



City Hall Greens

**Sian Berry AM
City Hall
Kamal Chunchie Way
LONDON E16 1ZE**

**The Mayor
City Hall
Kamal Chunchie Way
London E16 1ZE**

(By email)

02 May 2023

Dear Sadiq,

Re: Stage 2 referral for GLA ref 2022/0181/S1 and LPA ref 2022/0528/P – The O2 Masterplan Site, Finchley Road, NW3 6LU

I am writing to ask you to refuse the LandSec application for The O2 Masterplan Site, which was approved by Camden Council Planning Committee on 30 March 2023, when it is passed to you for a Stage 2 decision. The application is for:

“A hybrid application for up to 1,800 homes and up to 19,682 sq.m. of non-residential floorspace in buildings of up to 16 storeys, comprised of a detailed application for demolition of existing structures and construction of buildings of up to 15 storeys (plus lift over-run) containing 608 homes; 1,733 sq.m. of retail; 114 sq.m. of food and drink; 155 sq.m. of professional services; and a 270 sq.m. community centre, together with public realm and access; and an outline application (all matters reserved) for buildings of up to 16 storeys containing up to 115,000 sq.m. of residential use and up to 17,410 sq.m. of non-residential uses, together with public realm and access.”

While I fully support the principle of making better use of this site for housing, there are a number of problems with this development, which is why I am asking you to direct the Local Planning Authority to refuse the current application.

1. Height and design of the proposed buildings

In the Strategic issues summary of the Officers’ Stage 1 report for this application, it says:

“The site is not identified as appropriate for tall buildings and there are concerns that the scale and massing of Outline Phase 3 results in some areas of non-compliance with London Plan Policy D9(C), including ‘less than substantial’ harm to the significance of heritage assets.”

Further clarification is given in paragraph 72, where it states:

“In line with London Plan Policies HC1 and D9, the applicant should adjust the height strategy seeking to avoid harm to the significance of heritage assets.”

In the July 2022 document, Proposals for the redevelopment of O2 Centre site Representations on behalf of the Confederation of Local Community Groups, which was produced by 13 local community groups in the four Conservation Areas and other adjacent areas around the site, they describe the proposed high-rise buildings as: “intrusive and damaging.”¹

The local groups go on to say that the: “site has been filled with inappropriate tower blocks” which will cause: “more than substantial damage” [...] “to the surrounding communities and Conservation Areas.”

Additionally, the Chair of the London Assembly Planning & Regeneration Committee wrote to all London councillors sitting on planning committees to report on its Housing typologies investigation findings in September 2021. In that it said:

*“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.”*²

2. Embodied carbon

The Officers’ Stage 1 report says that “Further information is required on energy, whole life carbon, circular economy, green infrastructure, water, and air quality”, and more specifically:

“The demolition of the existing O2 Centre has been assessed against Circular Economy principles and parts of the existing substructure could be retained, which is welcomed.”

However, nowhere in the report is the issue of the embodied carbon examined and, in particular, no comparison is made between demolishing the existing structure and any option to retain in full and refurbish/extend the shopping centre building. The current centre was only completed in the last 25 years and demolishing it, along with wasting a huge amount of existing embodied carbon, is an unnecessary waste of a building.

A retention option should have been assessed and compared with the current plans as part of the whole life carbon impact of the development and, in its absence, your decision should be to refuse these plans as a wasteful and high carbon option contrary to the principle of London Plan policy SI 2, whose stated goal is: “Minimising greenhouse gas emissions.”

¹ Proposals for the redevelopment of the O2 Centre site, Representations on behalf of the Confederation of Local Community Groups, Jul 2022, accessed 27 Apr 2023, http://www.southhampstead.info/uploads/1/3/7/5/137534388/o2_centre_-_representations_on_behalf_of_the_confederation_of_local_community_groups_final.pdf

² Housing typologies investigation findings, 2 Sep 2021, https://www.london.gov.uk/sites/default/files/letter_to_councillors_-_housing_typologies_1.pdf

3. London Underground station improvements

Much more detail is required on the Section 106 contributions required to improve the accessibility at West Hampstead underground station, with the aim of making it fully step-free. The Stage 1 report says: “there is sufficient detail and understanding to allow this exercise to inform section 106 contributions and identify the works within local CIL priority lists.”

In contrast, I am concerned that the developers have offered just £10 million in contributions for this when, in 2019, the cost was estimated to be at £10-15 million.³ Four years on, these costs will have risen considerably, and there is no reason why this development could not cover the whole costs without asking for additional council-level expense.

The proposals also ignore the opportunity to improve Finchley Road underground station, which many residents of this site will live closer to than West Hampstead. Any revised application should be accompanied by contributions to improve access and capacity at both stations.

4. Open and play space

The application does not meet the Local Plan policy requirement for open space, proposing a financial contribution in mitigation, which cannot make up for the daily detriment to quality of life that would be caused by a proposal with so little space for play and wellbeing.

Within the Detailed Phase, the application also does not meet the requirement for 2,100 sq m of play space, only proposing 1,200 sq m of publicly accessible play space – ie available to all tenures – within the Linear Park, the residents’ podium gardens, and the Community Green.

5. Tenure mix and viability

The Affordable Housing Statement prepared and submitted by Quod on behalf of LandSec makes much of the fact that this scheme is anticipated to be: “Build-to-Rent and is therefore not required to provide any low cost rented homes by national or regional policy.” Yet, it has a proposed tenure mix of 35 per cent affordable housing (by habitable room), split 60 per cent London Affordable Rent and 40 per cent intermediate rent.⁴

While this tenure mix may be eligible for the fast track viability route, to be secured by section 106 agreement, it does not meet the Camden Local Plan affordable housing target of 50 per cent and a guideline tenure mix of 60 per cent social-affordable rent and 40 per cent intermediate, and therefore should be refused.

³ Andrew Dismore AM, West Hampstead step-free access, Written MQ 2020/2306, 16 Jul 2020, <https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/west-hampstead-step-free-access>

⁴ O2 Masterplan Site, Finchley Road Affordable Housing Statement, Jan 2022, accessed 25 Apr 2023, <http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/9447309/file/document?inline>

Furthermore, Build-to-Rent homes are becoming increasingly prevalent across London and, given the lack of regional or national policy to govern them, ongoing management issues and the maintenance of promised affordability levels will be very difficult to enforce, whether by you, the council or future tenants. Given the likelihood that any of the promised affordability will be short-lived and difficult to enforce, this scheme is not currently able to show clear compliance with affordable housing policies and should be rejected.

On the basis of these points, I strongly urge you to direct the Local Planning Authority to refuse the application.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sian Berry', with a stylized flourish at the end.

Sian Berry
Green Party Member of the London Assembly