

## **Camden Council Consultation Document on Supplementary Planning Document (SPD) – “West End Lane to Finchley Road: Principles for a new place”**

### **Comments by Fortune Green and West Hampstead Neighbourhood Development Forum (NDF)**

**5 April 2021**

The NDF clearly understands that Camden is consulting at this stage not on specific proposals by Landsec, the owners of much but not all of this site, but on Camden’s own Supplementary Planning Document (SPD) for this area. This response is therefore concerned with the draft SPD itself, and not with Landsec’s developing plans for the site, although they are clearly relevant here.

The NDF will continue to actively monitor and respond to Landsec’s proposals for the area, a process which has already involved jointly hosting an online public meeting attended by nearly 100 people on 22 March. That event demonstrated the high level of interest amongst local residents about the future use of this site.

The NDF recognises that the SPD forms part of a hierarchy in which it comes under the National Planning Framework, The New London Plan, the Camden Plan and the Fortune Green and West Hampstead Neighbourhood Plan (NDP), and does not therefore generally reiterate all the principles of those higher planning policies but focuses on the specifics of the designated area. In particular, the SPD says nothing about the levels of family housing and genuinely affordable housing that will be expected on this site. While we recognise that this is covered in the other planning documents mentioned, a cross-reference to the need for a significant proportion of social rented housing should be included in the SPD.

The NDF also recognises that the designated area is an area previously identified as an intensification area for significant mixed-use development, in particular for housing.

The Neighbourhood Development Plan (NDP) specifically addressed the area in the SPD and the NDF has been pushing, for many years, for a master plan for the area. We therefore very much welcome the publication of this draft SPD. The NDF, with the help of Camden Planning, organised a workshop looking at masterplanning for the West Hampstead Growth Area back in November 2016, the results of which in many respect match what is presented in the draft SDP in so far as the workshop considered the area covered by SDP.

Above all else the NDF considers it positive that both Camden and the major landowner appear committed to a holistic approach for all the different sites suitable for redevelopment within the area. We are concerned that this approach should be adhered to rather than piecemeal development of the site taking place, which cannot be ruled out given that several different landowners are involved here.

The possibility that the O2 Centre might be redeveloped so soon after publication of the NDP was not recognised at the time that the NDP was formally adopted by Camden Council in September 2015, but the NDF will use the principles of the Plan in shaping its view of how such redevelopment should be included within the SPD.

## **Specific comments on sections of the SPD**

**Page 6 para 1.1.** The area of the SPD on the maps/plans includes the relevant frontage on West End Lane and Finchley Road. We would like both these frontages to be specifically mentioned in the first paragraph as they are very important in establishing the link between Finchley Road and West End Lane that any major development would provide. These frontages are currently poor in terms of appearance, pavement width, safety of pedestrians etc. Any scheme should attempt to increase pavement widths and reduce pavement clutter.

**Page 6 para 1.4.** We agree that redevelopment of the O2 Centre, and indeed any other development in the area, should be designed to be flexible given the speed at which demand for commercial and residential space and type is likely to change in areas such as West Hampstead over the next few decades, and beyond. This is all the more the case given how hard it is to predict trends in retail and residential in the wake of the Covid-19 pandemic.

**Page 8 Vision.** The NDF broadly agrees with this vision and particularly notes the intent "to benefit existing neighbours". There are many local residents who feel that the impact of a major development on this site could very easily cause deep long-term disbenefit in the area, particularly in the areas of infrastructure, both physically such as water supply, sewerage, electrical/media networks, and social infrastructure such as doctors, dentists, social services, and the impact of very large numbers of new residents using existing streets/pavements and transport, particularly the underground. We believe that the SPD should present figures on current local population density that would be available to be compared to any proposed development, individually and holistically. A survey of existing supply and demand of services such as doctors and dentists, and comments on existing physical infrastructure supply and demand should also be included. We would also welcome a requirement for facilities for young people such as sports pitches and gyms.

**Pages 10/11/13,14.** Given the comments made below on building heights (Para 3.14) the NDF is concerned by the height and design of some of the buildings shown in the pictures.

**P16/17/18/19** The NDF agrees that linking the two ends of the SPD space is very important, and redevelopment, especially if the O2 Centre itself is demolished and redeveloped, provides a unique opportunity to improve frontages of West End Lane and Finchley Road, improving pavements and access for pedestrians. The NDF will be looking closely at any future proposals in this area. We welcome the fact that the draft stresses the important of step-free access and a new entrance to West Hampstead tube station, and possibly also at Finchley Road station. We further welcome the fact that walking and cycling routes are encouraged and that there should be no car access from West End Lane. Preventing car access from West End Lane is an important issue that has been respected ever since the O2 was opened in the 1990s.

**P16** The NDF supports the redevelopment of the O2 but would expect that a range of commercial facilities would be retained, as well as the planned additional commercial activity throughout the whole SPD area. The impact of a car-free area needs to be analysed from the perspective of shoppers and commercial providers. The NDF approves of the proposal to set back any new building.

**P24. Sustainability.** The NDF wishes to stress the importance of easy/low maintenance green areas to ensure maintenance of the quality of the green space.

Solar gain is an important issue given the world may be one degree hotter in 20 years' time. This means avoiding large areas of glass.

**P32 Building massing and heights:** These, along with matching local styles and design are the biggest issues for the NDF. The Neighbourhood Plan says that "Any new development will need to respect, and be sensitive to, the height of existing buildings in their vicinity and setting (see Policy 2)". This wording was the tightest that was possible/permissible in drawing up the plan so it is worth reiterating that the intent of these words was that new buildings should not be taller than immediate neighbours. That is that the top of proposed buildings measured from sea-level should not exceed that of the NIDO building in Blackburn Road at one end of the site and the O2 centre at the other end. The NDF will pursue that definition whenever possible.

It is worth remembering that the NDF was established because of local horror at the height and design of the Ballymore development, West Hampstead Square.

The West Hampstead area has a number of elegant mansion blocks that have achieved and proved over many decades that high levels of population density are possible on a human scale. Through the NDF and other pressure, the development at 156 West End Lane was restrained to match the building height and design of its neighbours in West End Lane, and the NDF will seek similar restraint within the SPD area.

## **Fortune Green and West Hampstead Neighbourhood Development Forum**

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