
<u>Index</u>	<u>Paragraph number</u>
Introduction	1
Land use	9
Design Quality	12
Summary of Fundamental Objections	25
Single Aspect Homes	29
Shadowing Impacts	32
Public realm, green space and connectivity	35
Green space deficiency	37
Connectivity	42
Public Realm	43
Urban Greening	45
Town Square	46
Tall Buildings: Social & Environmental / Sustainable Impact on Future Residents	49
Key Image (1)	51
Key Image (2)	54
Heritage Impacts	55
Housing need and affordability	65
The O2 Centre	78
Social Infrastructure	86
Summary	88

Introduction

1. This review of the above referenced Planning Application, has been commissioned on behalf of a confederation of all the local community groups in the four Conservation Areas and other adjacent areas around the site, including:
 - a. the Fortune Green and West Hampstead Neighbourhood Forum,
 - b. WHAT (West Hampstead Amenity & Transport),
 - c. WHGARA (West Hampstead Gardens and Residents' Association),
 - d. the Redington Frognal Neighbourhood Forum,
 - e. the Redington Frognal Association,
 - f. the Netherhall Neighbourhood Association,
 - g. RMRG (Rosemont Mews Residents' Group),
 - h. CRASH (the Combined Residents' Associations of South Hampstead),
 - i. the Belsize Society,
 - j. MARA (Menelik area Residents' Association),
 - k. GARA (Gondar and Agamemnon Residents' Association),
 - l. MILAM (Maygrove, Iverson, Loveridge, Ariel, Medley),
 - m. and in support of the Fortune Green and West Hampstead neighbourhood plan which includes the O2 Centre site.

Each of these organisations may also submit additional representations specific to their own circumstances and communities.

2. Please note: the planning application itself consists of over 100 documents, and over 7000 pages. More than 16 of the largest professional organisations and consultants in the UK have been involved in preparing the design and the application (page 5, DAS pt1), probably requiring more than 50 man-years of time. By comparison, the community has had but a few months of time to assess and submit our responses, initially all the planning consultants who we approached for help refused to review a Landsec application, and few individuals – indeed no members of the community - will have had the time, skills, and qualifications to fully read and understand the application in every detail: indeed many/most casual observers will have been misled by the prejudicial “marketing-speak” which has been the foundation of the consultations, and of much of the application. We have therefore focused below on addressing the key issues which the community find completely unacceptable, and we wish to point out that we have not had the time or manpower to address every specific document, mistake, or mis-representation within those 7000 pages: indeed, it simply isn't possible in 30 pages to identify and rebut every single issue within a 7000 page application .

Therefore, since we feel that this application is too egregious to be adapted in any meaningful way and that we are fundamentally asking for it to be withdrawn or rejected so that the basic concepts can be reconsidered in genuine partnership with the community, we also ask that, should the Planning Dept feel that we have failed to make our case in any particular area, we would be grateful for that immediate feedback so that we can further address any particular issues in question.

We also wish to share our general disappointment that so much time, money, and energy, has been invested by the developer in such a completely inappropriate concept and that, the “so-called community consultations” were so deliberately chosen to discard the community’s fundamental concerns and feedback. No doubt this mistaken investment will weigh heavily on the developer’s mind in resisting fundamental change: we trust this will not be a material consideration to the planning assessment of this application, and the subsequent planning decisions.

3. Para 2.9 of the pre-application advice confirms: “The whole site is included in the Fortune Green and West Hampstead Neighbourhood Plan Area. The policies in this plan have equal weight to the local plan policies.” The FGWHNP writes: “The height, bulk and massing of any new buildings will be an important issue. Any new development will need to respect, and be sensitive to, the height of existing buildings in their vicinity and setting (see Policy 2) . . . Any new development should also seek to be of the highest quality design” and this policy is further emphasised by re-quoting in the SPD 4.44.
4. Based on the Fortune Green and West Hampstead Neighbourhood Plan, the Fortune Green and West Hampstead Neighbourhood Forum asserts that the current application fails to respect and be sensitive to the height of existing buildings in their vicinity and setting (ref Policy 2) and, in conjunction with all the neighbouring community organisations, requests that the application be withdrawn or rejected, pending a future redesign in compliance with the Neighbourhood plan, and in genuine cooperation with the FGWHNF and the adjacent community.
5. We welcome this opportunity to inform proposals for the redevelopment of the O2 Centre site. We share the applicant’s view that the “site is an outstanding mixed use regeneration opportunity” (para 1.10 Planning Statement) and strongly support the principle of redevelopment. It is a highly accessible location which could be more effectively used, including making much better use of the significant area currently dedicated to parking and by providing new and improved cycling and walking connections. However, as referenced below, a successful repurposing of the site will also importantly retain and improve the O2 Centre.
6. The significance of the site is recognised in the unusually rich planning policy context developed to inform its future, including a three tier development plan (London Plan, Local Plan, neighbourhood plan) and a recently adopted Supplementary Planning Document. This policy context is united in its ambition for the site to provide significant mixed use development, responsive to its context, designed to a high quality, providing for the full range of local and wider social and economic needs, offering new and improved connections and bringing significant benefits for wildlife and public health while achieving high sustainability standards.

7. These representations establish why the current proposals singularly fail to realise the opportunity of this strategically important site and conflict with the agreed planning policy context. They address a range of considerations of interest to local residents in the context of the planning policy context and conclude that the proposals should emphatically be rejected. The community (as represented by comments on the application and through their representative community organizations) also asserts that the owner may have organised a series of "tick-box" consultations, but it has been clear from the outset that, by the time the consultations began, the owner had a fixed vision of their intention and solution and took virtually no account of the community's wishes. By contrast, from the beginning, the community has expressed support for the principle of development and offered to work with the owner's architects to develop a solution which could serve the owner and the community also. This report asserts that the current application is so defective that it should be emphatically rejected and the community continues to offer cooperation to develop a suitable alternative concept, should the owner accept in good faith.
8. It is also worth giving consideration to the nature of the site itself: although this site was an industrial railyard within the 19th century neighbourhood of 4 residential conservation areas (thus preventing uniform development to match the adjacent conservation areas in the past), this development now should therefore be an opportunity to repair that damage, not to increase this damage through even worse insults to the community now, with excessive heights, density, poor design, and insufficient green space amenity.

Land use

9. The planning policy context for the O2 Centre site is clear about the importance of mixed-use regeneration. For the area of the site beyond the O2 Centre itself the development plan policy context is:
- London Plan – identified as part of a strategic regeneration area combining commercial and residential uses
 - Camden Local Plan – development of the West Hampstead Interchange to provide a "mix of uses"; O2 Centre car park to provide an "appropriate town centre mixed use development, including housing, retail, community uses and open space". The emerging site allocation also supports a "mix of uses" to deliver a "new place"
 - Fortune Green and West Hampstead neighbourhood plan – supports "a mix of uses, including new housing, employment, town centre and public/community uses"

10. The recently adopted West End Lane to Finchley Road Supplementary Planning Document provides the most detailed framework. It includes the O2 Centre and seeks “comprehensive redevelopment of this land to create a new place”, including residential, retail, leisure, workspace and community uses.
11. The proposals are in direct conflict with this planning policy context. They would regenerate the site almost entirely for residential use. Residential use would comprise over 170,000 sq m (89%); commercial uses under 20,000 sq m (11%) and local community uses a tiny 270 sq m (0.1%) of the built development. This fails to match up to the “outstanding mixed used regeneration opportunity” envisaged by the applicant. It will singularly fail to provide a “new place”.

Design Quality

12. The planning policy context is for a design-led approach to optimising use of the site, informed by its context:
 - London Plan – “*design-led approach to determine the optimum development capacity of sites*” and “*understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making*” Policy GG2 and “*all development must make the best use of land by following a design-led approach that optimises the capacity of sites*” Policy D3
 - Camden Local Plan - “*the Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by [inter alia] supporting development that makes best use of its site, taking in account quality of design, its surroundings, sustainability, amenity, heritage, transport, accessibility and any other considerations relevant to the site*” Policy G1
 - Fortune Green and West Hampstead neighbourhood plan – “*All development shall be of a high quality of design, which complements and enhances the distinct local character and identity of Fortune Green and West Hampstead...ff*” Policy 2. “*Development in the WHGA [West Hampstead Growth Area] shall, where appropriate and viable: i. Be in keeping with and enhance the character of the wider area*” Policy 4. The Fortune Green and West Hampstead Neighbourhood Forum asserts that the current application fails to respect and be sensitive to the height of existing buildings in their vicinity and setting and, in conjunction with all the neighbouring community organisations, requests that the application be withdrawn or rejected, pending a future redesign in compliance with the neighbourhood plan, and in genuine cooperation with the Forum and the adjacent community.
13. The development proposals singularly fail to take a design-led approach, are too oblivious to their context and significantly overdevelop the site.

14. The result is a scheme of overbearing height, mass and form which is alien to its context and built at such an extreme density that its compromised functionality cannot be addressed through the quality of architecture and design. We strongly dispute the Townscape, Heritage and Visual Impact Assessment's conclusion that the scheme will "significantly enhance the townscape character". Far from respecting and enhancing its context, we believe the scheme presents a jarring contrast with the elegance and density of the surrounding neighbourhoods, which are already substantially of higher density than the Camden average.
15. Some of these issues were recognised in the pre-application advice:
- *"It is generally felt that the building heights and massing are ambitious. The height and massing in relation to the quantum of open space, could create an overbearing and unwelcoming environment. This is particularly the case in the centre of the site where there is a more residential character. Reducing the overall height of the buildings and creating more breathing space around them could create a more 'human scale' that would improve character and a positive sense of place. The quality of the public space would also be enhanced."* (paragraph 7.8).

Although the heights have been slightly reduced in the application since, the reality is that this comment is as true of the current application as it was then and even reducing the heights slightly more, would not change the "overbearing and unwelcoming environment" or provide any improved character, improved quality of public space, or a positive sense of place.

16. Camden Policy D1 sets the following design requirements and commits to resisting development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. This application offers 1 neutral criterion, and fails on 14 of the 15 criteria, and must therefore be resisted under the plan policy.

Policy D1 Design – assessment of proposals		
* Please see images in paras 51-54 below		
The Council will seek to secure high quality design in development.		
The Council will require that development:		
a. respects local context and character;	fail	due to excessive height & poor design*
b. preserves or enhances the historic environment and heritage assets in accordance with Policy D2	fail	due to excessive height & poor design*
c. is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;	fail	traditional concrete and brick construction is in contradiction to sustainability, and the application is absent significant climate change mitigation
d. is of sustainable and durable construction and adaptable to different activities and land uses;	fail	Standard concrete and masonry construction and no effort to propose really-sustainable construction. Fundamentally poor design as regards both land use and green space.*
e. comprises details and materials that are of high quality and complement the local character;	fail	the design is a hackneyed sub-pastiche of the local character

f. integrates well with the surrounding streets and open spaces, improving movement through the site and wider area with direct, accessible and easily recognisable routes and contributes positively to the street frontage	fail	the site is overfilled with blocks in a "Soviet-style" proximity*. The east-west route is described as a "linear park" and, in reality, is little more than a narrow path at the foot of 12 storey towers, failing the dictionary definition or any common understanding of a "park" & misleading inexperienced consultants with "sales-speak"
g. is inclusive and accessible for all;	fail	by applying to demolish the O2 Centre and replace it with a wall of apartment buildings along the Finchley Road, the development removes the existing inclusive hub, cuts itself off from the existing community, and takes away any reason the community might wish any access to the site.
h. promotes health;	fail	the consequence of poor site design is insufficient provision & poorly-utilised green space, buildings too close together*, and no significant features to promote health.
i. is secure and designed to minimise crime and antisocial behaviour;	fail	the most important feature of a design to minimise crime and anti-social behaviour is for the residents to feel they have been respected by the design, and ideally to fall in love with the design and the place. This design is about maximising profits and there is no respect and no placemaking to love: "first we shape our buildings – then our buildings shape us" We also note that, in spite of a pre-application consultation with the Metropolitan Police "Design Out Crime Office", the application has failed to listen to their concerns either, and the official Police Response opens with the comment " <i>I cannot support this application in its current form...</i> "
j. responds to natural features and preserves gardens and other open space	fail	instead of trying to maximise the open space, this design fills the site in a Soviet-style proximity, too close together*, & most of the open space has ended up in narrow, overlooked, & unappetising corridors between the buildings: see photos in paras 51-54 below.
k. incorporates high quality landscape design (incl public art, where appropriate) & maximises opportunities for greening for example through planting of trees and other soft landscaping.	fail	having failed to create a significant basic landscape in the site at all, further "high quality landscape design" is an important aspiration but it is essentially irrelevant to this design as it is compromised from the start.
l. incorporates outdoor amenity space;	fail	what little outdoor amenity space is very limited compared to the outdoor amenity space which could be available with a different site concept. Further, Para 10.42 of the Planning Statement confirms that, under this particular design concept " <i>the Proposed Development is unable to meet the full policy requirement in respect to open space</i> "
m. preserves strategic and local views;	fail	by achieving density through a high-rise vs mid-rise concept, this plan is destructive of strategic and local views, and not preserving of them
n. for housing, provides a high standard of accommodation; and	fail	high-rise buildings, too close together, excessively overlooked & overshadowed, & predominantly single-aspect
o. carefully integrates building services equipment.	neutral	

"The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions."

17. Clearly Design is a key issue in considering this application, and we wish to draw your attention to:

“APPEALING DESIGN: The evidence of planning appeals and the need to reject poor and mediocre housing design” - written by Prof Matthew Carmona and Valentina Giordano at The Bartlett School of Planning at UCL and co-sponsored by:

- the Royal Town Planning Institute,
- the Place Alliance (*In 2020, the Place Alliance was selected by UN-Habitat as one of their ‘Inspiring Practices’ for the Compendium of Case Studies that they publish each year. In 2016, the Place Alliance was awarded the Sir Peter Hall Award for Wider Engagement Prize, as part of the Royal Town Planning Institute’s Awards for Research Excellence of that year*)
- the Urban Design Group
- Urban Design Learning
- Civic Voice

Quoting the Foreword here, as an outline summary:

“For decades local planning authorities up and down the country have been reluctant to refuse poorly designed residential and other developments on design grounds. Six perceptions have underpinned this reluctance:

1. Design is too subjective – design has been seen by many as too subjective, potentially opening up planning judgements to challenge.
2. Quantity not quality is prioritised – in the past government guidance has prioritised other factors over design quality, most notably housing supply.
3. Housebuilders are too formidable – pragmatically some authorities have taken the approach that it is better to negotiate and accept what you can get, rather than refuse schemes, given that housebuilders will eventually wear them down and get their own way.
4. Good design takes too long – some believe that negotiation on design takes too much time, time which already stretched planning officers don’t have.
5. Design is an afterthought – practices of determining the principle of development (in an outline application) prior to determining how schemes will be delivered in design terms (in reserved matters) undermine design-based arguments from the start.
6. Costs will be awarded – for all the reasons above, cash strapped local planning authorities worry that refusing on design will open them up to costs being awarded against them at appeal.

Drawing on recent planning appeals data, this report reveals that none of these perceptions are any longer true (some never were).

The *National Planning Policy Framework* (NPPF) was revised on July 20th 2021, and since then has unequivocally stated: “**Development that is not well designed should be refused**” (para. 134). The message to all local planning authorities is therefore that they should have the courage of their convictions and stand up against poor quality residential design wherever it is found.

On the evidence presented in *Appealing Design*, it is time for all local planning authorities to demand better. Poor and mediocre design is no longer good enough. The country desperately needs more housing, but there is no reason why that should be designed to such routinely low design standards. We are blessed, as a nation, with some excellent housebuilders who consistently prioritise design quality. Unfortunately, as the appeals evidence confirms, we are also faced by many that do not, or will only do so when confronted by planning authorities that refuse to sanction substandard designs.

Quite simply local planning authorities should do as government policy asks and reject poor and mediocre housing design. The appeals evidence now supports this position, recognising this vital regulatory function of the English planning system

http://placealliance.org.uk/wp-content/uploads/2022/03/Place-Alliance-Appealing-Design_2022-Final.pdf

18. It is notable that despite a main justification for the development being that “This Site represents one of the largest underutilised low density sites in Zone 2 in London” (para 4.1, Design & Access Statement) no details of the density of the detailed proposals or overall masterplan are provided. The density is excessive and we agree with the conclusions of Camden’s Design Review Panel on 2 July 2021 that “any opportunities to reduce density should be taken” (para 5.2, Design & Access Statement).
19. To put the density of this application in perspective, the proposed density for this site is shown on the following chart, along with the highest density comparisons from “LESSONS FROM HIGHER DENSITY DEVELOPMENT LONDON PLAN DENSITY RESEARCH Report to the GLA Sept 2016” which shows the extreme level of over-development proposed:

	dw	ha	p/ha	p/acre	dw/ha	p/dw
Landsec application	1800	5.7	947		316	3
SALP (Cabinet approved)	950	4.5	633		211	3
Alexandra Road Estate achieved			519	210	173	3
Somers Town Development (CAZ)(average over residential area)			408		136	3
Manhattan CB7			380		221	1.7
Mumbai			369		123	3
Tetuan (Madrid)			289		121	2.4
15th arrondissement (Paris)			283		149	1.9
Manhattan			260		87	3
Sant Andreu (Barcelona)			217		90	2.4
Paris			212		127	1.7
Camden 016E LSOA (SH)			188		89	
Somers Town Development (Central Activity Zone) (average over whole :)			186		62	
Camden 016A LSOA (SH)			178		84	
Camden 017A LSOA (SH)			169		80	
Barcelona			163		70	2.3
Tokyo (special wards)			148		103	1.4
Camden 016C LSOA (SH)			148		70	
West Hampstead/South Hampstead			129		61	
Camden 016B LSOA (SH)			129		61	
Camden Average (@ 2.18)			128		59	
Friedrichshain-Kreuzberg (Berlin)			125		80	1.6
Camden 016D LSOA (SH)			120		57	
8th arrondissement (Paris)			114		57	2
Camden			109		47	1.3
Bukit Merah (Singapore)			109		36	3
<u>Inner London</u>			108		46	2.4
Singapore			59		18	3.2

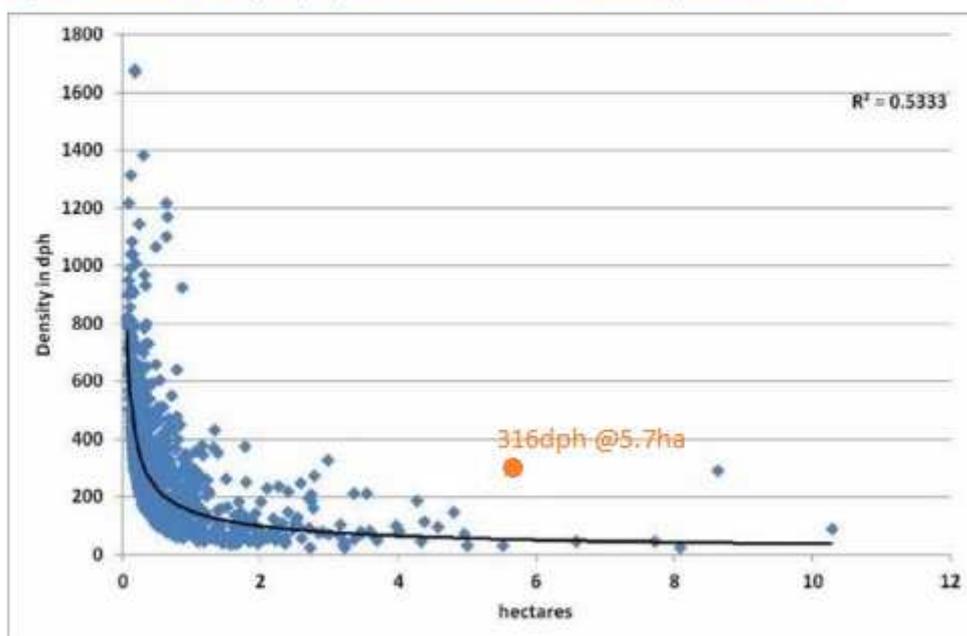
Please also notice that the Somers Town Development is in the Central Activity Zone, whereas the O2 Centre Development is certainly not.

20. This chart below, from the same report, shows all developments in the GLA from 2007-2016: this application is significantly more dense than any other comparable development at that site size and range.

Site size and Density

2.22: Figure 2.8 below, for all schemes of 50+ dwellings completed since January 2007, shows how closely the completed scheme density relates to site size.

Figure 2.8: Residential density in dph by site area in hectares (each diamond represents a scheme)



21. Even on its own terms the architecture is repetitive, poorly detailed and lacks any distinction that relates it to the local context. The different blocks relate poorly to each other not only in distant views but also in the practicality and liveability of the public realm between them. The overall impression is of a ubiquitous, every day, and placeless design that lacks real character or merit and could be found in cities across the world. The attempt to copy brick-colours and banding is a tool lacking in any real architectural vision, and is little more than “architectural wall-paper” signally failing to fulfil Camden’s commitment to the site that this should be “design-led” and “high-quality”
22. There is an existing site typology available in the Alexandra Road & Ainsworth Estate, which was developed in Camden by RIBA Gold Medal-winning architect Neave Brown, and which has left a legacy of an annual architectural award for high-density housing. This typology was described by architectural historian Mark Swenarton in his history of municipal architecture in Camden "Cook's Camden" (2017) **"an architectural resolution unsurpassed not just in social housing in the UK but in urban housing anywhere in the world"**.

-
23. The National Design Guide is a material consideration. It identifies ten characteristics of good design that combine to make high quality, liveable and popular places. In too many ways the approach taken by the proposals is the antithesis of this, offering overbearing, intrusive buildings, overly formalised public spaces and a rejection of the context of the rich and varied surrounding neighbourhoods.
24. The description of the design evolution provided confirms that, fundamentally, the design quality is compromised by the quantum of development proposed for the site. The design process started in the wrong place and so was unable to respond appropriately to its context and resulted in an alien architectural approach. This is the inevitable consequence of the proposals for c1,800 homes being almost double the planned capacity envisaged in emerging site allocation WHI2 (950 homes) and approved by Cabinet in November 2019 and the consequences are shown in the 3D model in para 50 below. There is therefore no policy justification for this quantum of development and Camden's own consultations have confirmed that Camden's housing targets can and will be met with the 950 homes and without the need to damage the social context of the future residents by overdevelopment.
25. To be clear, the primary reason for denying this application for ca1,800 homes, is to fulfil the many assertions in the Camden Plan and SPD that this will be a "design-led" solution of "the highest quality": this proposal fails for the primary reasons (described in more detail below) of:
- a) Excessive and unnecessary height, to the detriment of the future residents and the surrounding conservation areas
 - b) Excessive and unnecessary density, primarily to the detriment of the future residents, but also to the surrounding neighbours due to the poor social design of the development
 - c) Insufficient and poorly utilised usable green space, to the detriment of the future residents, and due to the poor design concept
 - d) The unnecessary and environmentally damaging demolition of the existing O2 Centre, to the detriment of the future residents, the surrounding neighbours, and to the Climate Emergency.
26. In summary, far from being "design-led" or "highest quality", it is clear that this is in fact a plan which is entirely guided by commercial interests instead, and is basically "human warehousing", absent respect for the future residents or for the surrounding communities, and we trust it will be rejected as such, particularly when a high-quality, design-led solution is available.

27. We therefore believe that the failure to reach the necessary specified threshold of “highest quality” should be self-evident in this case and therefore lead inevitably to rejection of this application. We also recognise that there could be some voices which claim it is a concept of “personal preference”. Should this be the case, the community asserts that the developer’s consultations were never open to a serious discussion of alternative concepts but have been unswerving in pursuing this completely unsuitable proposal; and that, when there is such unanimity of a whole community and all local community organizations on such a large and significant site, and where there are proven alternatives available, the democratic decision must again consider the community’s assessment as to quality and suitability as a paramount consideration, as long as the community can offer realistic and proven alternatives which can both meet the Council’s housing needs and the community’s (and we hope the Council’s) assessments of quality.
28. The inadequate design approach is further illustrated by the prevalence of single aspect flats within the proposals and the negative sunlight and shadowing impacts.

Single aspect homes

29. We calculate that 272 (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
30. 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.
31. 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.

Shadowing impacts

32. The scheme also gives rise to significant concerns about the shadowing impact on nearby properties, including more than minor daylight and sunlight alterations to homes in Blackburn Road, Lithos Road, Rosemont Road, Broadhurst Gardens and Nido House (Haywood House). Many of these are identified as “major negative” impacts by the environmental statement accompanying the proposals and we do not agree with the conclusion that they are “acceptable”. The impacts conflicts with the policy context (London Plan Policy D6, “The design of development should provide sufficient daylight and sunlight to new and surrounding housing...”; Camden Local Plan Policy A1, “The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity. We will: a. seek to ensure that the amenity of communities, occupiers and neighbours is protected..... The factors we will consider include....f. sunlight, daylight and overshadowing”).
33. National planning policy on design has been strengthened and it is emphatically clear that “development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design” (para 134, NPPF). These proposals fail this test.
34. The poor quality of design and architecture is especially disappointing given the availability of inspirational local precedents, including the landmark Alexandra Road & Ainsworth Estate, the first post-war council housing estate to be listed.

Public realm, green space and connectivity

35. The proposals place an apparently significant emphasis on the importance of open space and that it will comprise 3.14 ha of the 5.77 ha site. The proposals also emphasise the importance of a new “*public green*”, a new “*linear park*” (including walking and cycling routes) and a new “*town square*” which are descriptions which owe more to the marketing consultants than to reality.
36. This emphasis would be welcome and the site could and should provide significant opportunities for urban greening, improving connectivity, new play and growing spaces and ecological gain, as is also emphasised in the planning policy context, including Fortune Green and West Hampstead neighbourhood plan’s Policy 4 for development to “*provide new green/open/public space, new trees, and new green corridors....[and] provide improved pedestrian and cycle routes between West End Lane and Finchley Road*”. However this application signally fails to meet these intentions and aspirations.

Green space deficiency

37. Throughout the consultations and even in Gerald Eve's Planning Statement (para 1.12 (iv) e) the application claims that the application will "Provide a green neighbourhood with over 50% of the Site (3.14ha) as public realm to be accessible for all⁴". (Reference "4" = "Provide a phased delivery of public realm and open space to support linkages with the wider area", further diluting the useful and available "Green Space" so described). Leaving aside the absurdity of the description "a green neighbourhood" (see the images in paras 51 & 54) we note that the specialist environmental consultants Plowman Craven, actually identify only 2.6 ha of total public realm, or just 45% of the 5.77 ha site (para 4.8.2 Environmental Statement Non-Technical_Summary_Final.pdf). Of this 2.6 ha, there are two areas of recreational green space (however poor the quality): the "Community Gardens" at 3,000 sqm, and the "Public Green" at 3,800 sqm = 0.68 ha. The application would also like to include the "Linear Park" (which is effectively just a long path with a bit of landscaping at 5,250sqm), and "Finchley Square" which is also effectively a triangular path of 3,000sqm on a sloping gradient over 2 storeys, better described as "streetscape" than "green space". The remaining 1.1 ha of "public realm" is therefore made up of the matrix of excessively narrow, overlooked, and overshadowed spaces between the tower blocks (see again the images in paras 51 & 54 below): in short, the real, usable, and recreational green space under this application is of fundamentally poor quality and is a miserable 0.68ha out of 5.77ha, or 11.7%.
38. Even before the provision of c1,800 new homes and other commercial development, the site is in an area of significant green space deficiency. Both South Hampstead and West Hampstead have the highest Green Space Deprivation score (1) and the most deprived Green Space Deprivation rating (E) in Friends of the Earth's analysis of official data on [Access to Green Space in England](#) (2020): an alternative design concept is both needed and available in order to address this serious deficiency.
39. Camden's Local Plan policy A2 requires a minimum open space of 9m² per occupant, implying an open space of 40-45,000 m². For the sake of this assessment, and therefore even accepting Landsec's proposal at face value, this totals 15,050m² which is just one third of Camden's own policy requirement in an area that is officially green-space deprived.
40. Para 10.42 of the Planning Statement confirms that, under this particular design concept, "the Proposed Development is unable to meet the full policy requirement in respect to open space"
41. "Camden's Public Open Space 2021 1.22 **The importance of public open space cannot be exaggerated in an inner London location, where space is limited and open space has to meet a wide range of often competing demands.**" We therefore request the consideration of a different design concept in cooperation with the local community which will give full and proper priority to the design and value of the green space which is provided, while also meeting agreed levels of occupancy and other Local Plan objectives.

Connectivity

42. Our analysis of the proposals shows the green space and connectivity benefits to be overstated. We find the “linear park” running along the south of the site to be particularly limited, failing the definition and understanding of an actual park (eg “a large public garden or area of land used for recreation” ref: Oxford University Press www.lexico.com): it actually only consists of a narrow pedestrian route with basic planting, relatively few trees and hemmed in by tower blocks rising to over 100m. The route is so constrained that it cannot accommodate the main cycle route which takes cyclists on a parallel path along the north edge of the site. The mis-description also shows how a carefully-managed consultation with lay-members of the public can be framed to mislead the public participants.

Public realm

43. Only half of the public realm is provided in the parks, squares, greens and yard (53%, 16,509 sq m) and a significant proportion of that allocation is actually provided in a matrix of overshadowed narrow corridors running in canyons between the different blocks and offering very poor amenity. The microclimate, especially in relation to wind and sunlight, in these locations is likely to be hostile to their public enjoyment. The Planning Statement confirms the inadequacy of the local environment for a significant area of the open space provision in concluding that “all of the proposed open spaces within the wider masterplan may not achieve the recommended standards” (para 10.65) in relation to levels of sunlight. Many other spaces (such as those at “podium” level) are also relatively small, highly overlooked, and unattractive for use.
44. Para 10.42 of the Planning Statement confirms that, under this particular design concept “*the Proposed Development is unable to meet the full policy requirement in respect to open space*”

Urban Greening

45. The detailed proposals require the removal of over 30 trees and given the extent of the regeneration it is particularly disappointing that they do not meet the expected Urban Greening Score of 0.4 for predominantly residential development (Policy G5, London Plan). The supporting information provides conflicting results as to the Urban Greening Factor score. For the detailed proposals this is 0.39 in the Planning Statement (para 14.34) and either 0.35 or 0.34 in the Design & Access Statement (para 6.14.2 or page 270) and for the Masterplan it is 0.32 (para 6.14.1, Design & Access Statement). All these scores are inadequate and the site should significantly exceed the minimum Urban Greening Factor score. The supporting information should also be more robust in its analysis of this key policy consideration.

Town Square

46. We do not believe the proposals for an outside "town square" to be appropriate for the site, given the need for it to complement and not compete with Finchley Road. If a new "town square" is desired, the existing O2 Centre atrium already provides an excellent built-environment for an "all-weather" town square and the scheme should realise this potential whereas, by comparison, UK weather will inevitably lead to under-use and a bleak weather-beaten aspect for much of the year (as also experienced by the generally-acknowledged lack of "place" exhibited by the nearby "West Hampstead Square").
47. We also draw attention to the fact that this so-called "town square" is, in reality, on a sloping gradient over 2 storeys descent: it may meet building regulations, but it is far from a suitable solution, and also a significant challenge for anyone with mobility problems in climbing the 2 storeys to leave the site.
48. We conclude that both the quantity and quality of open space provision is inadequate and the scheme also fails to provide improved walking and cycling connectivity to the standard required.

Tall Buildings: Social & Environmental / Sustainable Impact on Future Residents

49. On 14 January 2021, the GLA Planning & Regeneration Committee wrote a paper which, amongst other comments, included:

“if a [residential] tower is proposed or a tower is thought about, to address density issues, then it should be required that alternative methods of achieving the same goals and densities should be demonstrated, shown and considered, as a prior condition; so that it [residential tower] is not immediately seen as the answer, but that alternatives should be presented, which is normal policy in so much as good governance, design and implementation of property moves.”

There was also recognition that:

“that as buildings get taller, the amount of energy and material used in construction will grow disproportionately as buildings get taller.”, and “Energy use is higher in tall buildings with electricity use twice as high . . .

The taller the building, the higher the amount of embodied energy required per useable square metre as low-carbon materials such as timber are not viable. Tall buildings also suffer more from heat losses for the same amount of insulation as lower buildings because of the higher wind speeds. . . . The Committee is concerned that tall buildings, whilst delivering higher densities and therefore seemingly making more effective use of land, will not produce the high quality homes and neighbourhoods that London needs.” . . . “There is a growing evidence base which demonstrates that tall buildings are less sustainable than those which provide similar quantum of development in other configurations.”

50. These issues were then considered so important that the GLA wrote to all local councillors in London on 2 September 2021, opening with the statement
- (a) “Our 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.”
 - (b) “the development of towers should only happen after robust evidence has been presented about how their social impacts will be mitigated”
 - (c) “... in general families are disadvantaged if they are living in tall buildings. The sociability that children are able to gain in terms of opportunities for play, for meeting others and so forth within tall buildings is often not great.”

- (d) “**direct** access to external space for families is absolutely crucial to the successful and healthy functioning of that household and that becomes incredibly difficult with tall buildings.”
- (e) “Professor Steadman similarly described the case of San Francisco where there is a “general limit on height of about 12 metres or four to five storeys” and where a height limit is driving developers to “find ingenious ways of achieving high density other than tall buildings.”
- (f) “The Committee is of the view that families should not be housed above the fifth floor in public housing . . . Overall, it believes that high density housing can be achieved by approaches that are more suitable for families, more in keeping with London’s traditional form, and are less intrusive on the skyline”
- (g) “Based on a nationwide survey of 2,500 households . . . the higher you got off the ground, the less comfortable you were in terms of your living environment and your happiness with your neighbourhood.”

51. By contrast, this is drawing below, which was presented by Landsec during a ‘consultation’ (but notably, we do not find an equivalent included in the application package), which shows how intrusive and damaging the proposals will be: indeed this drawing (misleadingly) only shows 11-14 storey buildings on the north side which is already lower than the actual application and which makes clear how such high & closely-packed buildings are Soviet in concept – except most Soviet developments would actually be further apart and with more green space.



52. We also believe that drawing 19066_X_(00)_P200_PROPOSED SITE ELEVATION NORTH & SOUTH.PDF is the closest drawing in the actual application, and note how the drawing has been manipulated by only showing the centre section in the detailed application, and only showing the foregrounds in detail and by “greying out” the linking blocks and the other blocks on the site.

53. As noted above, the red line also shows the profile of the existing O2 Centre, and therefore the height of the prevailing skylines for the surrounding communities and Conservation Areas, and the “more than substantial damage” caused by these inappropriate towers to the surrounding neighbourhoods.
54. However this 3D model below can also be found in the documents, and it gives a very clear picture of the Soviet-style concept and the oppressive way in which the site has been filled with inappropriate tower blocks.



Heritage Impacts

55. We have reviewed the impact of the scheme on nearby heritage assets, including five Conservation Areas. We believe that this application will cause “substantial harm” and cause significant negative effects beyond the immediate locality and raises significant architectural or urban design issues, namely the deliberate policy to jeopardise the architectural value and cohesions of the adjacent Conservation Areas by proposing high development of excessively closely-located towers, and rejecting the established, award-winning local precedent of high-density, medium-rise solutions instead. The contrast between the characterful low rise and largely Victorian and Edwardian streets of the surrounding area and the plans for towers rising to over 100m across 10 development plots could not be starker. It is evidenced by even cursory study of the results of the Townscape and Heritage Visual Impact Assessment provided with the application.

This attached photograph shows how consistent the skyline existing around the site and surrounding area actually is at present, and indicates how much damage could be caused:



56. A consistent feature of the character appraisals for the adjacent Conservation Areas is their sense of enclosure with only rare and generally more distant views of buildings beyond their boundaries. This will be wholly disrupted by the current proposals which will create jarring visual intrusion in Views 7, 11, 12, 15 and damaging intrusion in Views 3, 4, 5, 6. Many other relevant views have significantly been omitted. We share Historic England's view that the proposals also cause "harm" to the view protected by the London View Management Framework of St Pauls from Greenwich Park.
57. We also consider there to be substantial harm caused to views into and from the South Hampstead Conservation Area, and particularly along the length of Broadhurst Gardens on the north edge of the Conservation Area and longitudinal views along Fairhazel Gardens and Priory Road.
58. As regards the question of whether the harm is "substantial" or "less than substantial", the recent decision in *The London Historic Parks and Gardens Trust vs Minister for Housing et al* 8/4/2022 <https://www.judiciary.uk/wp-content/uploads/2022/04/LHPGT-v-Minister-for-Housing-Judgment-080422.pdf> (published following the previous submission by Heritage England) has clarified that the test is actually "*the ability to appreciate that asset in its setting is very much reduced*".

59. The heritage value of the South Hampstead Conservation Area and all the adjacent heritage areas are in the particular 19C urban typology, and this is clearly "very much reduced" by the presence of a wall of high-rises dominating the vista and damaging the area's consistent skyline, as also indicated by the photograph above.
- In reality, Conservation Areas are considered so sensitive that, for example, if a resident wishes to upgrade their windows to be double-glazed (as appropriate to a Climate Emergency), they need to ensure that the new windows will be identical in appearance to the originals, and still to seek planning permission to confirm the replacement. Having established that level of sensitivity for a Conservation Area, it is clear that dominating the skyline of the Conservation area with a wall of unnecessary tower blocks, as well as dominating the views into and within the Conservation Area, at least meets the necessary threshold of "the ability to appreciate that asset in its setting is very much reduced" and in reality probably meets the criterion of "serious harm" also.
60. Before the judgement referenced above was issued, it is possible that Heritage England might have applied a previous possible interpretation of "substantial" as "seriously drained away": this judgement determines that this is now an incorrect interpretation and the correct interpretation, easily met in this case, is "the ability to appreciate that asset in its setting is very much reduced".
61. The planning policy context for protecting heritage assets is clear from the London Plan ("avoid harm" Policy HC1); Camden Local Plan ("resist development outside of a conservation area that causes harm to the character or appearance of that conservation area" Policy D2); and Fortune Green and West Hampstead neighbourhood plan ("Proposals which detract from the special character, and/or, architectural and/or historic significance, and setting of Conservation Areas and heritage assets in the Area will not be supported" Policy D3). The neighbourhood plan explicitly recognises that "views of, from, and around the Area's conservation areas are of great importance to their setting" and protects them in Policies 2 and 4.
62. Camden Council is also under a legal duty by virtue of Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. National planning policy requires "great weight" to be given to the harm to heritage assets when determining the application. The pre-planning advice writes "The effect of this section is that there is a statutory presumption in favour of the preservation of the character and appearance of Conservation Areas". This is not achieved by the current plans.
63. The Camden Plan Strategic Objective 7 writes "7. To promote high quality, safe and sustainably designed buildings, places and streets and preserve and enhance the unique character of Camden and the distinctiveness of our conservation areas and our other historic and valued buildings, spaces and places.

Camden Plan Objectives 1, 2, 3 and policies D1, D2, A1, CC1, CC2, CC3."

Para 2.11 “Good design can increase density while protecting and enhancing the character of an area (Please see Policy D1 Design and Policy D2 Heritage for more detail on our approach to design and heritage). All development should be of excellent design quality and should sensitively consider the amenity of occupiers and neighbours and, particularly in conservation areas, the character, heritage and built form of its surroundings.

2.24 It is important to note that the growth areas are next to, and sometimes include, existing residential communities and heritage assets such as conservation areas. Development must therefore take account of its sensitive context. Further details on the specific growth areas and priorities are set out in more detail below.

2.38 The Council will continue to work with partners in the area including the Fortune Green and West Hampstead Neighbourhood Forum to investigate a range of solutions and ensure that development is coordinated to provide the best outcomes and takes account of the Neighbourhood Plan.

2.53 The borough’s town centres are considered to be suitable locations for the provision of homes, shops, food, drink and entertainment uses, offices, community facilities and are particularly suitable for uses that are likely to significantly increase the demand for travel. They are considered to be suitable for higher density developments provided that they are of high quality, contribute to the character of the area taking into account conservation areas and other heritage assets and the full range of relevant Council policies and objectives.

7.29 The Council will also seek to protect locally important views that contribute to the interest and character of the borough. These include: [. . .]

- views into and from conservation areas;

7.30 The Council will seek to ensure that development is compatible with such views in terms of setting, scale and massing and will resist proposals that we consider would cause harm to them. Development will not generally be acceptable if it obstructs important views or skylines,

7.41 The Council places great importance on preserving the historic environment. Under the Planning (Listed Buildings and Conservation Areas) Act the Council has a responsibility to have special regard to preserving listed buildings and must pay special attention to preserving or enhancing the character or appearance of conservation areas. The National Planning Policy Framework states that in decision making local authorities should give great weight to conservation of designated heritage assets in a manner appropriate to their significance. The Council expects that development not only conserves, but also takes opportunities to enhance, or better reveal the significance of heritage assets and their settings.

7.44 The Council will apply the policies above and will not permit harm to a designated heritage asset **unless the public benefits of the proposal outweigh the harm**. Further guidance on public benefits is set out in National Planning Practice Guidance (Paragraph: 020 Reference ID: 18a-020-20140306). Any harm to or loss of a designated heritage asset will require **clear and convincing justification which must be provided by the applicant to the Council**. In decision making the Council will take into consideration the scale of the harm and the significance of the asset.

7.46 The Council will therefore only grant planning permission for development in Camden's conservation areas that preserves or enhances the special character or appearance of the area. **("across the street" is therefore as important as "next door")** – *in this case, not within a single Conservation Area, but within a surround of Conservation Areas.*

7.48 Due to the largely dense urban nature of Camden, the character or appearance of our conservation areas can also be affected by development which is outside of conservation areas, but visible from within them. This includes high or bulky buildings, which can have an impact on areas some distance away, as well as adjacent premises. **The Council will therefore not permit development in locations outside conservation areas that it considers would cause harm to the character, appearance or setting of such an area.**

64. For the reasons outlined in the rest of these representations we do not consider the public benefits of the proposals to outweigh this harm and so the planning judgement required by national planning policy (para 202) must conclude that the planning application should be refused.

Housing need and affordability

65. The proposals are for ca1,800 new homes and for 35% of these to be affordable.

Meeting needs

66. A development of 1,800 homes would make a significant contribution to meeting Camden's housing needs. Nevertheless, Camden Council anticipates a need for c950 homes on the site as part of its emerging site allocations strategy to meet national planning policy requirements that "a sufficient amount and variety of land can come forward where it is needed" (para 60, NPPF), including the increased requirements established in the new London Plan. The excess housing is not required to meet identified housing needs and it results in significant overdevelopment of the site.

Affordable homes

67. 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. Similarly, the maximum proportion of affordable rent that can be social is 60% (conveniently exactly the minimum) and the lowest rent level that can be provided within that social housing is London Affordable Rent (conveniently exactly the highest rent 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. We share the view expressed in the pre-application advice that *“this a very unconstrained site in comparison to most large development sites in the borough”* and *“the proposed affordable housing should be significantly increased.”*
68. We contest the Financial Viability Assessment and seek an independent review of its methodology and conclusions. 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 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. We also believe that an alternative concept and design could reduce costs and therefore increase the financial ability to increase the affordable housing provision.
69. We also object to this overall design and plot-layout concept, which has lead to all the affordable homes being provided on a single Plot N4. This conflicts with Camden Local Plan Policy H6 “to minimise social polarisation and create mixed, inclusive and sustainable communities”. Affordable homes should be integrated throughout the development site and be indistinguishable from other homes.

Housing types

70. We have also considered the range of types of new homes being provided and found it wanting.
71. 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”

72. The detailed proposals provide for the following range of housing types (with the need identified in Camden’s Strategic Housing Market Availability Study (SHMA) in brackets):

- Studio/one bed – 278, 46% (8%)
- Two bedroom – 248, 41% (37.5%)
- Three bedroom – 82, 13% (37.5%)
- Four bedroom – 0, 0% (16%)

73. 87% of the development will be one and two bedroom homes which is double the need identified in Camden’s SHMA.

74. 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:

	<i>Social rent</i>		<i>Intermediate</i>		<i>Market</i>	
	Proposal	Plan	Proposal	Plan	Proposal	Plan
Studio/one bed	2%	Lower	8%	High	36%	Lower
Two bedroom	6%	High	8%	Medium	31%	High
Three bedroom	9%	High	2%	Lower	3%	High
Four bedroom +	0%	Medium	0%	Lower	0%	Lower

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

76. 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 local need. There is therefore already a significant under-provision of two- and three-beds in West Hampstead, in breach of Local Plan Policy H7 and Neighbourhood Plan Policy 1(ii).

77. 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 planning policy.

The O2 Centre

78. The existing O2 Centre makes a hugely positive contribution to the area in general and specifically to the Finchley Road Town Centre, and the community asks the council to deny permission for its demolition. The owner has expressed concerns about future financial viability which have been self-serving in support of the owner's goal to demolish the building and to replace it with still more flats, out of scale with the Finchley Road, and in an inappropriate and undesirable relationship with the Finchley Road for residential accommodation.
79. We believe the refurbishment of the building can adapt it to any preferred unit purposes and sizes, in order to follow any current or future trends in retailing styles, and the additional residents on the site will of course greatly enhance the customer base and help the retained O2 Centre to flourish in both occupancies and profitability. In addition, a retained O2 Centre will provide an excellent hub to help integrate the new residents with the existing community, and would be an excellent location for facilities which can serve both new and old residents, such as a new GP surgery, youth clubs etc which can then easily be provided should the site remain phased. This is consistent with the SPD which writes the site is *".... an incredible opportunity to create a genuinely new mixed use neighbourhood that knits together the well-established communities that surround it"*.
- This is failed by the current application.
80. Conversely, demolition and re-provision in the body of the site will tend to separate the new residents from the community, and will tend to direct the nearby community to other similar facilities such as Brent Cross instead, with commensurate increases in traffic, pollution, and carbon emissions. In addition, should there be a suggestion that a GP surgery should be provided in the first phase of construction in the this unacceptable plan, access would then be through and around the subsequent construction phases of 2 & 3 and all their construction traffic.
81. Finally, demolition and re-provision will damage the Finchley Road Town Centre (contrary to Local Plan policy TC1 (Quantity and location of retail development), TC2 (Camden's centres and other shopping areas) and TC4 (Town centre uses) which seek to ensure that the development of shopping, services, food, drink, entertainment and other town centre uses does not cause harm to the character, function, vitality and viability of a centre) by removing a customer focus and attraction in the building itself, and because new provision within the site will compete with the Finchley Road Town centre rather than supporting it. Should Finchley Road Town Centre decline further with more failed and empty shops replaced by charity shops, gambling facilities, dark kitchens and delivery services as at present, it will be a social ghost town, undermining both the existing community and the new residents. Finally, the proposed replacement building is inappropriate and out-of-scale with the Finchley Road streetscape, tending to create an oppressive "canyon-like" effect on that narrow

section of road, to the detriment of existing residents nearby, and to the areas attractiveness as a destination to shop. We share the pre-application advices concerns in this regard and believe no robust justification has been provided for the low provision of town centre floorspace: on the Finchley Road where it will serve the Town Centre, rather within the site where it would likely undermine the Town Centre.

82. The O2 Centre opened as recently as 1998 and was carefully supervised in its scale and design by the Camden Planning Department to be as well-suited to its location and to the adjacent Finchley Road streetscape as possible, before permission was given for the development (now also complimented in the Historic England brief).
83. London Plan Policy SI2 requires developments referable to the Mayor to “*demonstrate actions taken to reduce life-cycle carbon emissions*”. The embodied energy in the O2 Centre is significant and the scheme’s Whole Life Carbon Assessment does not support its demolition. Under three scenarios – business as usual; refurbishment of the O2 Centre; and implementation of the development proposals – the retention and refurbishment of the O2 Centre scores best within realistic assumptions about how much of the embodied carbon in the existing building can be retained in the development proposals (paras 14.41-14.47, Planning Statement). The calculations are sensitive to their assumptions but they do demonstrate the value of an alternative approach to the future development of the site.
84. In terms of the Climate Emergency and carbon emissions, the current plans are based on traditional “pre-Climate Emergency” construction of reinforced concrete and masonry: steel, concrete, and masonry represent between 15-20% of global carbon emissions, whereas a mass-timber construction would actually be locking up carbon within the construction, not just emitting it: we have recommended an alternative concept and typography which would be suited to more ecological construction design, in keeping with Camden’s stated commitments and obligations, and which could be a “beacon development” of sustainable mid-rise, high-density, housing.
85. Since the design of this current application fails to give appropriate weight to the Climate Emergency and Camden’s stated responsibilities, we ask that the owner be advised to really work with the community to explore other plans, typologies, and visions: for example, the current plan is for high-rise blocks and towers (which are typically more expensive than low-midrise), and in traditional construction of brick and concrete (again, environmentally least sustainable). The community envisages a possible adaptation of mid-rise terraces around the edges of the site, potentially with at least the family units provided with patio terraces, factory-made from sustainable mass timber construction using passive-solar and eco-energy design, the possibility of additional gardens, running tracks etc along the roofs of the terraces, ground source heat-pumps buried under the central park, and the possibility that this would also prove to be at a comparable or lower cost, with greater social value and the possibility of higher levels of affordable housing.

Social infrastructure

86. The current application fails to provide key infrastructure, such as GP surgeries etc in phase 1 and defers these to later phases in the masterplan. We believe these are already in short supply and needed from the outset and ask for them to be provided in a retained O2 Centre from the beginning. This is in keeping with Policy C1 of the Local Plan and Policy 10 of the West Hampstead Neighbourhood Plan. A relevant example and precedent can be cited in the case of King's Cross which is covered here <http://www.camdennewjournal.co.uk/article/no-nhs-doctors-left-to-serve-people-in-boroughs-largest-regeneration-site>. Original outline permission 2004/2307/P committed to a GP's surgery somewhere in the site, but then one by one, the sites came and went without it. Despite the current O2 Centre site application taking place 18 years later, the healthcare facilities are secured in much the same way with no provision in the detailed permission. This provision is needed from the first phase, and provision in the first phase and in the retained O2 Centre will best serve both the future and existing residents, and guarantee that the future residents will not find themselves in an analogous situation to Kings Cross and in breach of policy.
87. From the community's perspective, as explained above, our focus is that this application is fundamentally and fatally flawed and needs to be withdrawn or rejected, and so the comments above have been to focus on those four primary areas of height, density, poor use and allocation of green space, and the proposed demolition of the O2 Centre.

However, while therefore not in the 4 core concerns, we also need to express our concerns for further technical considerations which will continue to be relevant even following a new project concept. Although a reduction in site capacity back to the previously approved 950 dwellings (ie almost 3000 people) will help in regards to infrastructure demand also, we also include our continuing concerns in regards to infrastructure, as follows:

- (a) Transport: capacities and step-free access at the nearby stations. We also note that in November 2019 (immediately pre-COVID), the Jubilee Line was running at 115% capacity, and the Metropolitan Line was running at 97% capacity. In addition recent plans to upgrade signalling etc to increase services and capacity have recently been cancelled.
- (b) Similarly for schools: the community would be glad of reassurance that sufficient local school places will be available within reasonable distances for the various relevant ages or the number of dwellings will need to be constrained according to capacity.
- (c) Similarly the community is already concerned about levels of wider health care services in the area. We have referred to locating the needed GP surgery in a retained O2 Centre to serve both future residents and the nearby

community, but capacity concerns remain in addition for all needed local healthcare services.

- (d) Some of the areas surrounding the site are already subject to unacceptable flooding and the Thames Water comments are noted with great concern, including the opening statement that “Thames Water has identified an inability of the existing SURFACE WATER network infrastructure to accommodate the needs of this development proposal”. The further Pell Frischmann report “Flood Risk Addendum” identifies 6 specific points of failure.
- (e) We also note that, in spite of a pre-application consultation with the Metropolitan Police “Design Out Crime Office”, the application has failed to listen to their concerns either, and the official Police Response opens with the comment ***"I cannot support this application in its current form . . ."***, with concerns due to poorly overlooked spaces, narrow through-ways, multiple egress routes, etc, all of which are inherent in the design concept, and subject to significant improvement with an alternative site design.

Summary

88. In light of these representations (particularly as summarised in para 25 above and the 3D model in para 54 above), we ask for this application to be withdrawn or rejected and we look forward to working more closely with the landowners and prospective developers of the O2 Centre site, and the wider community, to develop an alternative concept which will help deliver shared ambitions for this critical part of our neighbourhood.