

Ian R. M. Barden

Genesis Architects Ltd. 7 St Margarets Road Stanstead Abbotts Ware Hertfordshire SG12 8EP

16 September 2024

Dear Sir

Karridale Mansions : fire and safety issues : Camden 2024/0182/P

I recently came across your planning application submission for Karridale Mansions at 72 Tottenham Court Rd W1T 2HE, planning submission number 2024/0182/P on Camden's Planning Portal¹.

As a resident of Karridale Mansions I am concerned, admittedly as a non-professional, by several aspects of your design relating to fire and other safety issues in and around the building which I wish to bring to your urgent attention in your role as the coordinating professional subject to the required competencies of the professional bodies of the ARB and RIBA, particularly in relation to fire safety design.

Firstly, for context, I agree that the windows in the building need attention. At present several of our windows have severely distorted frames, as shown below, and one of the windows has been boarded up for 12 months. The landlord's maintenance (which was aborted) leaves a lot to be desired.



Flat 10 distorted frames April 2021; "maintenance work" 18 September 2023; window status since 19 September 2023

¹ <u>https://camdocs.camden.gov.uk/HPRMWebDrawer/PlanRec?q=recContainer:%222024/0182/P%22</u>

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However we are concerned about your design for the windows and object to your proposals for several direct and ancillary reasons as noted below.

My concerns about fire and other safety issues include:

- There is presently a disagreement between the freeholder TfL and the landlord about having a
 pressurised main stair or otherwise to have a secondary means of escape via the external fire
 escape. I have been told by TfL that the external stair is unsafe to use. I understand that
 Camden's environmental health department favour a pressurised solution and I enclose a
 publicly available letter from TfL on the subject. However, your design for windows off the
 internal stair to the external escape does not appear to be appropriate for either fire strategy,
 or indeed the present situation.
- The dormers onto Tottenham Court Road (adjoining the casement windows on the east elevation shown in your drawings) have not to my knowledge had their insulation assessed for fire safety and are otherwise causing mould buildup on the interior, the subject of a Camden Environmental Health hazard notice dated 13 March 2023. In addition to not covering the dormers in your drawings, I also note that they fail to show that all the casements in our flat are presently openable.
- Several flats in the building have been renovated in recent years with extensive works done to kitchens. I note that several of these, such as Flat 9, do not have external kitchen extractor fans. (Our own flat requires an extractor according to the hazard notice noted above). In the case of Flat 9 the removal of the extractor followed the replacement of the casement windows in 2014, necessitated by rotting windows falling into Tottenham Court Rd. I could not find extractors or boiler flues marked on your drawings which I believe would be required wherever they are missing or presently fitted through windows.
- The flat roof structure to the building and our flat is, according to a report from 2001 by structural engineer Mike Hadi, prone to cracks parallel and perpendicular to the filler joists. The roof is to my knowledge without insulation other than the Gyproc Thermaline we installed to the soffit in 2006 (an installation checked by the landlord's surveyor Martin Harris). It is my understanding that the fire safety and structural integrity of the roof has not been recently assessed.
- There is a known problem with an infestation of mice in the building, travelling between floors within the structure, possibly in the network of chimney flues that remain unsealed. We are concerned that these passages may allow smoke and fire to rapidly travel between floors in the event of fire.
- Many of the flats appear to be occupied by students potentially requiring those flats to meet the fire requirements for HMOs (multiple occupancy).
- The flat front doors have recently been converted by informal, non-specialist builders. The fire integrity of these doors have, I believe, been called into question by Daniel Wilmer of Delco Safety whose company conducted an inspection of our flat front door in June of this year. I ask you to inspect Delco's report, although this was not a full Fire Risk Assessment inspection.
- The extensive list of recommendations for improvements to fire safety set out by All Building Control in their report of 1 June 2023 have not been satisfactorily addressed.

- You should be aware that the last Fire Risk Assessment (FRA) by the landlord is, to our knowledge, the FRA prepared by Chubb dated 30 October 2022 which preceded several changes to the building made by the landlord.
- The freeholder has been forced to install scaffolding on the building to protect pedestrians and users of Goodge St Tube Station from masonry falling from the front elevation of the building. Your drawings do not seem to address the serious disrepair with the front elevation of the building which is causing this problem, which reasonably would be expected to be repaired at the same time as fitting windows.

In clarification to the point made on your drawings, the windows from the flats leading to the external fire escape were replaced in 2023. Ours were installed in June 2023. I believe these windows were replaced without planning or building control permission.

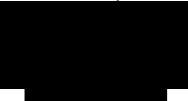
I also note that in contradiction to the claim made in your Design & Access Statement of the windows receiving "continual high maintenance" that we have had no maintenance of our windows since their installation 10 years ago, following the disastrous incident noted above, save for some aborted works in September 2023. As not even uPVC windows are maintenance-free, it would be helpful if you set out a maintenance schedule in your proposals.

I am further concerned that your design suggests that you have not visited the building, since there are several inaccuracies in the plans and elevations and your photographs seem to come from other sources. Our flat has no bay windows, for example, and a quite different bathroom and main room layout. I would be happy to arrange for you to visit our flat so that you can inspect it during a site visit, and we can discuss the items I have noted above in more detail.

Most importantly, It seems reasonable to ask that your designs are made in conjunction with a comprehensive and up-to-date fire and safety design, incorporating all the aspects I have mentioned in this letter.

I believe these concerns and issues set out in this letter are pertinent not only to the safety of residents of the building but also to users of Goodge Street Tube Station and passersby. I consequently request that these matters meet your urgent and thorough attention. And while you make no mention of the current qualities of the building and fenestration in your Design & Access Statement, I hope that it may be possible to preserve and enhance some of these given more thought and care.

Yours sincerely,



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Iain Clark, Principal Environmental Health Officer, Camden Council Geri Gohin, Planning Officer, Camden Council Philip Aish, Senior Surveyor, Transport for London

enclosures: Letter from TfL 7 November 2023

