



# *The Heath & Hampstead Society*

F.O. BOX 38214 LONDON NW3 1XD

The Society examines all Planning Applications relating to Hampstead, and assesses them for their impact on conservation and on the local environment.

## **To London Borough of Camden, Development Control Team**

Planning Ref: 2014/1617/P

Address: 100 Avenue Road Swiss Cottage NW3

Description: Redevelopment; 184 flats; including 24-story tower block

Case Officer: Conor McDonagh

Date 11 April 2014

This proposal is located a short distance outside the area in which we normally confine our comments, but its impact is such that it would affect many parts of Hampstead, and Hampstead Heath. Long-distance views of this tower block would intrude on many historic and publicly important areas.

We object to the proposal on these grounds:

### **1. Demolition of existing building**

The present building, 100 Avenue Road, is one of Ted Levy's best buildings; he did not design many non-residential buildings, so this is unusual. More to the point, it is architecturally of much higher quality than many of those surrounding it, and its loss would be a loss to the architectural environment of Swiss Cottage.

### **2. Overdevelopment/bulk**

The proposed new buildings are grossly over-sized, and would dominate the Swiss Cottage area overbearingly.

Until quite recently, development bulk was controlled by the application of standards related to the character of the area. Commercial buildings were assessed by plot ratios: the ratios of building floorspace to site size. In an area such as Swiss Cottage, the maximum permissible plot ratio would have been approximately 3 or 4:1.

Measured on this basis, this proposed building would have a plot ratio coverage of between **8:1 to 9:1**; that is, more than double what for decades was considered to be reasonable, and would be thought high for Central London areas. Swiss Cottage is not Central London. What justifies such a massive increase? Presumably, developers' profit.

(our calculations are given as approximations; the applicants do not reveal basic information such as site area or gross development floorspace)

Previous development controls assessed housing by standards based on habitable rooms per acre/hectare. A modified version of this appears in LDF Policy DP3—Policy 3.9 refers to a "density matrix" for Camden of between 45 and 405 dwellings

per hectare, or an average of 225 h.r/Ha. This application proposes a density of no less than **1320 h.r/Ha**, 5.8 times the average quoted density, or 3.25 times the maximum.

Swiss Cottage is not Central London, where high commercial, or residential densities might be considered appropriate. It is an average residential and local shopping area.

However development bulk is measured, it is clear that such a preposterously inflated density is completely unjustified and inappropriate here.

The grossly inflated density leads, of course, to the excessive building height proposed.

### 3. Height

Claims are made in the application that the building's 24-floor height responds to "opportunities" offered by the presence in the vicinity of other tall buildings: the office buildings in Finchley Road, the newer Visage Building, and the Chalcot Estate tower blocks. But none of these are higher than 11 floors, and they present no comparable precedents.

Tower blocks have for many years been a discredited building form for housing---some, dating only from the 1970/1980 period have even been demolished, they are so unsuitable and unpopular. It would be a retrograde step to build more.

The impact of this excessive height on places not only in the vicinity but miles away would be unpleasant and intrusive. It would be visible from as far away as parts of Hampstead Heath. There is nothing exciting or interesting about the sight of a tower block, and the thought that it could itself become a precedent for more towers---a Northern Canary Wharf---is quite appalling.

The development is described in the application as a "landmark"; this is a meaningless term, and we certainly don't want one here.

Its height would also have unpleasant and unacceptable side-effects, on over-shadowing, overlooking and loss of local privacy, and wind down-draughts, all uncalled-for. These are issues we understand will be addressed by our neighbouring conservation group, the Belsize Residents Association.

### 4. Architecture and the setting of adjacent public buildings.

The least that might be expected of such a huge and massively conspicuous building is that its architecture should be of a high standard. LDF Policy DP24 *Securing High Quality Design* should surely apply here. Policy 24.7 would seem to be particularly appropriate.

In fact, this design is crude, poorly proportioned, of a overbearing and oppressive character, which would damage the setting of all its notable neighbours: the listed Basil Spence Library, the Hampstead Theatre, the Rick Mather Leisure Centre, some

of the Central School buildings, and above all the fine newly-created open space in the centre of the site. The site was originally designated as the new Civic Centre of what was then the Borough of Hampstead, and although only partly completed, it forms a notable composition of civic and cultural buildings. It would be outrageous if this were to be harmed.

Whatever size, height or bulk is considered for this site, it must be of first-class architectural quality. This proposal falls far short.

#### 5. Affordable housing

The development provides 184 flats, of various sizes. Of these, **36** are designated as affordable.

LDF Policy DP3 calls for 50% of new housing of more than 10 units to be affordable. 50% of 184 is **92**

36 is **19.56%** of 184.

The applicants claim that 25% of the flats would be affordable. 25% of 184 is **46**, not 36. They also refer to this being in accordance with the “economics and viability of the development”. By this they presumably mean that they propose to retain high levels of profit.


The discrepancies between these figures are extraordinary, and the applicants are plainly offering a substantially diminished number of affordable flats; the shortfall seems to be 92 minus 36 = **56**. There is no mention of any offset Section 106 Agreement, providing financial compensation to Camden to help deal with the chronic shortage of affordable housing.

This looks to us like the applicants running rings around Camden and its agreed policies.

Overall, this is a monstrous, overscaled, environmentally harmful and ultimately unsustainable development which would cast a blight on the whole area, including substantial parts of Hampstead and the Heath.

Please refuse.





Dear Sir / Madam,

I am writing to object to the proposed development on the following grounds:

1) The size of the development is completely out of proportion with the surrounding area. It goes without saying that the proposed height will be detrimental to residents of the area in terms of light and outlook. The council has performed a lot of excellent work improving the appearance of the area in recent years (notably the square, fountain and leisure centre); this monstrosity of a tower would completely overshadow that. I have worked in the real estate sector for a number of years and would never dream of applying for planning for such a gargantuan building in an area like Swiss Cottage

2) The building does not fit in with its neighbours and sets a dangerous precedent for the area. What is to stop other developers from seeking similarly large towers in the future? The proposal is at least 4 times the height of other buildings in the area and thus puts them at risk

3) Swiss Cottage has a thriving local community. Disruption has already been caused by the new school, and adding so many new residents will further complicate matters. There are already complications regarding a shortage of parking. It simply isn't feasible to add so many new residents to a densely populated area which houses a large school

4) The access to the site down narrow Winchester road will cause major disruption in this area and the congestion will be considerable

5) The existing buildings are fit for purpose and there is no good reason to replace them

I urge you to reject this planning application,

Sincerely,

Mr Joseph Basrawy  
49 Visage Apartments, Winchester Road, [NW3 3ND](#)

[REDACTED]

The Coach House      7a Netherhall Gardens      London NW3 5RN

[REDACTED]

**Proposed Development at 100 Avenue Road London NW3 3HF**  
Camden's application reference: **2014/1617P**

The proposal to demolish the office blocks at 100 Avenue Road, built in the 1980s, and replace them with two blocks, mainly of flats, one of 7 and 5 storeys and the other of 24 storeys, is one on which we wish to submit our comments. We have deep concerns from transport, social community, health and environment and aesthetic perspectives.

We do not live in the immediate vicinity of Swiss Cottage. However, as long-term local citizens, we care deeply about the character and quality of developments in strategic locations such as this one, particularly as they are highly likely to influence future planning decisions in the area. One of us was leader of the Architectural Team responsible for the existing development on the site, and the other has been a social scientist for the last 44 years, previous to which he was, for 13 years, a local architect and town planner.

**1. Vehicular access**

Direct access would not be possible from the heavily-used Swiss Cottage gyratory road system. This would inevitably have serious short-term impacts during the demolition and re-building phase, and long-term ones because the development, including its commercial components, would have to be serviced through residential streets in its hinterland. At a local meetings last year, the developers explained that no parking provision was proposed other than a few bays for handicapped people. When questioned on this issue, the response was that residents owning cars would have to park them "somewhere else".

Clearly, given Camden's policy on developments well served by public transport, and in light of the significant insufficiency of kerb-side parking places in the immediate area, as in this instance, Camden would have to make it an

explicit condition of residency in the proposed flats that tenants would be allowed neither on-street nor off-street parking.

## **2. Social profile and community cohesion**

We understand that the flats would be rented on 3- to 5-year tenancies. Thus, they would be occupied by a transient population, almost exclusively single people and couples. So much for integration with the local community! In fact, it could be argued that these short-term occupants would have a parasitical relationship as they would be relying on local services and amenities but unlikely to contribute to community activity. The far greater need in this area is for affordable social housing for people engaged in maintaining London's essential social and other public services, the shortage of which is reaching critical levels. Yet the proposal earmarks only one in seven of the flats for this form of housing. Moreover, the description of the character of the proposed development suggests strongly that few if any of the tenants would be employed in these services.

When the existing building was planned in the 1980s, the brief for its developer, architect, and Camden's chief architect, expressly referred to the need to protect and improve community facilities. This resulted in the office block stepping down to respect the more human scale in physical and aesthetic terms of the listed and well-functioning library. Under Camden's 'Planning Gain' rules, a nursery, a five-a-side football pitch, an improved market square, public lavatories (now demolished), squash courts, and a pedestrian footpath to Winchester Road were added

## **3. Environmental concerns**

Whilst the appropriate site for a 24-storey block of flats might be a matter of opinion, its environmental impacts are matters of fact. The first is overshadowing. At present, the public open space provides several attractive locations for sitting out and for children's and adults' play – facilities in short supply in the neighbourhood. For most of the year, the sun can reach much of it. The path of shadows of the two blocks of the proposed development - one with a height of about 200 feet - over the surrounding area indicates that the shadows would greatly exceed the existing shadow, reducing still further the days and times of the year when the local population could benefit from enjoying the site's public open space and sunny locations.

Second, pedestrian discomfort from the high winds generated around the base of tall buildings can by no means be discounted. In addition, around the clock noise from high volumes of traffic at this major road intersection would be very likely to oblige flat occupants to keep their windows closed at all times – not a very attractive prospect, especially during the summer.

Third, and in many respects most significantly, there is the subject of air quality. A policy statement last month on this subject by Owen Patterson, current Secretary of State at the [Department for Environment, Food and Rural Affairs](#) - "protecting and enhancing our urban and natural environment to improve public health and wellbeing"-

specifically cited air pollution, for example from road transport, as having an effect equivalent to 29,000 deaths each year and is expected to reduce the life expectancy of everyone in the UK by 6 months on average, at a cost of around £16 billion per year.

Our concerns about the relevance of this development to this domain of public policy were underlined as recently as two weeks ago when the public, especially those with respiratory problems, had to be advised to limit their exposure to the dangers of poorer air quality partly attributable to emissions from vehicle exhausts. The response of the Paris administration was to prohibit vehicles (identified by their registration plates) to be used on the roads on alternate days. Such events are forecast to increase in frequency.

We therefore question the advisability of locating 184 flats adjacent to the heavily polluted Finchley Road. This particular concern appears to be wholly validated by recent research undertaken by a respiratory toxicologist at Kings College London who has warned of a significantly greater incidence of asthma and other respiratory diseases in areas of high air pollution – now second only to smoking as an avoidable cause of death, and by a House of Commons Environmental Audit Committee which reported on highly disturbing evidence that, among the most vulnerable in the population, air pollution reduces longevity by nine years.

Camden's website shows a nearby monitoring station. Levels of nitrogen oxides and fine particulates recorded at it are of such concern that it is designated a TfL 'focus area'. Traffic is almost exclusively the source of harmful-to-health pollution linked to premature deaths in London each year. This raises the question of the advisability of locating the 184 flats to this heavily trafficked intersection.

#### **4. Aesthetic considerations**

Finally, we draw the Council's attention to a critical *visual* aspect of the proposed development. Owing to the extreme height of the 24 storey block of flats, it will break the skyline for a considerable distance around it in a highly prominent way. The impact of this would be especially damaging to the adjacent Conservation Area as its upper floors would create an unfortunate and visually upsetting backcloth to the largely 19<sup>th</sup> century housing in it. Such impacts are regrettably commonplace: a local one can be seen on a walk up Primrose Hill when the *top* floors of the tower blocks on Adelaide Road (albeit with significantly fewer floors than proposed in this instance) slowly, increasingly and incongruously come into view.

We will leave it to others to comment on the design considerations of the proposal as views on this are very likely to vary widely and it is more difficult to make a definitive judgement which is likely to command broad support.

#### **Conclusion**

We feel strongly that these considerations should be taken into account in *any* major urban 'intervention'. Yet the proposals for which planning permission is being sought here show little awareness of or concern about them. Whilst the scheme would benefit the developer and Camden's rates revenue, in our view, it would cause



considerable long-term damage to people living and working in the vicinity and to the quality of their environment – as well as perhaps setting a dangerous precedent for future developments in this part of Camden.

*Dr. Mayer Hillman, Senior Fellow Emeritus, Policy Studies Institute.*

*Peter Rich, , Leader of the Architectural Team for the existing 1980s development on the site.*

*10 April 2014*



Conor McDonagh

Regeneration and Planning development Management

London Borough of Camden

Town Hall Judd Street

London WC1H 8ND

Dear McDonagh ,

**RE: OBJECTION**

**100 AVENUE ROAD, LONDON NW3 - PLANNING APPLICATION 2014/1617/P**

We have been residents of Eton Avenue since 1986 and as such are very familiar with the surrounding area, the type of lifestyles and usage of the area and its general ambience.

In the past we have welcomed the changing developments and modernisations that have taken place in the built & open spaces in the vicinity of Swiss Cottage Tube station such as the conservation of the Library, redevelopment of the Sport Recreation Centre, the green open space with wonderful water feature and of course the new Theatre. The relocation of the market has also been of benefit to the residents and general public and works well. This area is also enjoyed widely by Central School of Drama, which is another vibrant asset to the locality.

We also enjoy high rise buildings which have been designed well and are set in surroundings within a proper context.

We would very much like to hold on to the character that exists and has been sensibly created by planners and architects both from period times and of recent times. Any constructions that would potentially damage this fabric we feel should be avoided at all costs.

We therefore **STRONGLY OBJECT** to the application to demolish the 6 story building above Swiss Cottage Tube station. Even more so we object to the monstrous replacement that has been proposed. Our reasons are abbreviated below but are not inclusive of many other objections that we have:

1. 1. Size: the proposed building would be totally out of scale in its size and mass in relation to its surroundings. It is important that the predominantly low rise Victorian and modern buildings which prevail in the close adjacent streets are not overwhelmed by the imposition of a building of 24-storeys. It also far exceeds in height any other building on Finchley Road. It would be grossly out of scale and out of place.
2. Light Deprivation: The proposed building would adversely affect the open green recreation space with water feature, the market area and the green social space of Central School by causing severe depletion of light/sunlight. The open spaces belong to the public and it is an gross insult and imposition on their 'citizens' rights.
3. 3. A building of such height would be visible from a great distance within the conservation area and dominate totally the areas in close proximity.
4. The proposed 24-storey building is of no architectural design merit whatsoever. It is a throw-back to rather poor 1960's architecture. The location is at present well served by the current building, the design and size of which is generally regarded as acceptable. It was more 'iconic' however, when the original windows were deep red in colour, which was probably the original Architects' intention.
5. The high-rise residential flats proposed would overlook this pleasant recreation area and impose on the feeling of privacy and cause security worries for the users, many of whom are children.
6. The proposal does not provide enough affordable housing for the community. The flats will no doubt be sold to invisible 'overseas' buyers and let out at astronomical rents for profit contributing little to the community in return.
7. The scheme provides no parking spaces and outside restricted cpz hours the nearby streets will be overwhelmed by users of the proposed retail facilities and the new residents and their visitors.

To sum up, we are extremely displeased and concerned about this ill-thought through and grossly large proposed development.

Yours sincerely,

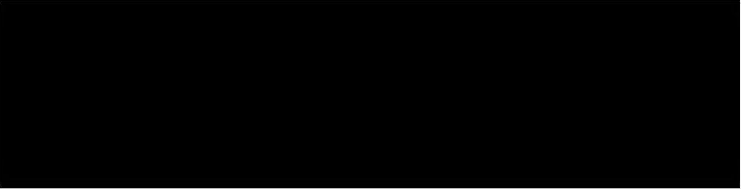
**Yusuf Ismail**

Chartered Architect

&

**Ingrid Ismail**  
Designer

50 ETON AVENUE  
LONDON NW3 3HN



Re proposed re-development at 100 Avenue Road, Swiss Cottage.  
We wish to object in the strongest terms possible to this proposed  
development which would be a HUGE potential Eyesore, totally out of  
keeping with the existing area and Skyline.  
We feel it is just unthinkable!

Sincerely  
Helen Bloom and Jeffrey Myers  
37c, Maresfield Gardens  
NW3 5SG



Dear Sirs

I have recently learned of the plans for a 24-storey replacement for 100 Avenue Road.

The tower block would be completely out of scale when compared with the surrounding buildings, including the Swiss Cottage Leisure Centre, the Visage, Taplow and the various other blocks of flats nearby. The impact on this whole area would be horrific. It would loom over streets such as Winchester Road and Eton Avenue and deprive neighbours of light and privacy.

It would also take light from and cast into shade the attractive and very well-used open space between Hampstead Theatre and the Leisure Centre.

Such tall buildings in a largely-residential area are an anathema. It seems that architects and construction companies believe that they have the whip hand and will be allowed to build whatever terrible towers take their fancy. Such buildings are anti-social. Has nobody learned anything from the disaster that was the 1960s tower block building boom? Tower blocks are not family- or user-friendly. And if you thinking of allowing this tower to be built on a "Buy-to-Leave" basis and allow it to be marketed first in the Far East, forget it, you'll have a riot on your hands.

In addition, the local schools, doctors' practices and hospitals are at full stretch.

The projected two-year build plan would bring disruption to a main access road into London (witness the traffic chaos brought about by the death yesterday of a motorcyclist) and, no doubt, impact heavily on journeys to work of the local population.

Please note my OBJECTION and put a stop to these plans.

Elizabeth A Fenner  
35 Fairfax Place NW6 4EJ



Dear Sirs,

As a resident of Netherhall Gardens for 51 years I feel I have to write to object most strongly to the Swiss Cottage planning application referred to above. I am a member of the Netherhall Neighbourhood Association and fully endorse the remarks made by our architectural expert Stephen Williams and simply want to add that this is an awful design, far too big and bulky for the area and will be an eyesore for the future. At present, it is a pleasure to visit the library and the leisure centre, especially in the summer when children play and enjoy the outdoor activities, but this looming pile will spoil it all and will affect all our lives in this neighbourhood and beyond. Please use your undoubted powers to turn this whole application down. Thank you. Yours sincerely, Patricia Whitehouse