



Our Ref: RE/HG3405

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21 August 2017

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

FAO: Jonathan McClue

Dear Sir

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

We write further to the above on behalf of our client, Essential Living (Swiss Cottage) Ltd.

A number of neighbour objections have been raised regarding the proposal, received by the Council. The below comments are provided in response to those appearing on the Council's website at the above date in order to clarify the proposals and justify the application as submitted.

Reduction in hallway width/space, particularly in the 24-storey North Block which has one stairwell relating to an emergency evacuation, changes to internal staircase arrangements and consultation with London Fire Brigade

The issues of emergency evacuation and fire safety are significant and have been taken into account throughout the inception of the approved plans. Accordingly both buildings have been designed to comply with the requisite Building Regulations, Part B and the London Housing Design Guide. Whereas this is a matter governed beyond the planning system and it is Government advice that where that is the case the planning system should not seek to overlap the primary regulations it is understandable further assurances on the matter are required to be provided. It is important that compliance with the Building Regulations is incorporated within the scheme at planning stage and when complete the development will have to obtain the requisite Building Notice for it to be occupied.

Essential Living have employed an expert fire safety consultant and an Approved Inspector who have been engaged in the design and review of the buildings. Corridor, staircases and door widths exceed minimum Building Regulation requirements as means of escape for occupiers and for fire fighters access. Numerous fire safety features are incorporated within the design in terms of its layout and form to prevent the spread of fire; provision of protected corridors and stairs; comprehensive fire alarm system; enhanced automatic smoke control used to ventilate corridors and protect the stair in case of fire; life safety water mist suppression system in compliance with Part B requirements

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supported with a sixty minute internal water supply; back up pump; emergency lighting in all escape routes; and secondary life safety power supply. An objection refers to the relocation of a basement staircase surfacing within the pathway/landscape area above. This appears to relate to the basement plant stairs however it does not surface as per the objectors letter but rather leads from the low point of the basement plantroom to the higher level of the car park area only. This is as part of the internal basement layout plan changes noted in the NMA application. In conjunction with the fire safety design features the provision of single stairs within the North Block are in accordance with Building Regulations Part B and the London Housing Design Guide. Whilst the matter is dealt with through the Building Regulations it is noted LB Camden are consulting with London Fire Brigade as part of the planning application procedure.

The changes to fire exits, window openings and location of balconies affect fire safety

The residential fire escape route within the Tower remains in line with the approved planning design and the proposed changes incorporate the net removal of only one door, that being a back of house door. An updated ground floor plan to show more clearly the two door openings to the north and south elevation of the Tower is provided which accord with the respective elevation drawings previously submitted showing the revised entrance doors.

The means of escape in the event of an emergency within the Tower is via the base of the fire escape stairs, through an exit to the south of the Tower and into the space between the two buildings. Escape through the entrance lobby as described in the objection is not relied upon for upper levels as there will be fire load in these spaces and it would not be the most direct route out of the building. In addition, it is noted that the new access point is proposed at ground level within the Tower on the north façade in place of the north-west corner access. Provision of all doors comply with Building Regulation requirements for means of escape.

Proposed changes to window openings have altered the external visual appearance of the window frame, necessitating submission of this application. Location of window openings are only amended slightly and still serve the residential units in the same manner. Details of opening types were not specified or controlled within the original application and not detailed now other than their design.

Balcony locations are in line with the planning approved designs. In a small number of locations, it is the division of the balcony which has changed to align with apartment changes behind but otherwise no changes have occurred.

Nature of openings within the Tower will affect light reflection and glare

Glazing locations now proposed are almost entirely as per the planning approval and accordingly any change would be minimal. The nature of the openings was not a matter previously identified or provided for now.

Loss of Building Maintenance Unit will mean the building won't be kept clean

The provision of a Building Maintenance Unit (BMU) to the roof is a matter of visual impact of the structure not of the planning requirement to clean the building windows. The provision of a window cleaning strategy is not controlled by the planning permission nor is it required by a planning condition. The future cleanliness of the building it is not a material planning consideration and should there not have been a BMU within the original planning permission the matter would not have generated any concern. The removal of the BMU will be of visual benefit of the surrounding area. For



information purposes, however, it is the intention of the applicant to provide a man-safe wire fall arrest system on the roof which will not be visible. This will allow professional abseil window cleaning to occur and for the regular maintenance of the building which is standard practice and produces a safer method of cleaning. It is in the applicant's interest to ensure the building is well maintained. Such matters fall within the consideration of health and safety regulations rather than the planning system.

Change in materials used less safe

The visual suitability of external materials used within the construction of the building are controlled by Condition 18. Details of external materials were included for information purposes and taken into wider consideration as part of the visual assessment of the original application. The materials referred to now are similarly only provided for information purposes.

Building Regulations control the suitability of the external materials as they do for the rest of the building's construction in terms of their structural integrity and the applicant must obtain the requisite approval separately to the planning permission. By their very nature the external materials indicated on the current application are non-combustible, comprising GRC, brick-slips, solid aluminium panels, glass panels, granite and framed glazing.

Formation of 'poor doors' stigmatising for users

The removal of the second entrance to the east elevation of the lower block was dedicated purely to the Rented Affordable units and retention of the primary entrance onto Avenue Road, also dedicated entirely to affordable units, does not in any way change the accessing arrangements to residents by tenure type as previously approved.

The affordable apartments have always had a separate entrance due to being located in a separate building from the Market PRS apartments which are all within the North Block. This is as per the planning approved design.

The 26 no. Discount Market Rent/Intermediate units in the Lower Block remain served wholly by a single entrance on the North façade. There is no change proposed now to the approved access arrangements for those units.

The 28 no. Rented Affordable units in the Lower Block remain served by a primary entrance from Avenue Road. The secondary entrance serving only those units is proposed for removal. Accordingly no change to the residential access arrangements for the Rented Affordable units are proposed other than removal of the east access.

Separation of servicing arrangements

Servicing arrangements are being worked up by the consultant team and in response to the re-arranged basement layout, re-aligned to improve the location of plant, servicing and communal waste storage. The overall waste strategy is not affected by the proposals.

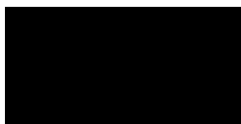
Section/Elevations not aligning

Section/Elevation reference lines follow the principle of the approved planning permission and are shown indicatively only on the key plans to sections and elevations which appear at a much smaller scale than the larger drawings. Section 6 cuts through the Tower stair as before.



I trust the above satisfactorily addresses all concerns raised to neighbour objections and LB Camden will be able to approve the application accordingly.

Yours faithfully



RICHARD EVANS
Associate Director
WYG