

From: Lucilla Garner  
Sent: 20 March 2022 20:09  
To: David Fowler  
Subject: O2 Masterplan (2022/0528/P)

Dear Mr Fowler

I have lived in West Hampstead for over forty years and have appreciated the scale and character of the area. I was very alarmed by the proposal to build dense high-rise apartments in the area between Finchley Road and West End Lane behind and including the O2 Centre.

The proposal is completely inappropriate for a low-rise area which is already under strain with regard to services and parking. The project seems to have been planned first and foremost for maximum profitability for the developers. The council surely should give very serious consideration to protecting the character of the area and the lives and expectations of its loyal residents.

I hope the council will reconsider and significantly reduce or hopefully reject this ill considered and totally disproportionate plan.

Yours sincerely

Lucilla Garner

From:  
Sent: 20 March 2022 19:58  
To: David Fowler  
Subject: O2 Masterplan (2022/0528/P)

Dear Mr Fowler,

I write to register my serious objection to the proposed development of the O2 centre and area.

I have already submitted objections at various stages. It would seem that the proposal has drawn a considerable level of criticism from locals, but the Council turns a deaf ear.

My key points are:

The high-rise high-density flats are totally out of keeping with the area, which is low-rise and with a good proportion of green in the form of gardens, greens, and tree-lined streets

There is no adequate allowance for affordable accommodation.

The development would put a colossal strain on services and transport and the proposals are woefully inadequate in addressing these important infrastructure concerns.

The equation of proposed resident numbers to medical, police, education, and social services is untenable.

I hope that this and the numerous other objections you receive will be heeded and the local residents' concerns be taken fully into account in adapting the proposal to something that is an illustration of good, balanced, sustainable civic planning.

Yours,

Philippe Garner  
17 Lyncroft Gardens  
LONDON NW6 1LB

From: Faisal Mian  
Sent: 20 March 2022 19:12  
To: David Fowler  
Subject: Objection to O2 redevelopment

Dear David,

I want to register my objection to the redevelopment and addition of residential units to the area without any plans to increase ancillary services. Putting so many flats here would put pressure on transport, schools, GP surgeries etc. I have looked into the arguments for and against and am strongly opposed to the redevelopment.

I live at 43 Arkwright Road, NW3 6BJ.

Kind regards,  
Faisal Mian

**From:** Vladimir Sotskov  
**Sent:** 20 March 2022 18:59  
**To:** David Fowler  
**Subject:** Objection to planning application for O2 Centre

Dear Mr. Fowler,

Please accept this e-mail as expression of my strongest objection to the planning application for the O2 centre. I am appalled that the council is still considering this planning application given strong objections from the community making use of the amenities at O2 centre and in general from people living in the area.

My objections are based on the following considerations:

### **Tall Buildings**

When building tall building the following should be taken into account

- Where harm is done to heritage assets, there must be a “clear and convincing justification”. The application if implemented will do significant harm to the surrounding conservation areas without such a justification.
- 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 in capacity and limited in access.

In general, this area is not suited to high-rise buildings. While Camden has been derelict in not designating areas as suitable for tall buildings 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.

### **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:

- They are low- and medium-rise, with the most typical building being three storeys above ground with a lower ground.
- 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” 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.

### **Car parking**

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

### **Loss of large supermarket**

The large supermarket currently provided by Sainsbury’s is an important destination for shoppers across north-west Camden, being the largest supermarket in the area. In the absence of being able to park at the site, Sainsbury’s have been clear that they do not intend to take on a large store. This makes the commitment to provide a supermarket meaningless, as there is both a quantitative and qualitative difference between large and small supermarkets. The failure to provide a large supermarket or DIY merchant on site would lead necessarily to trips being made by Camden residents to Brent Cross or similar locations: increasing, rather than reducing, traffic and climate change impact. The loss of parking therefore will lead necessarily to harm to the town centre, make the amenities provided for in the outline permission unviable, and harm mitigation and prevention of climate change, and thus should be refused.

**Community facilities**

As well as commercial premises that would be harmed by the application, the commitments on community facilities are insufficiently strong.

Given the above consideration the application for re-developoment of the O2 Centre must be refused.

Kind regards,  
Vladimir Sotskov

**From:** Jason Peacock  
**Sent:** 20 March 2022 18:52  
**To:** David Fowler  
**Subject:** Objection to Planning Application 2022/0528/P

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

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

### **Overbearing height, mass and form**

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

Camden's Local Plan policy A2 requires a minimum open space of 9m<sup>2</sup> per occupant, implying an open space of 40-45,000 m<sup>2</sup>. Landsec's proposal totals 15,500m<sup>2</sup> which is just one quarter of Camden's own policy requirement in an area that is officially green-space deprived.

### **Overshadowing and Loss of light to neighbours**

Skylight, sometimes known as diffuse skylight, is diffused all around us even on cloudy days, whilst sunlight is the light which comes directly from the sun on clear days. BRE define daylight as a combination of skylight and sunlight, adding, "The quantity and quality of daylight inside a room will be impaired if obstructing buildings are large in relation to their distance away". In a British context, skylight is the more important component. A loss of view is not a valid planning objection but the 'right to light' of nearby neighbours to the north of this scheme is protected by the Rights to Light Act 1959.

### **Layout and density of building**

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

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

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

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

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

Construction also has a significant and negative impact on local air quality and potentially public health if it is not carefully managed. Construction activity is responsible for 4% of NO<sub>2</sub> emissions, 24% of PM10 emissions and 9% of PM<sub>2.5</sub> emissions in Camden.

### **Increases Pressure on Infrastructure, Utilities and Community Assets**

Where is the significant and long overdue increase in medical resources in West Hampstead to reflect the needs of 5000+ new users? NHS England published guidance in February 2018, requiring extended access to GP services, including at evenings and weekends, for 100% of the population by 1 October 2018.



Access to basic health and dental care for local residents has diminished not increased.

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

### **Impact on Conservation Areas and Heritage Assets**

The O2 site is bordered by five conservation areas:

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

In point 3.2.2 of the FG&WH Neighbourhood Plan it states: 'The height of new buildings shall have regard to conservation and respect the proportion, scale, massing and rooflines of existing buildings in their vicinity and setting. In all development there shall be a clear presumption in favour of preserving the distinct character and appearance of the Area, as well as the views across it.'

In observations, posted on the O2 planning application, Historic England comments: *'The buildings on the site are substantially greater than that found within the conservation areas and would appear in some views from within them and out of them. The volume and scale of the development means that there is a harmful impact to designated heritage assets through development within their setting.'*

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

### **Politically motivated elimination of private transport**

The scheme objective that "The impacts of car parking should be designed out" reveals a socialist utopian ambition to eliminate private transport. The intended outcome is for all 'citizens' to become wholly dependent upon state provided transport (TfL!) and have no alternative (except walking or cycling).

Under UK net-zero plans, all Internal Combustion Engine vehicles will be banned from 2030. However, Electric Vehicles will rightly not be banned. Eliminating private transport in Camden is politically motivated and denies residents their legal rights to private transport. This will also impact Camden

and London's economic and labour market flexibility and overall will reduce growth and impact employment in Camden.

**From:** Tanya Luthra  
**Sent:** 20 March 2022 18:52  
**To:** David Fowler  
**Subject:** Objection to the O2 flats plan

Dear David,

As a Hampstead resident - I live on 43 Arkwright Road, NW3 6BJ - I am strongly opposed to the plan to redevelop the O2 Center. My family has used the facilities at the center extensively, from the gym where my kids learnt to swim, to shopping at Sainsbury and homebase, go attending gymboree classes as infants. The parking facilities are extremely convenient, and the cinema is visited by all of us regularly. The plan to add 1800 new flats will lead to a huge population increase in the area, with no extra facilities to support the growth. We will need extra parking spots, health surgeries, schools, supermarkets, public transport, etc. It is unfair to existing residents to take away existing community space / facilities and replace them with an influx of new residents that will compete for already stretched remaining facilities/resources. I'm all for increasing housing but it needs to be done responsibly with a proportionate increase in supporting infrastructure.

I really hope you take the view of us local residents into account.

Thanks  
Tanya

Tanya Luthra

**From:** Michael Fletcher  
**Sent:** 20 March 2022 17:16  
**To:** David Fowler  
**Subject:** O2 Masterplan (2022/0528/P)

We object to the current O2 Centre application.

Although it is not in a conservation area, also of relevance are the Fitzjohns & Netherhall, Belsize, South Hampstead, and West End Green conservation area statements, which protect the areas surrounding the site.

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

While Camden has not designated anywhere in the borough as suitable for tall buildings, it would be reasonable to assume that if it did, it would designate this area as unsuitable. This is based on the factors specified in paragraph C of the Policy, namely

- 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.
- 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 in capacity and limited in access.

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

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

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

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

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

## **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:

- They are low- and medium-rise, with the most typical building being three storeys above ground with a lower ground.
- 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 those 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” 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. It should therefore be refused.

### **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.

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

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

- Policy H4 specifies a balance within the affordable housing component of 60-40 between social-affordable and intermediate, which this barely scrapes, being exactly 60% social affordable by both habitable rooms and floor areas.

- Policy H4 specifies that London Affordable Rent is a ‘social-affordable’ rent level. 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 refused.

## **Car parking**

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 reproviding 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’.

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 always

applying on a permanent basis, rather than just within controlled hours, as had been the case before 2020. This has put greater importance on the car park for shoppers at commercial premises other than the redevelopment site. the loss of car parking should therefore be resisted.

There are other areas which benefit from the use of the carpark such as JW3, and they will suffer as well.

### **Loss of large supermarket**

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

This makes the commitment to provide a supermarket meaningless, as there is both a quantitative and qualitative difference between large and small supermarkets. For example, smaller branded supermarkets are permitted to charge higher prices than larger supermarkets of the same brand (which costs up to £320 extra a year for the same products). Furthermore, the failure to provide a large supermarket or DIY merchant on site would lead necessarily to trips being made by Camden residents to Brent Cross or similar locations: increasing, rather than reducing, traffic and climate change impact.

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

### **Community facilities**



As well as commercial premises that would be harmed by the application, the commitments on community facilities are insufficiently strong. The development at Kings Cross promised health facilities in identical terms, but 18 years later, there is still no GP's surgery there: leading to nearby surgeries being overwhelmed.

Policy C1 of the Local Plan states that Camden "will support the provision of new or improved health facilities, in line with Camden's Clinical Commissioning Group and NHS England requirements". Policy 10 of the Fortune Green & West Hampstead Neighbourhood Plan says that there should be additional "primary health care facilities, particularly in or near the West Hampstead Growth Area".

However, despite the growth of the population, there is no health provision within the detailed application for the site (i.e. the first part to be developed). There has only been a vague statement that a healthcare facility may be provided in the non-detailed, outline permission (i.e. the later stages).

This commitment is insufficiently strong, as the failure to provide facilities in King's Cross shows. Furthermore, even if it is eventually delivered, unlike King's Cross, there would be 10-15 years between 700 flats being built in the initial part of the development and the surgery or other facilities being opened in the last stage. This would put unbearable strain on local services in that time.

Any development that does not include the provision of a GP surgery in the detailed part, which will be built first and which is the strongest protection, must be resisted. As this does not, it should be refused.

Kind Regards

Michael Fletcher

**From:** Penny Jones  
**Sent:** 20 March 2022 16:44  
**To:** David Fowler  
**Subject:** Planning Application 2022/0528/P O2 Centre Site

Dear Mr Fowler,

I am writing to raise strong objections to the proposed application for the redevelopment of the O2 Centre.

Like many other local residents, I have legitimate concerns about the density of high-rise tower blocks being proposed, when the local area has been subjected to an onslaught of development over the last few years resulting in already over-crowded pavements, public transport, shops, community facilities such as doctors surgeries, dentists, etc

No one is listening to the local residents and the tireless objections being raised. The response from the developer is to submit application after application in an attempt to bulldoze the scheme through regardless of the mass local objections.

The government issues arbitrary advice to increase house building and sadly no common sense is applied - no consideration given to the need to upgrade infrastructure BEFORE development, no consideration given to the pressure already on community facilities and GP surgeries where appointments are already hard to come by. No consideration to the amount of flats sitting empty in high rise tower blocks built over the last few years. No consideration given to the fact that there's already a mass development of flats underway on the old Travis Perkins site on West End Lane, which will only make the queues for the tube station and packed pavements in the area even worse.

We're penalised for owning a car and yet the proposal does away with a DIY store, supermarket, gym, cinema etc all of which we can currently walk to. If we have heavy shopping then being able to drive and park is essential especially for the elderly or people with children.

PLEASE can Camden think about what human beings need for healthy sustainable living - open space, green space, trees, community facilities, adequate infrastructure, supermarkets, daylight/sunlight not shaded wind tunnel paths between high rise buildings... PLEASE don't just think about 'box-ticking' to meet the government arbitrary house building quotas or Section 106 and CIL payments - think long term about how development of the area is going to impact the community.

Significant harm is being done by over development of the area and I just wish Camden would listen.

Regards,  
Penny Jones  
Broomsleigh St, NW6 1QQ

**From:** G CLARE-HUNT  
**Sent:** 20 March 2022 16:02  
**To:** David Fowler  
**Subject:** O2 Centre

Dear David Fowler

We are writing in regard to the proposed development of the O2 Centre and do so on the basis of the following points.

1. Camden has rightly taken pride in its protection of its Conservation areas and this development will conflict with those strongly set standards.
2. In reinforcement of the above point, the bulk, height and density of the proposed development are in alarming conflict with the surrounding area.
3. As the Council will be aware, Sainsbury's is the largest supermarket in the area. The loss of the car park which serves the supermarket would have a very detrimental effect on the viability on this amenity. All large supermarkets have car parks and provide trolleys for goods to be transferred into a car. Such a quantity of goods could not be taken on public transport.
4. In addition, should this development be granted permission, it would impose immense pressure on local services. And to address Camden's position on the environment, the increase in traffic alone would be detrimental to the green and sustainable ideals set down by the Council.
5. Hampstead Heath is a destination for health and leisure opportunities for many people and not just those inside the Borough. Should permission be granted for the over-development of this site, it could very likely set a precedent

for other such developments within even greater proximity to the Heath which would cause irreparable damage to the 'lung' of the Heath.

We therefore urge the Council to reject this application.

Melvyn and Gabriel Bragg

**From:** Anna Bonderenko  
**Sent:** 21 March 2022 00:38  
**To:** David Fowler  
**Subject:** Objection to O2 development

Dear David,

I am a resident of Hampstead and live within easy walking distance of the O2 Centre.

I am deeply concerned by the proposed development, not the least of which is the lack of transparency on the part of Camden Council about the entire process.

But more to the point, my concerns fall into the following areas:

### **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."

While Camden has not designated anywhere in the borough as suitable for tall buildings, it would be reasonable to assume that if it did, 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.
- 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 in capacity and limited in access.

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

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

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

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

## **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:

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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:

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ours) on the West End Green or South Hampstead conservation areas.

- “Has regard to the impact on local views” identified in A11 of the Neighbourhood Plan. This designates views southwards, out of the Neighbourhood Plan Area across South Hampstead: views that would be obliterated by the development.

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. It should therefore be refused.

### **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.

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

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

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

The development falls far short of the affordable housing target, and – 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 refused.

## **Car parking**

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 reproviding 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'.

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

## **Loss of large supermarket**

The loss of a large car park will have a particularly harmful effect on the sustainability and viability of amenities. The large supermarket currently provided by Sainsbury's is an important destination for shoppers across north-west Camden, being the largest supermarket in the area. In the absence of being able to park at the site,

Sainsbury's have been clear that they do not intend to take on a large store.

This makes the commitment to provide a supermarket meaningless, as there is both a quantitative and qualitative difference between large and small supermarkets. For example, smaller branded supermarkets are permitted to charge higher prices than larger supermarkets of the same brand (which costs up to £320 extra a year for the same products). Furthermore, the failure to provide a large supermarket or DIY merchant on site would lead necessarily to trips being made by Camden residents to Brent Cross or similar locations: increasing, rather than reducing, traffic and climate change impact.

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

### **Community facilities**

As well as commercial premises that would be harmed by the application, the commitments on community facilities are insufficiently strong. The development at Kings Cross promised health facilities in identical terms, but 18 years later, there is still no GP's surgery there: leading to nearby surgeries being overwhelmed. Read more [here](#).

Policy C1 of the Local Plan states that Camden "will support the provision of new or improved health facilities, in line with Camden's Clinical Commissioning Group and NHS England requirements". Policy 10 of the Fortune Green & West Hampstead Neighbourhood Plan says that there should be additional "primary health care facilities, particularly in or near the West Hampstead Growth Area".

However, despite the growth of the population, there is no health provision within the detailed application for the site (i.e. the first part to be developed). There has only been a vague statement that a healthcare facility may be provided in the non-detailed, outline permission (i.e. the later stages).

This commitment is insufficiently strong, as the failure to provide facilities in King's Cross shows. Furthermore, even if it is eventually delivered, unlike King's Cross, there would be 10-15 years between

700 flats being built in the initial part of the development and the surgery or other facilities being opened in the last stage. This would put unbearable strain on local services in that time.

Any development that does not include the provision of a GP surgery in the detailed part, which will be built first and which is the strongest protection, must be resisted. As this does not, it should be refused.

Thank you for your attention to my email and to this matter.

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