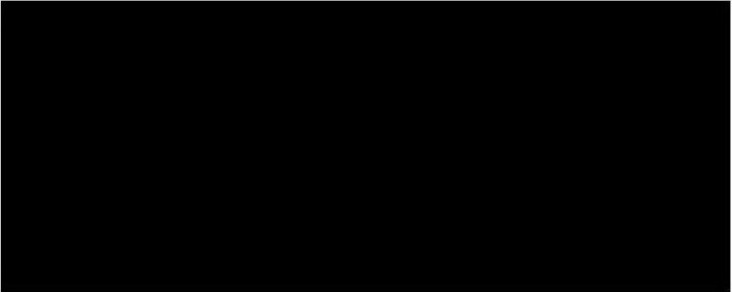


Swiss Cottage, the gateway to the north is a vital hub between London and the north ....any further congestion will seriously impede the flow of traffic to both the suburbs and the important motorway network to the north of England. Similarly, access to Central London will be severely affected. This is already near breaking point and this would grid lock north west London.

Yours sincerely,  
John and Pam Lucad



Re: Application ref. 2014/1617/P  
100 Avenue Road, Swiss Cottage

July 8, 2014

**Transport Issues and Access to the Development**

Dear David Fowler

The section on **Transport** in the Conclusion of the Mayor's Stage One planning report on the 100 Avenue Road development (24 April 2014) advises that further discussions with TfL are necessary in regard to construction logistics and deliveries to the site – but only in the context of TfL's gyratory improvement works. **This is disingenuous and designed to deflect attention away from the real problems of access to the site.**

I quote from the Conclusions in the Mayor's report:

***"Further discussions are necessary with TfL to explore options for Swiss Cottage underground station, agree financial contributions towards public transport upgrades, and agree construction logistics and timings for delivery in the context of TfL's gyratory improvement works."***

This statement conveniently omits any mention of the effects on the local community and public spaces in Eton Avenue. It is a red herring designed to draw attention away from the possibly insurmountable concerns about **general** access to the site both during the construction phase and after. It implies that the only logistic problems with the site are tied in with proposed improvement works on the gyratory system - whereas the real problems are zero access from the A41 and extremely limited access from Eton Avenue and the underground car park (ridiculous!) of the Hampstead Theatre.

However, in the body of the Mayor's report, it does make mention of this issue:

*"Vehicular and servicing access will be via Eton Avenue...in order to minimise any impact on the TLRN. Larger vehicles would ...need to unload at grade to the rear of the site...further discussion is necessary on this in order to minimise any impact on pedestrians or the operation of the adjacent street market."* (par.81)

This aspect is perhaps one of the most ill –thought out and wishful - thinking aspects of the entire proposed development. To talk about **"minimising"** any impact on the pedestrians using the public walkways and on the street market is ridiculous when the fact is that the building works necessary for such an immense project will **decimate** these spaces.

Indeed, TfL has flagged up these concerns:

*"TfL has concerns about the impact of the ...proposed site access arrangements during the construction period ...and further discussions with TfL are necessary to ensure that works are coordinated."* (par.82)

And

*"The access arrangements include three temporary (1-3 years?) construction crossovers from Avenue Road, which TfL is unlikely to permit...as they would significantly increase conflicts between construction vehicles and other traffic. The applicant should therefore review their arrangements within the CMP (CMP Resolutions – TfL's independent investigation contractor)."* (par.83)

And

*"TfL requires a full construction logistics plan (CLP)...The submission of the finalised CLPs for both the demolition and construction phases should be secured by conditions for approval by Camden Council in consultation with TfL."* (par.84)

So, it is clear that both TfL and the GLA say that further discussion must take place and that Camden Council must see the final plans for both the demolition and construction phases in order to grant or deny approval.

I therefore strongly request that the Council gives careful consideration to the realistic physical viability of the proposed development, given the immense and very real physical constraints and the undeniable major detrimental impact it would have on the local and wider community who use this space.

Just where are all those lorries, enormous cranes, massive piling rigs, diggers, dump trucks, delivery trucks, mounds of earth, enormous steel girders going to go? And how on earth will they get to the site in the first place? Where can the site handling facilities and site maintenance facilities be located? Where will materials be stored? There is no spare space on this development site.

The truth of the matter is that the whole "access" area would have to be shut down and commandeered for several years while the building works are in progress.

And, when construction was over, the only access vehicles, cars, taxis, refuse and delivery vehicles would have to this massive development would be through – yes, again – the public open space in Eton Avenue and the site of the street market and meeting space outside the Hampstead Theatre.


In short, the site for the proposed development is land-locked with no truly viable means of access to service all that is proposed.

I strongly request that the Council refuses planning permission.

Yours sincerely

Edie Raff

Save Swiss Cottage



Re: Application ref. 2014/1617/P  
100 Avenue Road, Swiss Cottage

July 9, 2014

**Serious Contradiction in Mayor's Report**

Dear David Fowler

The Mayor's Stage One planning report on the 100 Avenue Road development (24 April 2014) reaches conclusions that contradict what it says in the body of its report. The abbreviated section (Conclusion) of the report says that the Mayor gives strong support to an issue that in the body of the report it wants to see further addressed before the scheme is referred back to the Mayor. **This is highly contradictory and misleading.**

In more detail, in the Conclusion, the report is strongly supportive of the urban design:

*"The layout of the scheme, ground floor activity and appearance of the building are **strongly supported**, and **no objection** is raised on the **massing and building height**."*

But within the body of the report it says:

*“The architecture was at a fairly **early design development stage**” (par.50) and*

*“...as Policy 7.7 states, for a building of this height and prominence to be **acceptable**, its **design** needs to be of an **outstanding quality**.” (par.54)*

And

*“...in order for high density to be acceptable, the housing should be of **exemplary design**...” (par.45)*

How can the GLA “strongly support” the layout, appearance, massing and building height of a design when the only plans it has seen are in an “early” stage of development – let alone determine from those early stage designs that the design is “exemplary” and of “outstanding quality”?

In addition, it should not be assumed (as the Mayor appears to) that “architecture” or “design” is simply the wallpaper or surface treatment of a building, whose “massing and building height” are somehow determined by other means, eg by a mathematical formula. I put it to you strongly that the architecture and design of this development encompasses ALL aspects, including the massing and building height. And I request that ALL of these aspects are reviewed by the Council and appropriate professional advisers (see below).

Before accepting the GLA’s glib approval of this design, I strongly request that the Council demands to see a final version of the design proposals for the purpose of a thorough detailed design review. I also strongly request that the Council seeks the formal advice on the proposed design from a panel of independent Architects, who are capable of assessing the design in all respects; especially given the need to achieve “outstanding quality”. Unless this process is carried out rigorously and under full public scrutiny, how else can the Council satisfy itself regarding the quality, appropriateness, size of development, etc? And how else can it be determined whether or not the design fulfils the criteria of “outstanding quality”?

You cannot but be aware that numerous objections have been raised regarding the current design proposals, by members of the public and well qualified professionals, including experienced Architects. There is great concern that the proposals represent over-development, that the massing is entirely inappropriate (particularly regarding the tower), that the design is banal and of poor quality, and that the proposals are entirely unsuitable for this location. There is also great concern about detrimental effects of the tower on the public spaces in close proximity to the site. And, as you are no doubt aware, the site is in close proximity to several Conservation Areas, which many objectors feel will be considerably harmed by the proposed development.

And in the interest of fairness, it is only right that this same independent panel of Architects should be asked to make a similar appraisal of the building currently occupying the site which the Mayor’s report – arbitrarily – pronounces to be “of little architectural merit.” (par.7)

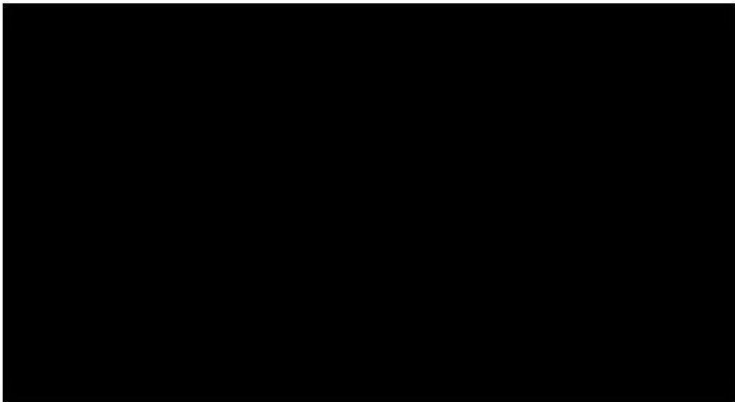
I have brought this worrying contradiction in the Mayor's report to your attention so that it will not get lost in the Mayor's rush to approve a building scheme that will give him 184 more housing units. I trust that you, like the Mayor himself has professed, will want to see more finalized plans of exemplary design before you can even consider recommending this development for approval.

I strongly request that the Council refuses planning permission.

Yours sincerely

Edie Raff

Swiss Cottage Action Group/Save Swiss Cottage



**Re: Application ref. 2014/1617/P**

**100 Avenue Road, Swiss Cottage**

July 11, 2014

Dear David Fowler

Following on my recent letters highlighting serious anomalies in The Mayor's Stage One planning report, I would now like to raise questions about some "smaller issues" that are within the body of the report, but which nonetheless matter a great deal:

Paragraph 5:

*"The site is located on the **corner of Finchley Road, College Crescent and Eton Avenue**"*



I include this small quibble in this letter only because I think it is indicative of the cavalier attitude and lack of thoroughness and accuracy that was brought to the entire report. The site is on Avenue Road and is not located on a corner.

Paragraph 13:

*"...with a vertical component on the southern end ....to be used by a local charity, The Winch."*

This paragraph gives no indication of the height of the "vertical component", which is possibly going to be another contentious tall building.

Paragraph 23:

*"the development presents a significant opportunity to revitalise this part of the centre to create an attractive focus of activity for the local community..."*

It is absurd to suggest that this part of Swiss Cottage is in need of revitalisation. Great effort has been put into the re-design and revitalisation of this area over the last 10 years, with huge contributions to that effort made by Camden Council, the local community, and others. There is already the attractive, vital and well-loved focus of activity in the new public green space and water pool; there is the successful local street market at the west end of Eton Road; there is the beautifully restored listed public library; the Hampstead Theatre (re-built just a few years ago); football pitch, infant's playground, and the much used new public sports centre and swimming pool. There is also the recently refurbished Odeon cinema and IMAX, the Swiss Cottage pub, and many cafes, restaurants and local shops. The Finchley Road area (on the doorstep) already has a large selection of shops, cafes, restaurants, banks and other facilities. This location is already an important and vibrant place used by local people and those further afield.

In my view the proposed development will do nothing to revitalise this already revitalised local area. In fact its presence will bring detriment and physical damage to the local environment, the adjoining Conservation Areas, the existing well loved facilities, and local streets as attested to in the almost 1000 letters of objection that have to date been sent to the Council.

Paragraph 28:

In its report, the GLA waxes eloquent about the potential for a more professional rented sector with *"a single owner for a whole block who is committed to the local area..."*

In all seriousness, it cannot be argued that Essential Living has a long term commitment to the area. It will not be possible under the law for the Council to apply Conditions to a planning permission that require EL to remain involved as owner or landlord of the property, or indeed to require any owner to keep the flats rented, as opposed to sold on long leases to owner occupiers and/or buy-to-let landlords. In fact EL would be perfectly within their legal rights to build the development and then keep some or all of the flats empty whilst property values rise, as is the case with a number of high profile residential developments constructed recently by investors in London.

The truth is that this proposed development is about property development and maximising the development potential of the site to maximise monetary profit. The developer's supposed "commitment to the local area" is widely seen as bogus and the cynical ploy that it is.

Paragraph 29:

*... "the scheme will provide a range of unit sizes **with a good proportion of family sized units at 22.8%**" ... GLA officers are also pleased to see that 38% of this proportion has been allocated for affordable rent."*

So, 38% of 22.8% - i.e. **only 8.6%** of these units will be allocated to "**affordable**" family units.

Does this comply with The London Plan's affordable housing percentages? I think not.

Will Essential Living be allowed to get away with providing no social housing and insufficient affordable housing in this development by the common practice of giving funds in lieu under a Section 106 Agreement – for the Council to use **somewhere else** to fulfil these obligations? While beneficial for the developer, a Section 106 get-out clause would clearly do nothing to fulfil these essential and important mixed tenure obligations within the development on the site itself.

Paragraph 32:

*"GLA officers recognise that the current mechanisms for assessing viability are not sufficiently refined to differentiate PRS developments from those built for sale."*

If current mechanisms for assessing viability cannot differentiate between PRS developments and those built for sale - how, then are the GLA officers going to assess its viability? And if they cannot assess it – how can the scheme go ahead?

This sounds like a fudge by The Mayor...and I hope the Council will insist on the matter of viability being treated with rigour and as a priority as part of their consideration of the proposals.

Paragraph 39:

*“shared amenity space will be provided in the form of external roof terraces.”*

Maintaining a garden and roof terrace in the grimy and windy conditions that will prevail on these terraces will require a great deal of maintenance and upkeep. Where is the written provision for the upkeep of these common external “gardens”? The Council must at the very least require that EL provides a Landscape Management Plan for all external areas and landscaped areas, as part of the planning application, prior to consideration by the Council.

Paragraph 74:

*“The trip generation...shows that the development is predicted to generate only 21 two-way vehicle trips in the evening peak, and any impacts on the TLRN (Transport for London Road Network) would be insignificant....”*

This is wishful thinking! With a possible 400 adults living in the development, this figure of only 21 vehicle trips – in the evening peak – can only be wildly optimistic and inaccurate. There will be normal comings and goings to and from this huge development at all hours of the day and night. There will be deliveries of on-line supermarket and on-line shopping to tenants at all hours and 7 days a week daily and taxis, service vehicles, visitors arriving by car, specialist vehicles and ambulances, etc.

I simply do not believe the figure quoted, and request that the Council seeks specialist advice from its own Highways Department and from an external consultant to take its own view on the traffic generated by this development.

And by the way, and nowhere considered in the application, where will visitors to the development park their cars after 6.30pm on weekdays and at weekends? Simple answer...in the CA-B residents parking bays in the nearby streets, which are already very over-subscribed, and which are already used by CA-B permit holders from other parts of the CA-B zone who park in this immediate area to get access to the Jubilee line at Swiss Cottage tube station. There is no spare parking capacity in this area. None whatsoever!

Paragraph 77:

*“The proposed layout indicates that a taxi drop-off bay could be provided on Avenue Road...which will conflict with the highway proposals referred to above...TFL does not consider that there is sufficient demand to justify a dedicated taxi facility given the limited demand for taxi-use as predicted from this development.”*

Is this not also wishful thinking? Is it possible that this huge building will have no front entrance for taxis or cars to pick up/drop off passengers, children, old or disabled people, parcels, luggage, food shopping? Is it possible that this huge building will have, in effect, no front door?

Paragraph 90:

*“The applicant [Essential Living] has had pre-application meetings with Camden Council, although **the Council’s position on the formal planning application is unknown at this stage.**”*

While the Council’s position may or may not be known at this stage, what we do know is what the Mayor’s position is: he broadly supports this development and has said so well before the consultation process has ended; he labels all objectors to planning applications “Nimbies” (LBC State of London Debate; June 25, 2014); and he so single-mindedly wants to see houses built in London that he tramples over the democratic wishes of local councils, local objectors, and even a majority of the members of his own GLA.

Again, I strongly urge the Council to refuse planning permission for this development and I urge it to take all necessary steps in its power to ensure that The Mayor does not grant planning permission either. The proposal represents massive over-development of the site and it is ill conceived and of poor design. The effects of this development on the local area, local residents, local facilities and local Conservation Areas will be extremely detrimental. Put very simply, it has no business being here!

Yours sincerely,

Edie Raff

David Fowler  
Camden Council Planning Department  
6th Floor, Camden Town Hall Extension  
Argyle Street  
London WC1H 8EQ

Monday 14<sup>th</sup> July 2014

Dear David

I am writing to you in relation to the proposed development at 100 Avenue Road.

There has been a lot of change in this part of Swiss Cottage in the last 15 years, much of which has brought benefits to the area. However, in many cases the benefits have been for those who can afford expensive theatre tickets or use of the leisure centre, and for adults rather than for children. There is a need for more free provision focused on the needs of children, young people and their families in the Swiss Cottage area, and the Winch is the only organisation which is currently providing this.

The Winch does fantastic work, supporting any child, young person or parent who needs it in the local area, but it does so out of an old and increasingly unsuitable building. It is not accessible for those with disabilities, and it is expensive to heat and maintain. It appears that the building requires a £4.5m refurbishment in order to be brought up to the standard which a new, purpose built site would offer.

As there is a new development planned so close to the Winch's current home, it is vital that this opportunity is taken to ensure that frontline services and support for children, young people and families is delivered. As the key strategic provider in this part of the borough and working with 1,200 people each year, the inclusion of facilities for the Winch represent the best chance of having a long term, fit for purpose site which will sustain its work into the future.

I very much hope that when considering this application you take into account the wider community benefits, and particularly those for children and young people in the area, that would come from providing the Winch with a new home.

Many thanks and best wishes

Fran Bury

13 Kingswear Road, London NW5 1EU