

## Fortune Green & West Hampstead Neighbourhood Development Forum

Objection to Section 73 application for Phase 1 of O2 Centre Redevelopment; 2025/0484/P

### Summary and Key Points

The Fortune Green & West Hampstead Neighbourhood Development Forum has never considered that the use of a large part of this site as a surface car park is the best way to use this prime site between two tube stations. The Neighbourhood Plan that the residents of West Hampstead overwhelmingly voted for in a local referendum in 2015 said that the primary use of any development of this site should be housing and above all affordable housing.

However, the Neighbourhood Plan also said that the “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 pages 31 and 32 of the NDP). The NDF was firmly of the view that the originally planning application did not do that, with its high-rise blocks towering over the five neighbouring conservation areas, and we opposed the plan that was approved by Camden Council, which covered by detailed approval for Phase 1 and outline approval for the whole master plan site.

**Density.** The updated plans add 43 more homes, taking the total in Phase 1 to 651. This is a 7% increase on the previous number of flats. This takes the plans even further away from the Council’s own Local Plan and Site Allocations Plan. It will lead to even more congestion in the local area, including at the local tube stations and on trains. Camden’s own policy documents (Local Plan and Site Allocations Plan) indicate that approximately 950 homes is the right number for the whole of the Homebase & Car Park site.

**Height.** The updated plans add two storeys to three of the tallest blocks in Phase 1, and extra storeys to five other blocks. This takes the tallest block to 17 storeys, with two 16 storey blocks. The tallest block is now over four metres higher than previously approved. This is even more out of keeping with the local area.

**Housing Mix.** Of the 43 new homes, 20 are “affordable”, with only 8 at genuine social rent levels (described as low-cost rent). This keeps the percentage that is “affordable” at 36% by floor space. This continues to be less than Camden Council’s policy of 50% affordable homes in new developments.

- The planning application doesn’t meet the Mayor of London’s requirement that applications should show the percentage of affordable housing by habitable rooms.
- More of the flats are “single aspect” i.e. they only have windows on one side of the flat.

**Green Space.** The application makes much of the additional 300 square metres of green space created by removing one of the blocks. However, Camden’s standard for open space is 9 square metres per occupier. Even if there were only one person living in each of the 43 new flats, which seems unlikely, that would mean that the required additional open space would need to be 387 square metres to meet Camden’s standard.

- Assuming no changes to later phases, the total green space required by Camden’s standard was estimated at 33,261 square metres. The previous proposals offered 13,308 square metres. Adding a further 300sqm only takes the total to 13,608, which is still much less than half of what Camden’s policies require. Policy 17 of the NDP, page 60, emphasises the need to protect green and open space and the appropriate provision of new space for additional housing.

**The Community Centre building.** The new Community Centre plans have a lot of drawbacks. Moving it from its previous location (under block N4B) to its new location to the south of N4C means that it is no longer connected to the central square. And it is south facing with floor-to-ceiling windows which will make it overheat in summer.

### **Detailed comments**

#### **Can an additional 43 Homes be Justified?**

We note the significance of evolving Government policy on stairs in tall residential buildings, recent changes in Building Regulations, and the publication of revised BS 9991 since the consented design was submitted in December 2022. We also acknowledge that the effect of these changes is likely to increase the size of the circulation cores, which would result in a corresponding decrease in residential net internal area if the building envelope were to remain as consented.

In order to re-provide the consented number and mix of dwellings, it therefore might be reasonable to permit modest expansion of the building envelope. The least disruptive (and most cost-effective) way would be to widen the floorplates slightly to maintain the same mix of dwellings around the larger cores. The alternative would be to replace the lost accommodation by adding an additional storey, but this would be more costly due to the associated additional façade and would be far less desirable for its impact on townscape. By reducing the floor-to-floor height in each block by 100mm there is a net reduction in the overall height of a 15-storey block of 1.5 metres. On this basis ‘one’ additional storey might be considered reasonable but ‘two’ is clearly overdevelopment of the site; especially as this impacts on a ‘protected’ view of St. Paul’s Cathedral from Greenwich (see comments on Height below)

The s73 proposal seeks to add 43 additional homes to this consented phase by adding storeys to all but 2 of the 10 blocks in phase 1.

#### **Non-Compliance with Adopted Local Plan**

By seeking to increase the quantity of accommodation beyond the numbers already consented, this S73 application reopens the question as to how it can be justified in relation to the applicable Planning policies:

LB Camden Local Plan & Site Allocations Plan 2020

Policy WHI2 (02 Centre, carpark & car showrooms sites)

- Proposed uses: Mixture of types of permanent self-contained homes, town centre uses, community uses, open space
- Indicative housing capacity: 950 additional homes

Camden’s own policy documents (Local Plan and Site Allocations Plan) indicate that approximately 950 homes is the right number for the whole of the Homebase & Car Park site, of which Phase 1 is only a part. That the applicant is now seeking to increase the consented 608 homes in Phase 1 yet further, by 7%, will test LB Camden’s governance of its own published planning policies.

#### **GLA Affordable Housing Targets (May 2023 Draft)**

- Section 2.7.1 requires the percentage of affordable homes to be measured by habitable room.
- Section 2.7.2 requires applicants to present affordable housing figures by habitable room, by

units, and by NIA. This S73 application fails to follow this policy by presenting the affordable homes by GIA and making no mention of habitable rooms.

**General:** The overall design of the external form has generally improved, less 'beige' and punchier with contrasting red and white blocks, consistent use of chamfered corners to the blocks and projecting balconies and stronger more decorative elements, especially at ground level.

**Height:** The final heights of the consented scheme were much higher than the community considered acceptable. So seeking planning permission in this application for two extra stories, even if 100mm per floor to floor is shaved off (1.5m lower on a 15 storey block), is even less acceptable. The scheme appears visible around St Pauls on the Greenwich view (V19 Page 43).

**Detail of Plot N4:** Externally the design has improved with stronger character in its architectural detail, the omission of Block N4D to the SW corner is welcome but its replacement with the double height community centre is a change of dubious value. We believe that it would be more desirable to maximize active frontages at ground level, better to be able to see into bike, refuse and bin stores rather than windowless facades.

**Landscape & Public Realm:** We recognise some improvement in the design. It would be desirable for as much of this as possible to be planted (especially with trees) as early as possible, so the community can get some benefits as the construction commences. Greater detail is needed concerning the boundary treatment by the TfL lines to the south. An opportunity has been missed to have a direct path alongside the railway lines to minimize movement through the remainder of the space. A translucent boundary to the north of railway lines would also be preferable, but we welcome planting on what would otherwise be considered just as a service road.

#### **Community Centre:**

Its new location and form raise further questions. The future needs of this emerging community are currently unknown until homes are occupied. In these early years community provision might be better as 'pop-up' facilities in the currently underused O2 Centre building which will remain until Phase 3 and also to support multiple existing facilities in the area that struggle to survive (e.g. West Hampstead Library, Sheriff Centre, now closed Kingsgate Centre etc.). The revised location means it no longer adjoins the Central Square (to the south of block N3E) so it is harder to provide to support more outdoor activities which will happen as the climate gets warmer.

A double height building is questionable as most activities are best located at ground level and as proposed the upper floor is fenced off from the residential outdoor amenity space. The all-glazed south facing elevation will be prone to overheating.

A better solution would be to identify this as the location for a 'future' community centre which can be delivered later in the overall site development offering a more flexible design that will be genuinely coauthored by the emerging community. At this stage it might be best for the detail to be a reserved / conditional matter.

The curving steps by the relocated Community Centre are overblown and at odds with the rationality applied to the design of the buildings.