

## SAVE SWISS COTTAGE (Revised)

### Objection to Regal London's 100 Avenue Road 2025/0852/P

#### 1. Change of Appearance

At the first round of the new developers Regal London's community engagement in July, some of us requested that the cladding for the 100 Avenue Road 26 (AKA 24)-storey tower block be light in colour to blend in with the sky and surrounding architecture, unfortunately our views were only considered momentarily.

The red brick facia proposed would dominate the skyline and not be at all in keeping with the character and appearance of the surrounding architecture of the open space or the five neighbouring conservation areas. It would set a precedent for another ugly '[World's End Estate](#)' type cluster for Swiss Cottage. Red brick works well for low buildings but is too imposing for high rises. At least the white cladding of Essential Living's 24-storey tower would have fitted in with the Chalcots seen from the open space. Reducing overall window size would make the apartments darker internally, and more brick surface area and less glass to reflect light would add to its appearance of an industrial chimney stack.

~ The proposed brick style cladding is unacceptable. A soft white would be more appropriate, such as the Portland stone previously proposed and preferred by Camden.

#### 2. Increased Housing Units

In order to create 53 more housing units, Regal propose decreasing the unit heights and thickness of the superstructure slabs to squeeze in two more storeys in the tower block and one more in the lower block whilst keeping to the same approved height. An increase from 184 housing units to 237 would mean an increased burden on community facilities and the environment by 29%; at least 100 more residents than for the original scheme.

##### 2.1. Parking

The need for parking spaces is already at maximum capacity for local residents. Despite this being billed as a car free development, except for occupants with disabilities, the proposed Travel Plan Coordinator [Residential Travel Plan, #4] would not be able to monitor or prevent c. 500 new car owners from parking their cars locally.

The Inspector said in his Report [Summary of Recommendation, #46] "There would be a basement area providing 12 parking spaces for use by those with disabilities (and) secure parking for 240 cycles". Essential Living's current plan reflects this, but Regal is only proposing 8 blue badge parking spaces and 141 cycle racks. Is this an oversight?

~ The current s106 Agreement that disallows parking permits for 100 Avenue Road residents (except for those with disabilities) must be maintained.

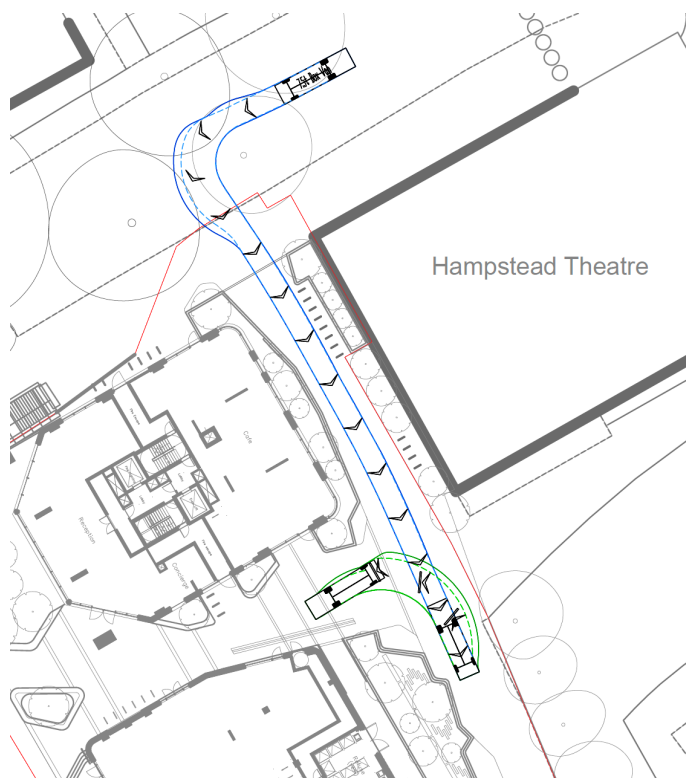
~ The inspector's recommendation for 12 parking spaces for use by those with disabilities and secure parking for 240 cycles" in the basement, must be reinstated.

## 2.2. Delivery, Servicing and Waste Management

The currently approved plan is to collect refuse from and deliver goods to 184 households using Winchester Road; the pedestrianised Market Square; the top end of the pedestrian path in the open space near the Hampstead theatre and the narrow ramp beneath it that opens onto Eton Avenue just east of the theatre. However, most deliveries and collections cannot be carried out via the theatre ramp given it is only 2.2 meters high and Amazon and Ocado vehicles or similar are typically 2.4 to 2.7 meters high, so one wonders how residents are going to get their essential deliveries.

Now Regal declare that 237 residential units “will generate an estimated 33-34 residential deliveries per day, 2-3 commercial deliveries per day and 1 community use delivery per day, equalling a daily delivery demand of circa 36-38 deliveries per day.” Even though this estimate seems unrealistically low, it is still too much traffic for a well established pedestrian market. No proper account has been taken of the constant danger to all who enjoy using this space freely and safely. No figure was given for the vehicle trip rates for these routes in Essential Living’s Draft Delivery & Servicing Plan in March 2014.

No account has been given as to how all the 140-240 cyclists are going to safely negotiate their daily journey from the basement and through the Hampstead Theatre tunnel/ ramp whilst small delivery vans and refuse carts are also having to use this same narrow route only wide enough for oneway traffic.



Nor has any proper account been given as to how people using the Leisure Centre or the tube between 6 and 8 am or early market stall holders are to be managed when the rigid 34 ft refuse trucks come in from the market and turn into the top end of the open space path near the theatre to collect the waste from 237 homes and the large retail centre. No frequency has been given for this operation. Traffic marshals can only do so much on an ongoing basis.

Fig.1  
Regal’s Vehicle Swept Path Analysis Plans  
Drawing No: TR002

**Now, with a 29% increase in households, the proposed plan is even more untenable.**

## 2.3. The Market

Already the Market is operating with half the stalls it used to before Essential Living routed their demolition lorries across the square, and this time it would be a continual stream of traffic **forever**, which would ultimately lead to the loss of the market altogether, which the community will not accept. An alternative viable solution could be to reroute all deliveries and collections to the A4, perhaps using the same or a variation of the route planned for construction.

~ The addition of the extra 3 storeys and 53 housing units to the granted scheme is unacceptable unless an alternative access/egress route is implemented for delivery, servicing and waste management, ideally from Avenue Road A41.

## 3. Change Tower Block from 'Build to Rent' to 'Market for Sale'

Regal proposes to change the initial planning permission for the Build to Rent modal for the tower block to 'Market for Sale' and to sell the lower block to a Housing Association for affordable rental.

Given Regal has a well established sales office in Dubai, agents in China and Hong Kong and do not deny that they have been selling London property to overseas investors for many years, it is likely that they will do the same with the 100 Avenue Road development. (E.g Regal London's Fulton & Fifth development in Wembley targeted international buyers.)

**Camden** ought to follow Labour's pre election pledge to crack down on foreign property speculators and ensure that 100 Avenue Road will not join the ranks of London's empty tower blocks. In 2024, the capital had almost 90,000 vacant dwellings.

**Many Local Authorities** faced with the problem of second home ownerships are now imposing restrictions on the sale of all new builds to those wishing to occupy them as their principal home i.e. 11 local Authorities in the Yorkshire Dales, St Ives and Whitby.

**Islington Council** has addressed the "buy-to-leave" issue by requiring developers to enter into Section 106 agreements ensuring that properties are used as dwellings and not left unoccupied for more than three consecutive months and must be occupied for at least 14 days within any three-month period. Non-compliance can lead to enforcement actions, including injunctions, and persistent breaches may result in fines or imprisonment. [Supplementary Planning Document \(SPD\)](#)

**First Homes Scheme** offers new-build homes at a minimum 30% discount off the market price for first-time buyers through Section 106 agreements, ensuring that new developments address the needs of the community. [House of Commons Library](#)

~ Planning conditions must be put in place that require 100 Avenue Road Developers to ensure that their property is sold with a covenant or condition that limits its use to primary residence only.

## 4. Affordable HA Lower Block

This diagram in [Design and Access Statement Part 6 of 6 - 12.3](#) gives a breakdown of the so called Affordable provision in the lower block. However no distinction is made here between units at “Affordable Rent”, i.e. 80% of the market rent, or units at “Social Rent”, i.e. c.37% of market rent, according to the "Accredited official statistics [Social housing lettings in England, tenancies: April 2022 to March 2023](#) Updated 6 March 2024”. These two categories are listed together for the same unit, so there is no way of knowing which level of rent a unit will be and the difference is considerable.

142 habitable rooms are listed as “Social/Affordable Rent” and 70 habitable rooms are listed as “Intermediate” - a percentage somewhere in between Social and Affordable Rent. So 2/3rds of the Affordable lower block could be at the highest level of 80% of the market rent based on Regal’s chart below.

We were told categorically and emphatically at the first community engagement event that all the affordable provision would be “Social Rent”. It is extremely disappointing that this appears not to be the case after all.

## 12.3 Unit by Unit Breakdown

### Lower Building Apartments

Level	Plot Number	Unit Type	Unit Area	Habitable Rooms	Tenure	Accessibility	Aspect	Private Balcony (sqm)
1	B.11	2B4P	73.0 m <sup>2</sup>	3	Intermediate	M4(2)	Dual	7.2
	B.12	1B2P	54.8 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5.1
	B.13	3B6P	99.0 m <sup>2</sup>	5	Social/ Affordable Rent	M4(2)	Dual	9
	B.14	3B6P	94.7 m <sup>2</sup>	4	Social/ Affordable Rent	M4(2)	Dual	9
	B.15	1B2P	57.1 m <sup>2</sup>	2	Intermediate	M4(3)	Single	5
	B.16	3B6P	123.1 m <sup>2</sup>	4	Social/ Affordable Rent	M4(3)	Single	9
	B.17	2B4P	86.5 m <sup>2</sup>	3	Social/ Affordable Rent	M4(3)	Single	7.3
	B.18	2B4P	77.3 m <sup>2</sup>	3	Intermediate	M4(2)	Single	7.2
	B.19	3B6P	110.8 m <sup>2</sup>	5	Social/ Affordable Rent	M4(2)	Dual	9.2
	B.110	3B6P	101.3 m <sup>2</sup>	4	Social/ Affordable Rent	M4(2)	Dual	9
	B.111	1B2P	58.2 m <sup>2</sup>	2	Social/ Affordable Rent	M4(3)	Single	5.1
	B.112	1B2P	52.0 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5
	B.113	2B4P	80.1 m <sup>2</sup>	3	Social/ Affordable Rent	M4(3)	Single	7.1
Total			1067.9 m <sup>2</sup>	42				

2	B.2.1	2B4P	73.0 m <sup>2</sup>	3	Intermediate	M4(2)	Dual	7.2
	B.2.2	1B2P	54.8 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5.1
	B.2.3	3B6P	99.0 m <sup>2</sup>	5	Social/ Affordable Rent	M4(2)	Dual	9
	B.2.4	3B6P	94.7 m <sup>2</sup>	4	Social/ Affordable Rent	M4(2)	Dual	9
	B.2.5	1B2P	57.1 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5
	B.2.6	3B6P	123.1 m <sup>2</sup>	4	Social/ Affordable Rent	M4(3)	Single	9
	B.2.7	2B4P	86.5 m <sup>2</sup>	3	Social/ Affordable Rent	M4(3)	Single	7.3
	B.2.8	2B4P	77.3 m <sup>2</sup>	3	Intermediate	M4(2)	Single	7.2
	B.2.9	3B6P	110.8 m <sup>2</sup>	5	Social/ Affordable Rent	M4(2)	Dual	9.2
	B.2.10	3B6P	101.3 m <sup>2</sup>	4	Social/ Affordable Rent	M4(2)	Dual	9
	B.2.11	1B2P	58.2 m <sup>2</sup>	2	Social/ Affordable Rent	M4(3)	Single	5.1
	B.2.12	1B2P	52.0 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5
	B.2.13	2B4P	80.1 m <sup>2</sup>	3	Social/ Affordable Rent	M4(3)	Single	7.1
Total			1067.9 m <sup>2</sup>	42				

3	B.3.1	2B4P	73.0 m <sup>2</sup>	3	Intermediate	M4(2)	Dual	7.2
	B.3.2	1B2P	54.8 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5.1
	B.3.3	3B6P	99.0 m <sup>2</sup>	5	Social/ Affordable Rent	M4(2)	Dual	9
	B.3.4	3B6P	94.7 m <sup>2</sup>	4	Social/ Affordable Rent	M4(2)	Dual	9
	B.3.5	1B2P	57.1 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5
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	B.3.8	2B4P	77.3 m <sup>2</sup>	3	Intermediate	M4(2)	Single	7.2
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	B.3.10	3B6P	101.3 m <sup>2</sup>	4	Social/ Affordable Rent	M4(2)	Dual	9
	B.3.11	1B2P	58.2 m <sup>2</sup>	2	Social/ Affordable Rent	M4(3)	Single	5.1
	B.3.12	1B2P	52.0 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5
	B.3.13	2B4P	80.1 m <sup>2</sup>	3	Social/ Affordable Rent	M4(3)	Single	7.1
Total			1067.9 m <sup>2</sup>	42				

4	B.4.1	2B4P	73.0 m <sup>2</sup>	3	Intermediate	M4(2)	Dual	7.2
	B.4.2	1B2P	54.8 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5.1
	B.4.3	3B6P	99.0 m <sup>2</sup>	5	Social/ Affordable Rent	M4(2)	Dual	9
	B.4.4	3B6P	94.7 m <sup>2</sup>	4	Social/ Affordable Rent	M4(2)	Dual	9
	B.4.5	1B2P	57.1 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5
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	B.4.7	2B4P	86.5 m <sup>2</sup>	3	Intermediate	M4(3)	Single	7.3
	B.4.8	2B4P	77.3 m <sup>2</sup>	3	Intermediate	M4(2)	Single	7.2
	B.4.9	3B6P	110.8 m <sup>2</sup>	5	Social/ Affordable Rent	M4(2)	Dual	9.2
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	B.4.11	1B2P	58.2 m <sup>2</sup>	2	Social/ Affordable Rent	M4(3)	Single	5.1
	B.4.12	1B2P	52.0 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5
	B.4.13	2B4P	80.1 m <sup>2</sup>	3	Intermediate	M4(3)	Single	7.1
Total			1067.9 m <sup>2</sup>	42				

5	B.5.1	2B4P	73.0 m <sup>2</sup>	3	Intermediate	M4(2)	Dual	7.2
	B.5.2	1B2P	54.8 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5.1
	B.5.3	3B6P	99.0 m <sup>2</sup>	5	Social/ Affordable Rent	M4(2)	Dual	9
	B.5.4	3B6P	94.8 m <sup>2</sup>	4	Social/ Affordable Rent	M4(2)	Dual	9
	B.5.5	1B2P	57.1 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5
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	B.5.7	2B4P	86.5 m <sup>2</sup>	3	Intermediate	M4(2)	Single	7.3
	B.5.8	2B4P	77.3 m <sup>2</sup>	3	Intermediate	M4(2)	Single	7.2
	B.5.9	3B6P	110.8 m <sup>2</sup>	5	Social/ Affordable Rent	M4(2)	Dual	9.2
	B.5.10	2B4P	80.1 m <sup>2</sup>	3	Intermediate	M4(2)	Single	7.1
Total			856.5 m <sup>2</sup>	34				

6	B.6.1	2B4P	73.0 m <sup>2</sup>	3	Intermediate	M4(2)	Dual	7.2
	B.6.2	1B2P	54.8 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5.1
	B.6.3	3B6P	99.0 m <sup>2</sup>	5	Social/ Affordable Rent	M4(2)	Dual	9
	B.6.4	2B4P	80.1 m <sup>2</sup>	3	Intermediate	M4(2)	Single	7.1
Total			306.9 m <sup>2</sup>	13				

7	B.7.1	2B4P	73.0 m <sup>2</sup>	3	Intermediate	M4(2)	Dual	7.2
	B.7.2	1B2P	54.8 m <sup>2</sup>	2	Intermediate	M4(2)	Single	5.1
	B.7.3	3B6P	99.0 m <sup>2</sup>	5	Social/ Affordable Rent	M4(2)	Dual	9
	B.7.4	2B4P	80.1 m <sup>2</sup>	3	Intermediate	M4(2)	Single	7.1
Total			306.9 m <sup>2</sup>	13				

Fig.2

~ “Affordable Rent” and “Social Rent” need to be defined and distinguished from one another at this stage to have any meaning.

~ Maximum “Social Rent” ratio is needed to satisfy the dire need for more social housing.

## 5. EIA - additional impact

Before we had the opportunity to comment during the community engagement, Camden determined that an EIA was not considered to be required based on that having been the decision for the previous application - for no good reason. No account has been given of the impact the 29% increase in dwellings would have on the environment.

~ Because this is effectively a new application, an EIA should be carried out on the impact of the development as a whole - taking into account the additional impact the 29% increase in dwellings would have on the environment.

## 6. Construction Management Plan (CMP)

Comparing Regal's CMP with Essential Living's last approved CMP is not easy because most of Regal's diagrams/ illustrations are illegible due to low resolution.

The market has been deleted from Essential Living's list of stakeholders that are in **close proximity** and a **nearest potential receptor** likely to be affected by the activities on site [#7. Page 11 and #8. Page 12].

In addition in CMP Part 3, the previous routes for the market and Winchester Road are still given and we've been assured they will not be used for construction.

~ Please can you request that Regal update their CMP with clear, high resolution diagrams and reinstate the Market as a prominent Stakeholder. Please also request that Regal either delete the Winchester and Market vehicle routes from the CMP or clarify.

## 7. Microclimate changes

Why has Regal submitted a different [Wind Microclimate Assessment Report](#) February 2025 by GIA to Essential Living's 2014 [Wind and Microclimate Assessment](#) by RWDI, as granted by the Inspector? All the Beaufort wind force scale receptors are now in different places. GIA only shows the location of the receptors whereas RWDI shows both location and the severity of wind speed.

For example wind speeds at Receptor 7 on the pedestrian path between the tower block and the Theatre occasionally exceeds Beaufort Force 7 (B7): "Wind speeds in excess of B7 would impede walking.." Also Receptor 2 just north of the tower block in Eton Avenue and receptor 12 in between the blocks where the Avenue Road tube entrance is, both have wind speeds in excess of Beaufort Force 6 above baseline levels. So it is hard to know how Regal is mitigating excessive wind speeds in the open space while GIA do not consider the RWDI receptors criteria relevant.

~ Given all these major changes and amendments (and no doubt more onerous comparisons that take too long to investigate), this application is equivalent to an entirely new application and should be considered as such by the planning committee .

## For the Sake of Transparency

Please request from Regal the FULL list of comments/ feedback (with names redacted) they received on their proposed changes beyond their selective summary in their Statement of Community Involvement, and kindly post it on the planning portal along with the other comments to this application, in the same way Essential Living obliged us previously.

For the record - Regal's claim that "10,000 Flyers (were) issued over the course of both rounds of consultation" is in question given that a number of us who live closest to the site did not receive flyers on either occasion. Save Swiss Cottage and some of our local Councillors made efforts to inform everyone about the community engagement events, hence the 103 attendees and many responses.

**~ Given the extra environmental impact due to the 29% increase of dwellings, this application should be rejected.**

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I look forward to your response to these requests.

Many thanks,

Yours Sincerely,

Janine Sachs

BE REALISTIC-PLAN FOR A MIRACLE

**SAVE SWISS COTTAGE**