

63, Netherhall Gardens, London NW3 5RE 0207 794 7493

Mr. Jonathan McClue,  
Camden Planning Department

Dear Sir,

**100 AVENUE ROAD, SWISS COTTAGE, NW3 3HF APPLICATION**  
**REF: 2017/4036/P S96A NON-MATERIAL AMENDMENT APPLICATION**

I wish to object to the above "Amendment Application".

It appears to demonstrate changes which are VERY MATERIAL and demonstrate a total disregard for safety for residents, especially Fire Safety, and the previous plans and permissions.

It seems to contain a large number of important alterations, none benefitting future residents?

1. I believe they propose to reduce the number of exits to three (from the original seven)

2. Communal Hallways to be reduced.

These are to improve the ground floor commercial units??

(I wonder if these changes are to improve profits?)

Surely, residents safety is more important?

3. Has the London Fire Brigade been consulted?

4.. If I understand correctly, there is only ONE stairwell?

(Has nothing about Fire Safety been learnt from the tragic results at Grenfell Tower, which had only one staircase?)

*(I own flats in Manchester. In a ten storey building, with eight flats per floor, there are THREE staircases.*

*Before being sold, this block was owned by Salford Council, built in the 1960's.)*

This letter is to request the application, REF: 2017/4036/P be refused, please.

Yours Faithfully,

S. Jalving



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**From:** karin fernald [REDACTED]  
**Sent:** 15 August 2017 10:20  
**To:** McClue, Jonathan; Planning  
**Subject:** 100 AVENUE ROAD, NW 3 3HF APPLICATION no: 2017/4036/P

From Karin Fernald, 2 Daleham Mews, NW 5DB

15.08.2017

100 AVENUE ROAD, SWISS COTTAGE NW3 3HF APPLICATION NO: 2017/406/P NON-MATERIAL AMENDMENT

Dear Jonathan McClue,

I wish to object most strongly to the above greedy and ill thought-out amendment, on several grounds:

- 1) Its so-called "*non-material*" nature. What can be more material than to remove 4 out of 7 doorways? Does Essential Living think your Department cannot read?
- 2) In addition to removing 4 doorways, the proposal is to diminish "*excess and oversized*" hallway space in order to increase apartment size. In a tower of 24 storeys with only one stairwell, how can almost any hallway be oversized?
- 3) They actually want to replace one exit with a water feature!

This amendment puts commercial interests far ahead of residents' safety. Dear Camden, please consider further.

Sincerely,

Karin Fernald



THOMAS MUIRHEAD ARCHITECT  
4E ROWLEY WAY, LONDON NW80SF

Jonathan McClue  
Development Management  
London Borough of Camden  
2nd Floor, 5 Pancras Square  
London N1C 4AG

Tuesday, August 15, 2017

Dear Mr. McClue

**Reference: amended application 100 AVENUE ROAD, NW3 3HF APPLICATION no 2017/4036/P**

I am objecting to this application on the grounds of **fire safety** with a request that a decision be deferred until spring 2018 or later, for the reasons set out below.

Referring to the amended floor plans and to three of the items summarised in the covering letter to the amended application:

- **Relocation of ground floor entrance openings;**
- **Internal layout changes to floor plans including the basement;**
- **Amendment to the basement levels,**

in my opinion these plans embody a number of fire risks. Following the Grenfell Tower fire, and in addition to the issues raised by flammable cladding, some of the submissions to the Enquiry have drawn attention to other risks associated with:

- The reliance on the "stay put" principle;
- The provision of only one means of escape.

In my opinion Grenfell has shown (as the Lakanal House tragedy had already shown in 2009), any building with a single means of escape and that relies on the "stay put" principle, particularly a residential tower, is inherently dangerous in the event of a fire.

In the amended application for 100 Avenue Road, the only means of escape from each part of the proposed project (in the tower and the low-rise block) is a single stair 1100 mm wide, configured as at Grenfell, i.e. with no natural light and the no possibility of venting smoke other than at the roof.

Moreover, the amended drawings appear to show all the access doors to the stairs, at all levels, opening the wrong way, i.e. towards anyone trying to escape.

I have a particular comment on the 6-level "community use" shown in the amended application. This appears to be served by a single stair that has no direct exit at ground level. Thus in the event of a fire at any level of the "community use", there would appear to be no safe escape route to the outside.

Whilst these amended plans may comply with current Fire Regulations, Grenfell has called those same Regulations, and the design of Grenfell Tower, into question. These and other matters are now under scrutiny by two on-going statutory enquiries:

1. The Grenfell Enquiry. The [interim report of the Grenfell Enquiry](#) is expected within a year.
2. The [independent review of building regulations and fire safety](#), which is expected to initially report before the end of 2017, with a final report no later than spring 2018.

In my opinion LB Camden should suspend judgment on this amended application because **the plans embody major fire risks**, and because any approval may pre-empt the recommendations of these two statutory inquiries, as well as the outcomes of any other legal action as may take place.

Yours faithfully,

Thomas Muirhead

[REDACTED]

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**From:** David Reed [REDACTED]  
**Sent:** 15 August 2017 11:39  
**To:** McClue, Jonathan  
**Cc:** Planning  
**Subject:** 100 AVENUE ROAD, NW3 3HF APPLICATION no: 2017/4036/P

**Importance:** High

Re: 100 AVENUE ROAD, SWISS COTTAGE, NW3 3HF APPLICATION REF: 2017/4036/P ?S96A  
NON-MATERIAL AMENDMENT APPLICATION

**The Save Swiss Cottage Action Group, representing thousands of local residents, wishes to object to this application. The details constitute material amendments to the existing planning permission and should be rejected.**

The developers propose removing FOUR out of SEVEN exits from their new building, leaving only three out of the originally planned seven exits.

In addition they propose to reduce hallway space to increase residential and commercial space. This will not "improve the environment" as the developers claim, it only aims to improve profits at the expense of safety.

**These amendments compromise fire safety and there appears to have been NO CONTACT with the London Fire Brigade asking for their opinion on this VITAL FIRE-SAFETY MATTER. The Planning Committee MUST request an expert report on these arrangements from the London Fire Brigade.**

My objection is based on the following factors:

**1) Fire safety for future residents**

The 'Removal of a secondary residents access and removal of entrance door' along the eastern side of the side building poses a DANGER TO SAFETY as it reduces exit options. This change is only being made to increase the amount of commercial and retail space.

There are now NO EXITS along the whole length of the eastern side of the 7/5-storey building. The proposal only leaves one exit at Avenue Road, instead of the originally planned two, and MUST compromise the safety of the building's residents.

**Without assurances from London Fire brigade that this is safe, the planning committee should reject this application. The removal of this exit constitutes a material amendment.**

b) The proposed removal of doors to the North West corner of the 24-storey tower's lobby facing Avenue Road is unacceptable because, once again, it raises issues of FIRE SAFETY: it will reduce escape options for the tower – for the sake of a water feature – and this, as we have seen with the awful Grenfell Tower fire, will create a major issue for the safety of the 200 or more people living in this tower.

According to the new drawings (but not mentioned in the Cover Letter) two further exits have also been entirely removed, along the southern side of the tower. This means that now there would only be one exit for the 24-storey tower, instead of the four that were originally granted in the planning permission. This is a material change which will sacrifice safety.

The developers propose to remove four out of seven exits from their new building, leaving only three out of the originally planned seven exits.

## **2) Reduction in internal public space**

The developers propose reducing hallway size which will further increase the problems of an evacuation, solely in order to enlarge unit sizes and maximise profits. This will inevitably compromise fire safety, particularly within a 24-storey tower designed with only one stairwell. This is a material change.

## **3) Other changes**

a) 'Changes to the 'means of opening windows' and the 'positioning of the balconies'  
Without assurances from London Fire Brigade on the new window opening arrangements and their impact on fire safety, this is a material change.

b) 'Removal of the rooftop maintenance unit in the tower due to 'changes in window cleaning strategy'  
This is a significant amendment to the granted permission because it is stated that the glazing on the tower would be kept well maintained. No information has been offered as to how the windows will be kept clean without this rooftop maintenance unit. This is a material change.

c) A new stairwell is proposed that will come up from the basement where the PRS Bike Store (144 Bicycles) was originally planned.

Apart from there being no reference to this change in the Cover Letter, it is a mystery as to what this stairwell will serve as it will surface at the pathway near the Green Space.

This will create new disturbances in the Green Space, the only local area where children and local people can relax, so the impact on the Green Space will be substantially worse than in the original planning application.

Given that the Inspector reached an 'on balance decision' on the basis of the material presented, these new changes constitute a material change.

**Please reject these changes until you have firm evidence and INDEPENDENT EXPERT reports addressing all of the above problems. We also demand that you take all steps needed to preserve the peace and tranquillity of the open space, the only area where children can play and adults relax in the whole of Swiss Cottage.**

These awful buildings will largely destroy the amenity of the whole of the area and a decent Planning Authority would have taken more steps to protect us from this lousy development.

With respect,

**David Reed**  
**Treasurer, Save Swiss Cottage Action Group**

**David Reed, Flat 2, 56 Eton Avenue, London NW3 3HN, UK**



[REDACTED]

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**From:** CHRIS ESMOND [REDACTED]  
**Sent:** 15 August 2017 14:43  
**To:** McClue, Jonathan  
**Cc:** Planning  
**Subject:** Re: 100 Avenue Road, NW3 3HF Application No: 2017/4036/P

I wish to object to the following application: **100 AVENUE ROAD, SWISS COTTAGE, NW3 3HF APPLICATION no: [2017/4036/P](#) NON-MATERIAL AMENDMENT**

The points below clearly constitute material amendments to the existing planning permission, therefore this application should be rejected.

The reasons given for these amendments are to "deliver an improved environment for future occupiers of both the residential and commercial uses...The changes to the internal layouts improve the quality and configuration of the apartments, utilising excess and oversized hallways to improve the unit sizes."

Removing four out of seven doorways, leaving **only three out of the originally planned seven exits**, and reducing hallway space to increase residential and commercial space will not "improve the environment".

These are significant, material changes that will only serve to maximise profits and minimise safety and are consequently unacceptable.

#### **Reduction in number of external doors**

i) "Removal of doors / access to the chamfered North West corner of the PRS lobby and hard landscaped area replaced with soft landscaping / water feature".  
i.e. one of the two main entrances of the tower facing Avenue Road.

- ∞ This is unacceptable because it will reduce escape options for the tower (for the sake of a water feature). This is a material change.
- ∞ Furthermore, according to the new drawings and not mentioned in the Cover Letter, two further exits have also been entirely removed, at the south aspect of the tower. This means that there would **now only be ONE exit for the 24 storey tower**, instead of the three that were originally granted in the planning permission. This is a material change.

ii) "Removal of a secondary residents access and removal of entrance door".  
i.e. 'the affordable entrance' at the eastern side of the horizontal, 'affordable' building.

- ∞ This reduces exit options and therefore fire safety for the affordable residences. The reason given for this amendment is because of "regard to the need to separate servicing and general pedestrian access and to improve the attractiveness of the ground floor commercial units".

- ∞ Yet this servicing/plant area is only just now being introduced in this application. It will take the place of a much needed residential entrance hall that connects the east and west entrances, as shown in the original plans. There is no mention of this significant, material change in the Cover Letter. And it is also not acknowledged that this change will increase the commercial/retail space.
- ∞ The proposal only leaves one exit at Avenue Road, instead of the originally planned two for the affordable building. The loss of this important exit will surely compromise fire safety.
- ∞ The other remaining third exit, for the whole development, is for the entirely separate DMR/intermediate section of the same building.
- ∞ Prioritising commercial interests over people's safety is unacceptable. The removal of this exit constitutes a material amendment.

### **Reduction in internal public space**

iii) "Changes to the internal layouts to improve the quality and configuration of the apartments (by) utilising excess and oversized hallways to improve the unit sizes". i.e. simply stated, a reduction of hallway size in order to enlarge unit sizes and maximise profits.

- ∞ This will have the effect of compromising fire safety, particularly within a 24 storey tower designed with only one stairwell. Reducing the hall space still further increases the problems of an evacuation. This is a material change.
- ∞ Prioritising commercial interests over people's safety is unacceptable.

### **Other Changes**

iv) A new stairwell is proposed that will come up from the basement where the PRS Bike Store (144 Bicycles) was originally planned.

- ∞ Apart from there being no reference to this change in the Cover Letter, it is a mystery as to what this stairwell will serve as it will surface at the pathway near the green space. This is a material change that needs explaining.

### **Questions**

- ∞ Why are the revised drawings not dated? They need to be resubmitted with dates.
- ∞ In the light of the Grenfell tower fire, can the applicants confirm that any fire safety issues now arising have been catered for?

This application proposes 'non-material' changes. Yet it is evident that these amendments are 'material', therefore this application must be rejected.

Yours sincerely,

Chris Esmond



[REDACTED]

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**From:** ruth tenne [REDACTED]  
**Sent:** 15 August 2017 17:04  
**To:** McClue, Jonathan  
**Cc:** Planning  
**Subject:** 100 Avenue Road NW3 . Application 2017/4036/P

Dear Jonathan McClue,

My main objection to the revised application by Essential living is on the grounds that it intends to reduce the internal public space, claiming the it could improve the quality and configuration of the apartment by utilising excess and oversized hallway to improve unit sizes .

This, in my view, would compromise fire safety regulations , especially in a tall tower block (24 stories) which has only one stairwell . Obviously , this is a material change which would cause further difficulty in situation requiring residents' evacuation . This proposed change is obviously aiming to maximise the the developers' profit .

I wonder also how many of the planed luxury flats would be allocated to socially - deserve residents/tenants.

I hope it would be for, at least, 20% of the occupants - as social housing regulations require.

Yours sincerely

Ruth Tenne

68 Goldhurst Terrace London NW6 3HT

[Redacted]

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**From:** Patrick Meier [Redacted]  
**Sent:** 15 August 2017 17:09  
**To:** McClue, Jonathan  
**Cc:** Planning  
**Subject:** 100 Avenue Road, NW3 3HF Application No. 2017/4036/P

I write to object to the latest changes referred to in the above application.

Reducing the number of exits must increase fire risk and so soon after the Grenfell disaster is surely unthinkable. These proposals must represent material change and this application should therefore be rejected.

Yours sincerely

**Patrick Meier**  
139 King Henry's Road  
London NW3 3RD

[Redacted]

[REDACTED]

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**From:** Norma Papp [REDACTED]  
**Sent:** 15 August 2017 19:04  
**To:** [REDACTED]  
**Cc:** Planning  
**Subject:** App. ref 2017/4036/p

Sir,  
I strongly object to this application.

Many details have changed since the original plans were submitted and the reduction in the number of exits beggars belief in view of the recent events at Grenfel Tower.

Please do not put the lives of Camden residents in danger simply to mollify Essential Living's greed and Camden's supine "giving in" to these developers.

Yours truly,

Norma Papp.

26, Aberdare Gardens, NE63QA.