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22nd September 2021

Regeneration and Planning London Borough of Camden 2nd Floor, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE

Dear Sir or Madam,

Flat 16, St. Stephens Close, Avenue Road, London NW8 6DB

Please find attached our application for 'Replacement of 4 no Crittall steel windows with white polyester coated aluminium louvre panels to the clerestory upstand which extends above the main roof level.'

Design and Access Statement

The proposed scheme is to replace 4 no Crittall steel windows with white polyester coated aluminium louvre panels to the clerestory upstand which extends above the main roof level. Its original intention was to provide natural daylight over the internal toilet and bathroom 3 directly underneath. The reasons for the need for louvres in lieu of windows is explained in detail below.

The previous owners of the flat had installed suspended ceilings within the bathroom and wc under the clerestory, so the windows ceased to serve a purpose.

As shown on our plans, the clerestory upstand also encapsulates a vertical services shaft which incorporates the vertical drainage from the wc and bathroom each side and rises full height throughout the building.

Each flat below has an identical layout of habitable rooms and bathrooms and riser shafts.

In terms of extracting air from the bathrooms either side of the vertical shaft each has an open duct to the shaft, so there is in theory a passive stack ventilation system (i.e. there is no extract fan assistance), though it is unclear to us where this extracts to, if at all.

It can be seen from the accompanying roof photographs there is no duct extracting through the roof, but there may be some form of vent under the flat roof overhang.

This system is defective for 2 reasons. Firstly, there are no fire breaks between the riser shaft and bathrooms/wcs adjacent to it. So should a fire break out in any of the flats below, the

duct would act as a chimney to spread fire throughout the building to the flats above. This fire risk is exacerbated by one of the flats below (we do not know which one) which discharges its kitchen extract into the duct, because cooking smells can be detected from the ducts linked to the shaft, and moreso when the internal shaft access door is opened. We do not know if the landlord is aware of this unauthorised use of the shaft to extract kitchen smells from a flat below.

Similarly, the two separate en-suite bathrooms in the flat also use passive ducts to extract air up to roof level, they can be seen on the accompanying plans (slightly remote form the bathrooms but linked with a duct at ceiling level. They can be seen as brick upstands on the roof photograph. As above there is no fan assistance with these 2 ducts and we are unsure as to how effective they are in extracting air, they certainly would not meet current building regulations for extracting air from bathrooms. They are likewise a fire risk between flats (which have identical layouts) in that fire can potentially spread between flats unabated via these ducts.

If the three shafts do work as they are intended to do then this is incredibly inefficient from an energy conservation standpoint as they will always be allowing warm air to escape on a permanent basis. It is the same as having a permanent open hole in the outside wall of the flat. The applicant is the recent owner of the flat, and a comprehensive refurbishment is underway, including internally insulating the walls and mansard roof, which was constructed of uninsulated solid concrete construction. All box sash windows have been replaced with like for like glazing patterns, but double glazed. So, the open ducts are thermally a weak point that the applicant wishes to eradicate.

In summary there are three internal problems identified: 1 The risk of fire spread between the flats below via the three vertical ducts

2 Ingress of kitchen smells into the flat via the main service shaft

3 Heat loss via the permanent open vents

So, in order to solve these three serious problems firstly the three ducts will be sealed to eradicate the fire risk to flat 16, and shut off the kitchen smells from below. it is then intended install a self-contained mains ventilation heat recovery system (MVHR).

An MVHR system is an energy efficient air recirculation system that pulls air from the kitchen, we and bathrooms, recovers the heat and provides fresh air into habitable rooms. So, it will be possible to have tempered fresh air even in the coldest conditions without having to open windows.

While this is an internal installation, it requires external alterations to accommodate the system, hence this planning application

The proposals utilise the clerestory upstand to house the heat exchangers.

Replacing the four redundant windows to the clerestory with louvres will give a neat external appearance and will allow the intake and exhaust ducts to terminate behind the louvres.

The plan configuration of the clerestory is ideal in that the intakes can be positioned on one window and the exhausts positioned well away from the intake at 90 degrees.

There is a need for two smaller MVHR units rather than one larger unit due to internal space restrictions of the clerestory and the configuration with the central services shaft which cannot be crossed with ducts.

The left-hand heat exchanger will extract from the two en-suite bathrooms and supply air to the lounge, and bedrooms one and two

The right-hand heat exchanger will extract from the kitchen and bathroom 3, and supply fresh air to the kitchen/dining area, back corridor and bedroom three.

In conclusion, the replacement of the redundant windows with louvres enables the installation of a comprehensive energy efficient air circulation system.

It secondly allows the eradication of a significant fire risk to the flat, at a time when fire spread to blocks of flats is an issue of great concern, and any simple solution to eradicate a risk must be welcomed.

Thirdly the nuisance issue of kitchen smells from another flat in the block will be likewise eliminated.

We respectfully request your consideration of these matters which eliminate two risks and contribute to the energy efficiency of the flat.

Yours faithfully,

Patryk Ingram

Encls.

Cc Mr D Ezekiel