

84 Foundling Court
The Brunswick
London WC1N 1AN

6th June 2017

John Diver,
Development Management,
Camden Town Hall,
Judd Street,
London,
WC1H 9JE.

Dear Mr Diver,

Application: 2017/2550/L

Address: Leon Restaurant, Unit 2, The Brunswick Centre

On behalf of the Brunswick Centre Tenants and Residents' Association, I wish to object to the application by Leon Restaurants for retrospective Listed Building Consent for the installation (not simply replacement, as the application states) of plant at The Brunswick Centre.

The existing air extract plant is overloaded and, as it has not been properly maintained since the building was refurbished generally more than ten years ago, has caused staining and damage to the fabric of the Listed Building on the flank walls to Bernard Street and at high level, at the top of the vent towers. The installation of extra plant, in association with the unauthorised change of use from A1 retail use to A3 café/restaurant/snack bar use, will increase the noise and the fumes, and is likely to lead to further staining and damage to the fabric. The application should be refused on this basis, if no other.

Alternatively, the application should be rejected on the basis of the inadequacy of the information submitted.

1. The following false statements appear in the application form:
 - a. At Section 3: the applicant describes the proposal as "Replacement of plant equipment". This is misleading: the plant is not being replaced like for like; low power air handling units serving the previous shop have been removed and higher power units to serve the unauthorised restaurant have been installed. The unit on the left hand side of the before and after photographs is not of the same type in both bases, and at least one smaller unit has been added, to the right hand side. This is not "replacement" in any natural sense of the word.

- b. At section 5: the applicant says that there are no related applications for the property. As you are also the officer dealing with the application for retention of this unauthorised change of use, you are aware that this is a false statement.
 - c. At sections 10/11: the applicant states that the works involve neither demolition nor stripping out of internal wall, ceiling or floor finishes. The works have involved the demolition of the shop fittings, staff facilities etc. previously in place, and the complete strip out of finishes; the plant could not have been installed without this strip out.
2. The Application Details provided on Camden's website state that both the existing use and the proposed use are both "A1 shop". This is incorrect: the property is not, and is not proposed to be, in A1 use. The unit is in A3 café/restaurant/snack bar use, unlawfully so, and is proposed to remain in that use. You, and the committee members, are presumably aware that there is a significant difference between retail air handling and restaurant air handling, with restaurant air handling creating much problems for occupants of neighbouring properties.
3. The drawings submitted are unsatisfactory, and do not allow proper consideration of the proposal, for the following reasons:
 - a. No drawing is provided showing the existing HVAC layout at basement level.
 - b. Much of drawing Q16-147-M01 "Proposed HVAC layout [of the basement]" is blank, and does not show in any substantive sense what is proposed, including plant positions, duct routing, sound attenuation etc.. However, what is clear is that the drawing indicates that all of the plant to be installed in the basement is manufactured by Toshiba, whereas that shown in the plant technical details and the photographs is manufactured by Daikin. In addition, what is visible of the layout does not accord with the photographs provided.
 - c. Drawing 140162-U2 fails to show any plant whatsoever at ground floor level, which is inconsistent with the claim that this application is simply to replace existing plant. It is clear that no attempt has been made to provide information on the previously existing situation; the application should not be considered without such information.
 - d. Drawing Q16-147-M01 "Proposed HVAC layout [at ground floor]" is inaccurate and incomplete. The marked up plan attached notes the points where the information provided is incomplete or is likely to mislead. In particular, the drawing gives no information on how air is supplied to the restaurant, and where the air extracted is discharged. Note also that this drawing again refers solely to Toshiba plant, when the applicant has provided information only on Daikin plant.
4. The applicant's claim in the Design and Access Statement, repeated in the Heritage Statement that "*The amount, layout and positioning of the plant is fully detailed within the accompanying application plans and documents*" is false, for the reasons given above. The proposal is entirely unclear, presumably intentionally so.
5. The applicant's description of the proposal, as set out at paragraph 5. of the Heritage Statement is entirely opaque: it gives no indication of the purpose to which plant is to be put; it says neither what plant was in place previously, nor why this plant is required to be replaced. However, it is safe to assume that the plant previously used to ventilate the shop unit was inadequate to ventilate the fast food restaurant: otherwise why

would the applicant go to the expense of replacing it. In addition, the applicant gives no information on what steps it will take to address the increased noise levels produced by this additional plant, nor how the problem of restaurant fumes, with the resulting fabric damage, will be mitigated.

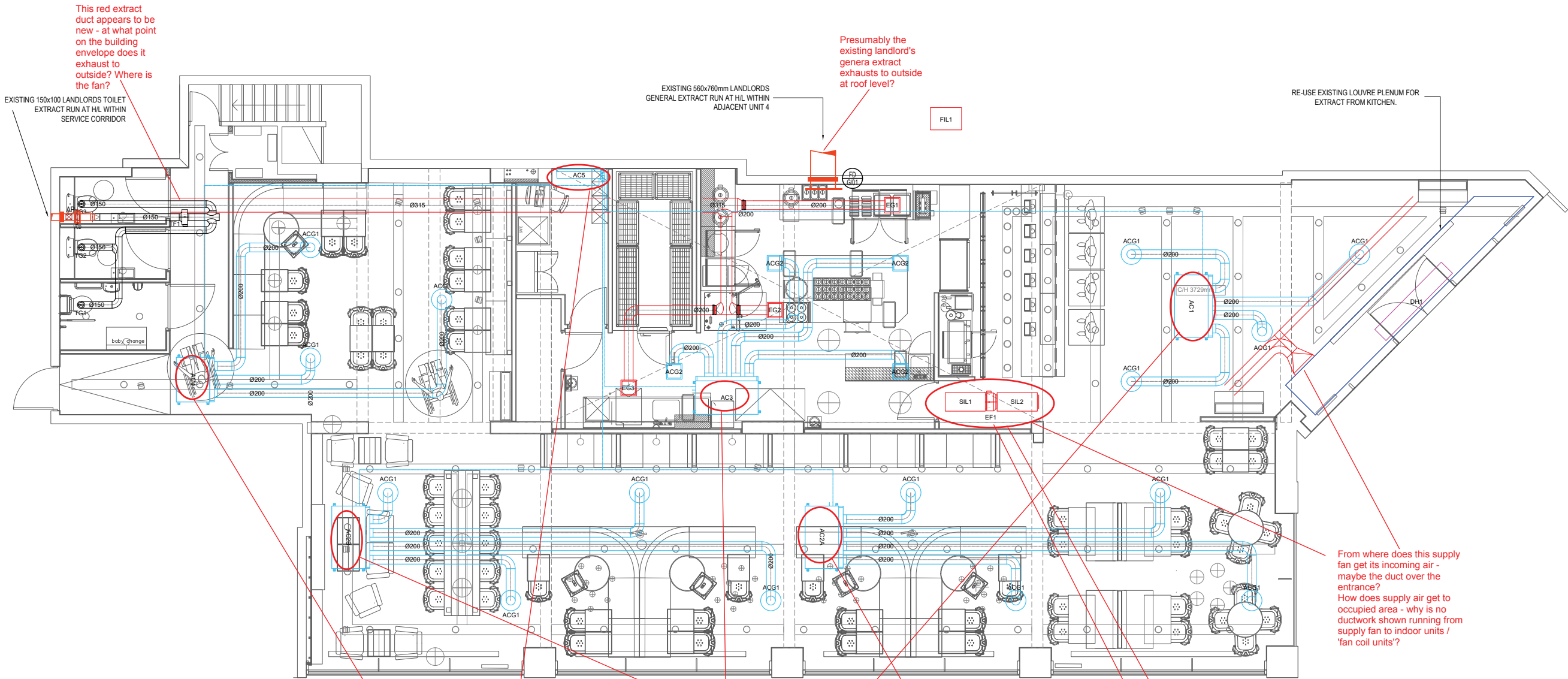
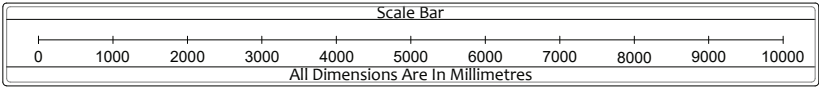
The documents submitted with this application are entirely inadequate for consideration of what appears likely to be a harmful series of alterations. On behalf of the residents of the Brunswick Centre, I request that you reject the application and advise the applicant that if it wishes any such application to be considered seriously, it should submit complete, correct and consistent information.

Yours sincerely,

Brendan Woods

Copy Ricci de Freitas, Marchmont Asociation

Enclosure



- NOTES
1. CONDENSER UNITS LOCATED IN UPPER BASEMENT
 2. AC SYSTEM BASED ON DX SPLIT TYPE.
 3. EXISTING DAIKIN AC SYSTEM TO BE REMOVED
 4. EXISTING AIR CURTAIN TO BE REUSED
 5. PIPEWORK ROUTE FOR AC TO BE CONFIRMED

E	E Note	E Date
D	D Note	D Date
C	C NOTE	C DATE
B	B NOTE	B DATE
A	A NOTE	A DATE

Revision Notes



synecore
ELECTRICAL REFRIGERATION MECHANICAL

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CLIENT AND PROJECT TITLE

Client
LEON RESTAURANTS LTD

Project
LEON, UNIT 2, THE BRUNSWICK CENTRE

DRAWING CONTENT
PROPOSED HVAC LAYOUT

DRAWN BY: CB DATE: 20-06-16
COMP REF: CB SCALE: 1:50

DRG NO: Q16-147-M01 REV: B

AS BUILT

AC4 -TOSHIBA RAV-SM806BTP-E DUCTED UNIT
DIMS: 1000WIDE X 750DEEP X 275HIGH
WEIGHT: 30KG
PIPE SIZE: 5/8-3/8

AC1 -TOSHIBA RAV-SM1106BTP-E DUCTED UNIT
DIMS: 1400WIDE X 750DEEP X 275HIGH
WEIGHT: 41KG
PIPE SIZE: 5/8-3/8

AC2A-AC2B -TOSHIBA RAV-SM1406BTP-E DUCTED UNIT
DIMS: 1400WIDE X 750DEEP X 275HIGH
WEIGHT: 41KG
PIPE SIZE: 5/8-3/8

AC5 -TOSHIBA RAV-566KRT-E WALL MOUNTED UNIT
DIMS: 1050WIDE X 228DEEP X 320HIGH
WEIGHT: 12KG
PIPE SIZE: 1/2-1/4

AC3 -TOSHIBA RAV-SM1406BTP-E DUCTED UNIT
DIMS: 1400WIDE X 750DEEP X 275HIGH
WEIGHT: 41KG
PIPE SIZE: 5/8-3/8

ACG1 - SDICH200 ADJUSTABLE SWIRL DIFFUSERS
DIMS: Ø457 OVERALL (NECK SIZE Ø203)
AIRFLOW: 145L/S
COLOUR: MILL FINISH
SUPPLIER: WATERLOO

ACG2 - 200DIA CIRCULAR WEATHER LOUVRES
DIMS: (NECK SIZE Ø203)
AIRFLOW: 145L/S
COLOUR: MILL FINISH
SUPPLIER: WATERLOO

DH1 - THERMOSCREEN C2000E AIR CURTAIN
DUTY: 18KW
DIMS: 2200WIDE X 275DEEP X 198HIGH
WEIGHT: 33KG
ELEC SUPPLY: 400V,3PH,50HZ,27.2AMP FLC

EG1-EG3 - EGG CRATE GRILLE
DIMS: 300X300
DUCT CONNECTION: Ø200
AIRFLOW: 100L/S
COLOUR: SAA

EF1 - SYSTEMAIR K315EC SUPPLY FAN
AIRFLOW: 350L/S @ 200PA
DIMS: Ø408WIDE X 225DEEP X Ø408HIGH
DUCT CONNECTION: Ø315
WEIGHT: 7.2KG
ELEC SUPPLY: 230V,1PH,50HZ,2.08AMP FLC

SIL1 & SIL2 - SYSTEMAIR LD315-900 ATTENUATOR
DIMS: Ø415WIDE X Ø415HIGH X 900LONG
DUCT CONNECTION: Ø315
AIRFLOW: 300L/S

TF1 - SYSTEMAIR K150XL
DIMS: Ø346WIDE X Ø346HIGH X 161DEEP
DUCT CONNECTION: Ø100
AIRFLOW: 45L/S
WEIGHT: 0.3KG
ELEC SUPPLY: VIA LIGHT CIRCUIT

TG1-TG3 - VB METAL EXTRACT AIR VALVE
DIMS: Ø180 OVERALL (NECK SIZE Ø150)
AIRFLOW: 15L/S
COLOUR: RAL9010 WHITE
SUPPLIER: WATERLOO