

18th February 2018

3 Leverton Street
Kentish Town
London
NW5 2PH

Camden Council Planning Department
Town Hall
London WC1H 8ND

Dear Sir or Madam,

Planning Application ref. 2017/6916/P - Assembly House, Kentish Town
Listed Building Application ref. 2018/0554/L - Assembly House, Kentish Town

I am writing to raise several objections to the submitted planning application and listed building consent application. This letter covers my objections to both applications. I live close to the Assembly House, and the proposed changes to the rear of the the establishment are of concern to me.

Firstly I would like to state that in principle, I support the use of the upper floors of the Assembly House for hotel guest accommodation. It would bring useful hotel accommodation into the area. My concerns are about how the proposals have been drawn up, which I believe to be ill-considered, detrimental to both the Grade 2 listed Assembly House building itself and to the conservation area within which it sits. I also believe they are non-compliant with Fire Regulations.

The following are my objections:

Firstly, the application form contains inaccurate information - the applicant states that no demolition is to be undertaken, where the drawings show significant internal demolitions as well as some external demolitions. Also there is no information on change of use class. The existing A4 use class - drinking establishments - does not cover guest or residential sleeping accommodation (use class C1).

My main concerns relate to the proposed new additions to the rear of the Grade 2 listed Assembly House building:

- 1) The external additions described in these proposals are to a Grade 2 listed building set within a conservation area. The use of an open steel staircase and new liftshaft clad in 'rendered panels' are out of context in the conservation area, and are inappropriate additions to a listed building. Insufficient information is provided on the proposed new lift shaft enclosure for the purposes of a Listed Building Consent. What colour or finish is the render? The proposed section drawing does not show any lift shaft overrun above top floor level, which is generally required for commercial lift shafts. So the heights shown on the drawings will not be achievable - the shaft will need to be around 1 to 1.4 metres taller than shown, even for a hydraulic lift. As no levels are given on the application drawings, how will the council hold the applicant to account once construction starts? This addition will be highly visible from neighbouring properties in the conservation area, and it should be a well considered piece of design. The information provided in the application is insufficient and apparently inaccurate in certain respects, and hence does not allow proper consideration of the proposals.
- 2) The proposed external steel fire escape stairs require people to return back into the building at first floor level in order to finally escape the building via an internal accommodation stair. This is against the guidance of Building Regulations Approved Document B, Volume 2, Part B1 (see Page 56, Diagram 25). Which stipulates that such a route should be served by an 'independent stairway' from a roof podium situation such as this. The current proposed route has accommodation opening directly off the escape route within the building at first floor level - the meeting room - a fire within which could block escape via the main stair as well as via the escape route. No fire strategy or specialist fire consultant report has been submitted with the planning application to address this conflict with current guidance. **After Grenfell, are Camden Council prepared to ignore Building Regulation Fire Guidance?**

- 3) The proposed lift only serves the first to third floors. So it does not make the guest accommodation accessible to the disabled (or frail elderly). This runs contrary to the requirements of the Equalities Act 2010, which provides that services should be accessible to disabled users where such new facilities are being created and where accessibility could reasonably be accommodated - unless the advice of the local authority's conservation and access officers has been sought (Approved Document M, Volume 2, Section 0.17 -0.18, General Guidance). There is no record in the application documents that this particular advice has been sought. Has the council's access officer agreed that disabled access to the new guest accommodation is not required? Not taking the proposed lift down to ground level seems extraordinary in these circumstances. Why then is a new lift proposed at all? The application runs contrary to the spirit of current accessibility legislation, and is incompatible with the guidance of Approved Document M of the Building Regulations.

Finally, potential noise nuisance to neighbours.

- 4) The proposals involve locating new air-conditioning units on the flat roof at the back of the property at first floor level. Unlike the existing units, which serve the pub, the new units will serve the bedroom accommodation and hence probably run all night. They are located adjacent to bedroom windows of neighbouring residential accommodation. However the noise report included in the application does not contain any assessment of noise at the back of the property, where the units are to be located, and where potential noise nuisance will be of most concern. Why does the application completely ignore the property's immediate neighbours? We request that the applicant submit a noise assessment for the rear of the property in respect of neighbouring bedroom windows which will be most affected by the proposals.

So, to summarise:

- a) The information in the application is incorrect in a number of respects.
- b) The design proposals are ill-considered and detrimental to both the Grade 2 listed building of the Assembly House and also to the context and setting of the surrounding conservation area.
- c) The new fire escape proposals do not comply with Building Regulations Fire Guidance.**
- d) The proposals do not meet the requirements of Part M of the Building Regulations, or relevant sections of the Equalities Act 2010.
- e) The proposals do not demonstrate that no noise nuisance for the immediate neighbours will be created by the new air handling units located adjacent to their rear bedroom windows and that will probably run through the night.

I hope and trust these concerns will be considered as part of the council's evaluation of the submitted application. Most importantly, I trust that the planning department will review the proposed fire escape proposals with suitable authorities before passing these proposals, and also consider the potential all-night noise nuisance of the proposed new air conditioning units.

Your faithfully,

Richard Porter