

From: Tibor Gold
Sent: 13 August 2022 13:16
To: David Fowler; Planning Planning
Subject: Ref: 2022/0528/P

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Dear Mr Fowler and colleagues in Planning

I have received and reviewed a copy of the Planning Representations from the Confederation of Local Community Groups. I completely agree with it. I wish here to add my own objections on the same grounds.

Tibor Gold

Sent from my iPhone, Tibor

From: Peter Lane
Sent: 13 August 2022 11:23
To: David Fowler
Cc: Planning Planning
Subject: ref: 2022/0528/P

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Dear Mr Fowler,

ref: 2022/0528/P O2 centre redevelopment

Having now received and reviewed a copy of the Planning Representations from the Confederation of Local Community Groups, please accept my own objections to this planning application which are fully represented by the Confederation's detailed objections which have already been submitted.

I am particularly dismayed by the cramming of all these tall buildings into such a small site with minimal gaps between each structure... I suggest that at least 30-50% of the buildings should be removed so that the development feels genuinely spacious. In addition I also object to the limited size / floor area of each flat where the accommodation is cramped and there is no roominess or space for storage.

Finally I object to the demolition of The O2 centre which is a valuable local amenity.

Yours
Peter Lane

From: Ruth Foxman
Sent: 13 August 2022 10:23
To: David Fowler; Planning Planning
Subject: O2 development

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Dear Camden, I totally agree with the argument put forward by the NDF. Ruth Foxman

From: Jonathan Isaacs
Sent: 12 August 2022 19:28
To: Planning Planning
Subject: O2 Centre Planning objection

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"Dear Sirs,

ref: 2022/0528/P

Having now received and reviewed a copy of the Planning Representations from the Confederation of Local Community Groups, please accept my own objections to this planning application which are fully represented by the Confederation's detailed objections which have already been submitted.

I have also written to Mr. Fowler with the same objections.

Yours faithfully,

Jonathan Isaacs

From: Ginny Ejee
Sent: 12 August 2022 19:00
To: David Fowler; Planning Planning
Subject: Ref: 2022/0528/P

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Dear Mr Fowler,

Ref: 2022/0528/P

Having now received and reviewed a copy of the Planning Representations from the Confederation of Local Community Groups, please accept my own objections to this planning application which are fully represented by the Confederation's detailed objections which have already been submitted.

Yours sincerely,
Ginny Ejee

Sent from [Mail](#) for Windows

From: Pamela Frazer
Sent: 12 August 2022 18:07
To: David Fowler; Planning Planning
Subject: Re: Finchley Road, O2 centre development scheme.
Ref:2022/0528/P

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Dear Mr Fowler,

Ref: 2022/0528/P

Having now received and reviewed a copy of the Planning Representations from the Confederation of Local Community Groups, please accept my own very strong objections to this planning application which are fully represented by the Confederation's detailed objections which have already been submitted.

Yours truly,

Pamela Frazer

From:
Sent: 12 August 2022 17:53
To: David Fowler; Planning Planning
Subject: O2 and adjacent car park building plan - objection

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Dear Mr Fowler,

ref: 2022/0528/P

Having now received and reviewed a copy of the Planning Representations from the Confederation of Local Community Groups, please accept my own objections to this planning application which are fully represented by the Confederation's detailed objections which have already been submitted. I have read the documents and agree with most of their conclusions about the excessive density and size of the development.

Best wishes
Richard Meares

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

From: Eric Peel,

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 dominant material in the conservation area, and both palette and materials are traditional in nature.

Furthermore, while it is not located within a Conservation Area, is it located in the Fortune Green & West Hampstead Neighbourhood Plan Area. This contains ‘Conservation Area-like’ protections in Policy 2, namely development that:

“Is human in scale”

“Has regard to the form, function, structure, and heritage of its context, including the scale, mass”

“Is sensitive to the height of existing buildings”, including that tall buildings should “avoid *any* negative impact” (emphasis ours) on the West End Green or South Hampstead conservation areas.

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

Given the above requirements, more careful consideration should be given to the impact on conservation. Instead, the developer has acted as though it being located a few metres outside these conservation areas means that it does not have to have regard to conservation. So, another of many reasons that it should therefore be resisted.

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

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

Car parking and continuing amenities

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

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

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

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

As a long time local resident, the O2 Centre fulfils an essential function for shoppers at both the O2 Centre and Homebase. Furthermore, Transport for London has recently designated the red route along Finchley Road as applying at all times permanently, rather than just within controlled hours, as was the case before 2020. This has put even greater importance on the car park for shoppers at commercial premises other than the redevelopment site, elsewhere in the Finchley Rd 'Town Centre'.

Viability of amenities

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

This makes the commitment to provide a supermarket meaningless, as there is both a quantitative and qualitative difference between large and small supermarkets. For example, smaller branded supermarkets are permitted under agreement with the Competition & Markets Authority to charge higher prices than larger supermarkets of the same brand. Furthermore, the failure to provide a large supermarket or DIY merchant on site would lead necessarily to trips being made by Camden residents to Brent Cross or similar locations: increasing, rather than reducing, traffic and climate change impact.

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

Lack of Affordable housing

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

Even though Camden has admitted that few developments within the borough hit this target, it is still the policy target, and divergence should only be justified by compensatory factors. Such exceptions with little justification make a mockery of all these plans, and the London Planning Authority should not accept being short-changed.

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

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

Policy H4 specifies that London Affordable Rent is a ‘social-affordable’ rent levels. However, it is clearly the least preferred of social-affordable (being on average 30%-55% higher than social rent and being available only to households that are eligible for those – lower – social rents). All social-affordable units proposed are London Affordable Rent: thus meaning the offer is the least preferred under the Local Plan.

The development falls far short of the affordable housing target, and – furthermore – provides the bare minimum in both mix of affordable housing and affordability of that housing in a way that might compensate or mitigate that. It should therefore be resisted.

Completely inappropriate Housing Mix

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

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

The Dwelling Size Priorities Table is reproduced here:

Table 1: Dwelling Size Priorities

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

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

	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

Best regards,

E. Peel

From: Peg Armburg
Sent: 23 August 2022 14:28
To: David Fowler; Planning Planning
Subject: OI2 development plans

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Dear Mr Fowler,

ref: 2022/0528/P

Having now received and reviewed a copy of the Planning Representations from the Confederation of Local Community Groups, please accept my own objections to this planning application which are fully represented by the Confederation's detailed objections which have already been submitted.

Regards
Peg Armburg

From: Adrian Barrett
Sent: 13 August 2022 17:18
To: David Fowler; Planning Planning
Subject: 2022/0528/P

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Dear Mr Fowler,

I've recently looked at the planning submission for the O2 site at Finchley Road. Whilst there are many elements that are positive (retaining shops at the Finchley Road end, aligning Blackburn road to be a linear path to Finchley Road, new public squares/parks, etc...), I am most concerned by the residential design - a series of massive tower blocks is out of character with the residential areas that surround the site (and Hampstead more widely), both in regards to height but also style/look. Are Camden Planning able to set height guidance and design principles to make the residential properties fit-in with the area.

I know that the Heritage Square development has tower blocks, but no one in the area welcomed these and they stand out as ugly. West Hampstead is a charming and sought-after area, but these developments are trying to turn it into the Docklands - with a series of high-rise towers lacking local character, as a result of developers focused on squeezing a huge amount of residential property into a small footprint.

Thanks,
Adrian Barrett