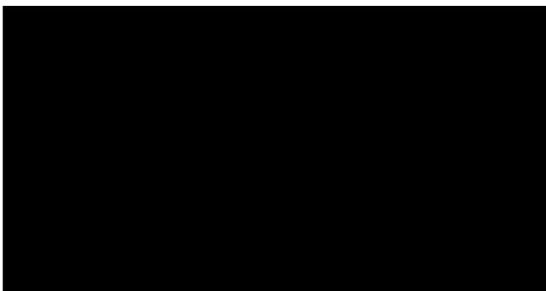


Hi there,

This is really worrying how there is no firm commitment from Landsec, Transport for London, or Camden Council, to do anything to improve access to West Hampstead tube station to accommodate the huge numbers of new residents and daily commuters. As West Hampstead tube is an open station, with no protection, i.e Westminster, this could lead to casualties/fatalities with overcrowding. Can you explain how you are going to ensure West Hampstead station is upgraded as part of the development plan?

Kindest Regards

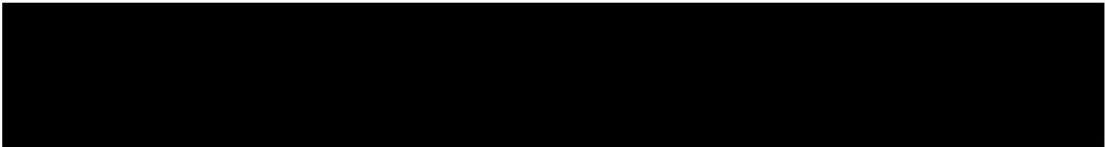
James Tomlinson
Flat 2, 4 Sherriff Road, London, NW6 2AP



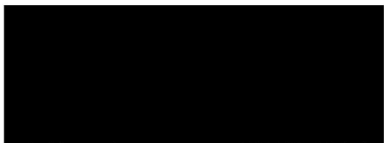


Subject:

Re: Application 2022/0528/P



I understand there have been some revisions by the proposed developers, principally on the design along the Finchley Road frontage, but the proposals otherwise remain substantially the same. Accordingly the objections I made earlier this year in March remain I believe fully valid, and for convenience sake are set out again below.
Regards A.Kay 26 Crossfield Road, Swiss Cottage, NW3 4NT



Subject: Comments on 2022/0528/P have been received by the council.

My wife and I live in Swiss Cottage about 15 minutes walk from the O2 Centre, and wish to oppose the development proposals. We go regularly twice a week to shop for food in the Sainsbury supermarket, and also on occasions to the few remaining shops and restaurants. The closure of the Sainsbury's will be a great loss to us, and so we think it should be a condition that there should be a replacement food supermarket in any new development.

Fortunately we can still, and prefer, to walk so only use a car when it is pouring with rain, or having something heavier to collect from Homebase. We still think it important there is some parking for the new supermarket, but it somehow should be limited to those using the centre, as at present a lot of the parking seems to be occupied either permanently or by commuters.

While new housing nowadays seems to be squashed in anywhere, this site between two heavily used railway lines is hardly ideal. Having said that the whole development seems to be of an excessive scale, both in the size, number and height of the individual blocks, and the total number of people to be accommodated. I am also concerned that this development, like most nowadays, is likely to be of one and two bedroom flats with the minimum of cooking facilities; so not suitable as a long term home especially for families, which is the type of accommodation I consider likely to be the most needed.

Comments made by A.Kay of 26 Crossfield Road, Swiss Cottage, NW3 4NT

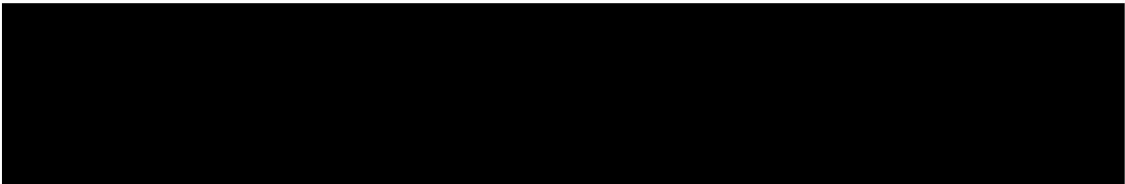


Comment Type is Objection



Subject:

Planning Application No. 2022/0528/P - O2 Centre



I would like to object to the revised application for the redevelopment of the O2 shopping centre, Homebase store and car park. The revised application which was submitted last month makes very few significant changes from the main application submitted last winter.

It is however notable that in a highly congested area where public transportation is under continuing pressure, Landsec is making absolutely no commitment to any improvements to West Hampstead tube station, even though access to the site by public transport, foot and bike are already inadequate both from crowded Finchley Rd and from crowded, narrow West End Lane. It is simply irresponsible to propose adding thousands more road and transport users when people are already struggling.

The development itself is ugly and overpowering and does not meet Camden's standards for affordable housing or the national standard for green parks and open spaces. It does not have adequate play areas for children and is not a suitable environment for families with towering blocks and constant day and night noise from trains and roads.

The Aldi Local currently occupying the O2 frontage on Finchley road is now open and is a most inadequate alternative to the present large Sainsburys supermarket selling both clothing and a very wide range of goods. This Aldi sells a limited range of foodstuffs and a random selection of non-food products which look like a jumble sale and fall into no particular category except of being cheap. To add thousands more customers and then close Sainsburys, which actually offers the useful shopping, will greatly reduce the day to day convenience of existing residents, let alone the poor people who have to live in the development.

This ill conceived O2 planning application should be wholly rejected.

Sincerely

Jennifer Woolf
17 Canfield Gardens,
London NW6 3JP



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

Attachments: O2 Centre Development Briefing on Affordable Housing_Dwelling Mix_Single Aspect 11_Aug_22.docx; Objection to O2 Centre application 9 April 2022.docx



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

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 2nd 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/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 Priors 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.

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

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 NO₂ emissions, 24% of PM10 emissions and 9% of PM_{2.5} 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

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-issues-report).

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:

Present Day Appraisal	Target IRR %	Output IRR %
<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:

Growth Appraisal	Target IRR %	Output IRR %
<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 \(london.gov.uk\)](#).

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%
Total	608	100%	1569	100%	55,180	100%

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%
Total	1796	100%	4642	100%	169,590	100%

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%
Total	188	100%	567	100%	19,426	100%

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%
Total	566	100%	1703	100%	58,728	100%

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).

From: Mich Si

Sent: 01 November 2022 09:19

To: Planning

Subject: Redevelopment O2 car park and Homebase

Dear Sir or Madam

I would like to comment on the plans submitted for redevelopment of the West Hampstead O2 car park and Homebase shopping centre.

I think the proposals are lacking green spaces. I am also missing a clear commitment to do anything to improve access to West Hampstead tube station. With tube numbers increasing again post-pandemic, and the new interchange onto the Elizabeth Line at Bond Street, West Hampstead tube station needs a lift, and a wider entrance.

Best regards

Michael Singh

From: Helen Mandley
Sent: 02 November 2022 11:03
To: David Fowler; Planning
Subject: O2 redevelopment

Dear David Fowler,

I've seen pre written templates online to support the redevelopment plans of the O2 centre. The plans have not been distributed to the community in NW6 or have they been advertised at the O2 centre, car park, sainsburys or Homebase of which I use on a regular basis for myself, a disabled car driver and for taking elderly local residents to. I'm very concerned about these plans on a personal level and on a wider level for the local residents and community. Plans will say they are building communities, I doubt very much that local people will buy these homes, it will be increased residential density putting more pressure on local services and vital needs such as GP, school and other services in high demand. Not only that, there will be years of disruption, air pollution, noise pollution, tailbacks on the Finchley rd which will have a knock on effect to West End Lane and Kilburn High Road. Already bumper to bumper traffic during am and pm rush hours. As a personal need, I won't have somewhere I can take elderly neighbours to shop due to the parking situation and I imagine the supermarket will be much like the aldi installed in the O2 with self service tills. This is intimidating for many especially elderly and those using wheelchairs as the room around them and the automated use of it is a barrier to those shoppers who need to speak to a cashier and have someone patient to help them at checkout. I'm also concerned about the density of the housing plans. I sense this won't be the green paradise promised on the plans, but a dense area of blocks only. I don't have issue with the area having green parks put into it and maybe some more shops providing employment and maybe a centre for the existing community to use, but these plans seem a huge ask for local people and will disrupt the road network for those who use the major road into London that is Finchley Rd. I also will not be able to use NW1 Sainsbury as the car park is very tight for me to park in and use with my mobility issues, I certainly don't want to take the elderly there. The other one is Ladbroke Grove, quite a bit further out from my address in West End Lane, adding more time and more fuel to my journey, thus adding to increased air pollution & costs. The next is Sainsbury in Edgware, even further out and plans ahead to reduce the size of that supermarket have started with digging up the car park.

So I fully oppose any plans of this redevelopment as it is and suggest this is rethought for existing residents nearby. The developers, Landsec have used underhand tactics to try to get more support by sneakily posting a pre written template targeting young people on social media who have no connection to the area at all. Labour council want this too with scant regards to anyones life being affected. Camden council have not fully consulted with letters or surveys regards this, otherwise I would have received them and opposed. The only petition I signed opposing this in was last May, so did my son, he's studying engineering, the plans were presented in his class as a disaster by construction engineering tutors. I really think this whole planning application needs a thorough rethink.

I look forward to hearing about any other reviews of the plans or surveys to oppose and I dread the plans going ahead. Which will leave many isolated in the local area from this side of Finchley rd to the other.

My regards

Helen Mandley

From: Aidan O'Hare

Sent: 27 October 2022 14:08

To: David Fowler

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

Aidan O'Hare

E82FQ

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,

Aidan O'Hare