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**From:** jeff travers [REDACTED]  
**Sent:** 21 March 2023 00:10  
**To:** Kate Henry  
**Cc:** Planning Planning  
**Subject:** Fwd: Comments on 2022/1680/HS2 have been received by the council... But Camden have not published them on the website for this application

**[EXTERNAL EMAIL]** Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Dear Kate

On 6th February I posted comments about HS2's proposed Adelaide Road Headhouse Schedule 17 submission on Camden's Consultation website but they have not been published on Camden's Planning Application website.

My comments were very similar to those I sent you in my email reply of 31st January to your email response to my earlier email. My email of 31st January noted to you that it should be treated as my consultation comments on the revised submission.

Neither my comments via Camden's consultation website dated 6th February (below) nor my emailed comments of 31st January have been published on Camden's Planning website.

Please publish this email as my comments on 2022/1680/HS2 aswell as my email to yourself of 31st January and the comments that I posted on Camdens website on 6th February.

Many people have told me they wished to post their comments but only to tell Camden that they support my comments. They have told me they have not been able to do this because Camden have not published my comments.

I shall tell them that they can send you their comments by email now (ie after the consultation deadline).. in the belief that my comments will be published on the Camden Website shortly.

You told me in your email response in January that you would be looking into the two issues I raised about HS2's Lead Architect's misleading explanations given to ECRG that

1 the Head House would not be visible from the Regents Park Road Bridge and so would cause no visual impact to Primrose Hill's public spaces.

2 The head house (as proposed) will be an appropriate engineering landmark when viewed from the railway below the bridge... (saying it would "reveal the machine" in the style of HS2's other headhouses.. which "celebrate this groundbreaking infrastructure project").

I requested that Camden must require SCS to provide accurate visualizations to identify the visual impact that the headhouse will cause to Primrose hill at the bridge in order to formulate mitigation for Primrose Hill.

You told me that you would let me know the result of your consideration of these.

I understand from my local Councillor that Camden have now asked SCS to provide this visualization... but I have had no confirmation from yourself.

I would be grateful if you would

1. email me to update me regarding the visualization that I requested from the bridge.

2. publish my comments (below) on your web site.

Regarding 1, this is important as the matter is an open ECRG action item .. and it is currently minuted that HS2 should withdraw their misleading explanation. I note that the Construction Commissioner attended the ECRG meeting when HS2 gave the false information. It was not a slip of the tongue. HS2 showed two slides of the bridge (not in the ECRG documents) to (falsely) prove their point. The commissioner will be updated shortly.

The obvious issue is that HS2 policy is to exploit this prominent site to push their brand at the expense of the local context and are prepared to provide Camden with false information to achieve this. This is even more serious as it is indicative of HS2's "collaboration" policy with Camden... re other subjects (like Euston). It also indicates that other HS2 explanations are probably unreliable.

Regarding 2,

A) My comments note that SCS's submitted a revised illustrated elevation drawing (which shows the headhouse surrounded by trees) which is also misleading .. (as most of the trees are impossible, fictitious or grossly exaggerated) to make the building seem "integrated in the landscape" (to quote the D&A Statement)... and therefore not to require mitigation. This drawing needs to be corrected.

B) My comments also note that HS2's rebuff of Camden's request for mitigation in the form of cable supported green-walling is misleading. HS2 told Camden that green-walling undermines warranties and prevents maintenance access (to the cladding).

My comments point out that timber cladding can be thermally treated to provide 60 year life... so (effectively) maintenance is not needed within this timescale for such timber cladding behind green-walling... and there are also no warranty issues. I gave you a telephone number to confirm this. This is the link to a supplier's website...

<https://www.vastern.co.uk/cladding/brimstone-british-tmt/>

C) I explained that the timber cladding is decorative and not functional... and is not justified by engineering necessity (and is therefore within Camden's remit under Schedule 17 of the HS2 Act)

D) My comments also noted that the Regents Park Road bridge features in two of the six "significant views" for sub-area 3 of the Primrose Hill Conservation Area Statement. Sub-area 3 contains Regents Park Road which is the main tourist street in Primrose Hill. So the headhouse's visual impact on these views is not just local impact. The green backdrop that the headhouse destroys is of international consequence. I sent you my own visualizations from the bridge and the area around it to enable you to check the accuracy of SCS's visualization.

E) I should also note that my comments also identified at least six more visualization viewpoints that are needed in order to understand the visual impact of the Headhouse on Primrose Hill Ward. In a subsequent comment to you which Camden have published I have identified one more viewpoint which is a historic view of the Listed Grade II\* portals across the HS2 site which juxtaposes the east elevation of the head house with the portals. This visualization is essential to determine the mitigation needed to the headhouse to reduce the visual impact of the current unmitigated generic proposals for the head house and ensure they are appropriate to the historic view of this heritage asset (which is of importance to tourism but can't currently be seen from any other public place). I need to emphasize that the portals can currently be seen through the HS2 compound gates but the finest view of the historic portals has existed from the top deck of no 31 buses for over 100 years. So the visualization view point could be from the top deck of a London bus at a location to the east of the head house which gives a full view of the portals. My comment on the design of the brick boundary wall and railings is that this needs to incorporate an opening for viewing the portals from the pavement on Adelaide Road (similar to the opening to view St Paul's Cathedral from Richmond Park).

F) The revised submission makes some of these viewpoints particularly important because SCS's plan now shows the roof to be cluttered with engineering equipment to replace most of the green roof. This will be in full view of a number of locations.

G) If Camden have responsibility to ensure the headhouse cladding suits the local context.. (as the Government says they have)... then it must challenge HS2/SCS when they tell Camden (as they did at the last pre-app meeting) that they can relocate equipment on to the headhouse roof in public view at any time without any cladding and without Camden control. The implication is that the purpose of the headhouse is to mitigate the appearance of such equipment by cladding or screening it ... so it suits the local context... ie not to "reveal the machine" with no cladding for whatever equipment they chose to display on the roof as sculpture.

H) Many of SCS's arguments are based on their misleading advise that the design is entirely an expression of "function" and not aesthetic preference. This is clearly not the case. But Camden should give SCS the opportunity to identify precisely what parts of the cladding are driven solely by function.. and what that function is.. ie within additional planning submission drawings. Otherwise Camden should assume that their use of the word functional is stylistic (eg functionalism).

For example the exact locations of the vent grilles need to be identified as functional. And the timber cladding needs [to be](#) identified as a purely aesthetic preference.

Best  
Jeff Travers

----- Forwarded message -----

From: <[planning@camden.gov.uk](mailto:planning@camden.gov.uk)>

Date: Mon, 6 Feb 2023, 23:14

Subject: Comments on 2022/1680/HS2 have been received by the council.

To: [REDACTED]

1 Camden have confirmed to me that Camden will take note of consultation comments received after 6th February (ie up to the determination time)

2 Camden have confirmed in writing to me they will look into my concern about HS2's false denial of the visual impact of the head house on Primrose Hill which HS2's Lead architect publicly denied at ECRG in September (by saying the headhouse will not be visible from the Regents Park Road bridge).

3 I should note that views from and of the bridge are two of the six "significant views" listed for sub-area 3 (which includes the main tourist route) in Camden's Primrose Hill Conservation Area Statement. The nature reserve woodland that HS2 have removed made a significant contribution to the quality of these views.

- Bridge approach and Regents Park Road (view South across railway bridge towards the Conservation Area and the intersection of Gloucester Avenue, Regents Park Road and King Henry's Road).

- Regents Park Road (View north of the railway bridge)

It also should be remembered that to many local people the woodland view (of the 500 plus trees that HS2 have removed) was more than just picturesque green backdrop.. or rather.. part of its significant aesthetic value was its visual meaning as one of Camden's few designated nature reserves (ie wild places)... it psychologically represented (and served as) a major green lung.. (with much greater benefit to air quality than the small mostly ornamental replacement street trees of HS2's Assurance) and it also reassured people of their place in nature and that biodiversity is sustainable in Camden.. so residents knew that many of the birds and bats that fly around the local area (eg Primrose Hill and Belsize Park) nested and roosted there. HS2's D&A Statement Section 6 notes that replacement can be carried out as an opportunity for thirds loss

At the ECRG meeting last September, HS2 justified their current gigantic (supposedly functional)

headhouse style (which they call "revealing the machine" .. "to celebrate this outstanding infrastructure project") as being an appropriate style for the existing railway estate... (but admitted it was not appropriate to Primrose Hill public spaces, from where they incorrectly contended it wouldn't be visible)... So .. if their requested accurate visualizations from the bridge prove them wrong (ie prove that it is visible), Camden must insist on adjustments to the submitted drawings and documents to mitigate such railway impacts ... to ensure the headhouse's appearance is appropriate to Primrose Hill... eg by screening a lot of the structure and reducing its visual impact

I have just been advised that Camden have now asked SCS to produce visualizations from Regents Park Road Bridge to check the impact of the headhouse on Primrose Hill Conservation Area.

There is a question mark about the accuracy of HS2's evidence... eg last September after I persuaded HS2 to explain their design concept of "revealing the machine" to ECRG as an action item.... I was surprised that their Lead Architect gave such importance to explaining that the vent shaft could not be seen from the bridge (and Primrose Hill). He played down the currently proposed gigantic size (compared with the low screened building "embedded in the landscape" in the original concept sketch fig 38 on page 45 of the D&A Statement) and even had the foresight to bring along two photos of the bridge (extra to the previously issued meeting presentations) and he (falsely) claimed his bridge photos supported his contention that it would not be visible. So in response (at the November ECRG meeting), I tabled my own visualization demonstrating the immense visual impact on the view from the bridge to support the (minuted) demand that HS2 correct their false assertion at the next ECRG meeting and mitigate the visual impact.

HS2's denial of visual impact is particularly ironic because the vent shaft will be so prominent from the bridge that HS2 have said it is explicitly intended as "sculpture". So the famous view from the bridge is the obvious location from which HS2 will take its PR photos for the new railway for which the head house will be the only freestanding architecture in Central London.

And I know from my rail design work (HS1 etc) that brand design sets the design priorities... in order to sell train tickets.

I feel that I need to draw to your attention to the following two issues to ask you to look into other missing and incorrect information in the planning submission...

A) as well as the absence (from the Schedule 17 submission) of visualizations from the bridge... visualizations from other viewpoints in Primrose Hill are also lacking

B) several of SCS's submitted drawings that show mitigation (labelled "for information") are intentionally inaccurate... so as to falsely suggest that more mitigation isn't needed.. eg the revised illustrated elevations show many trees in close proximity to the building which appear to screen it and integrate it into the landscape with a green corridor... when in reality the trees are fictitious (impossible, greatly exaggerated in size, or in the far distance). Some trees are in the middle of the railway cutting. Others are in the treeless zone of the graded embankment planting that (SCS have explained to ECRG) NR insist must exclude trees close to their existing retaining wall. Also at ECRG, HS2's Lead Architect described the row of giant ornamental trees screening the building from Adelaide Road as being "unrealistic".

To help Camden check the accuracy of the visualization from the bridge (that you have required SCS to produce), I have previously emailed Camden's Case Officer (for inclusion with my consultation comments) my visualizations of the headhouse impact from three viewpoints on and near the bridge (together with their geometric basis.. in plan and section). I also include the submitted SCS revised illustrated elevations ("for information") which I have annotated to show the false SCS information (ie where the mitigation has been fiddled to pretend the building can be integrated into the landscape... It clearly needs much more mitigation to achieve this required integration).

The faking of the trees and vegetation also maintains HS2's pretence of the "green corridor" for "ecological connectivity" .. which is a statutory requirement. I'm assuming that pursuing this statutory "green corridor" falls outside the remit of the current Schedule 17 determination.



HS2's previous public pledges to improve the site's biodiversity are impossible to fulfill and not required by the Act which allows the offsetting of Camden's biodiversity loss elsewhere in the country)... but I understand that the provision of a "green corridor" is required comply with the HS2 Act. I note that section 6 of the D&A Statement states the current submission's lack of an adequate effective green corridor may be remedied in future as an opportunity by third parties and is outside scheduled works. This is entirely inadequate. The Act makes it clear that needs to be scheduled work.

From Camden's Pre-app meeting minutes with HS2 and SCS... which I have obtained via FOI, I understand that Camden requested visualisations and mitigation several times but SCS repeatedly rebuffed these requests (using blatantly spurious and vague general reasons).

Underpinning this rebuff is SCS's repeatedly stated intention that the building must express a (functionalist) design ideology ... and "integrate" this within the restored landscape. But they assert this landscape should be "ornamental"... ie presumably a geometric style of landscape to emphasize the supposed "functional" boxiness of the building. But I note that Camden rebuffed this saying that the restored landscape must be natural and consist of native species... ie not ornamentals.

Notwithstanding this, the current submission shows the restored landscape inside the Adelaide Road boundary is a long row of giant fastigate ornamental trees .. a formal geometric statement in front of the gigantic blank facade which is unacceptable

I'm concerned that Camden may accept the false reasoning of SCS's high-level rebuttals of Camden's mitigation requests and also Camden will be unable to provide SCS with the specific detailed design alternatives that SCS say they need (from Camden) to make them change their design further. So to help Camden negotiate mitigation appropriate to the local context.. I give you the following information regarding

- i) the extra accurate visualizations that are needed to identify impact compared with the same views before. And for accuracy the security fences (which are only shown as a line in plan and section) need to be shown.(for information)
- ii) the mitigation to offset adverse visual impact revealed by the visualizations
- iii) the debunking of SCS's functionalist style objectives and constraints.. which is essentially about essentially brand image (to promote the rail-line)

In more detail (to be useful to Camden)

i).. Visualizations are also needed from the following viewpoints...

a) King Henry's Road homes overlooking the railway. Section 6.5 of the submitted Design and Access Statement titled "Urban Integration Opportunities"...states SCS's objective is "mitigating and enhancing views from residential properties".. Views from King Henry's Road homes are specifically identified on the diagram. Should SCS require access for photography I can arrange. Photos of the woodland nature reserve prior to clearance are also available.

b) King Henry's Road street .. the gaps between houses and 120 metres of unobscured view at the east end (eg the view approaching the bridge impacts a major public space of international standing).

c) Blashford Tower: yesterday I checked the view of Blashford looking up from the east boundary of the Nature Reserve.. and I can testify that almost every flat on the east and south side are in full view of the head house and vent stacks.

d) Adelaide Local Nature Reserve... I note that the Pre-app meeting minutes record that SCS rebuffed Camden's request for green walls to the west elevations of the vent stacks facing the Local Nature Reserve by saying that there is no visual impact because nobody visits the LNR. I endorse Camden's rebuttal of this and can testify that on Sunday about 50 people visited the LNR. And it is only NR's current use of the LNR for access plus a dangerous wall (that I reported and has since been made safe) that has

temporarily prevented use of the LNR for school nature visits

e) The homes in Nos 68-78 Adelaide Road... these homes are identified on the diagram in section 6.5 of the D&A Statement noted above.... the visualizations need to pay particular attention to accurate views of the few remaining patches of green roof planting and the many pieces of engineering equipment (that have just been relocated to the roof)... viewed from the top floor flats. Regarding the equipment.. I note that SCS are recorded in Camden's pre-app minutes as saying that Camden have no control over their roof equipment. This seems unlikely in this instance because the purpose of the headhouse is to house such engineering equipment. So for SCS to intentionally relocate much of the equipment outside the Headhouse (without any housing) to avoid control and mitigation... cannot be authorized by the Act.. And any housing or screening must be under LA planning control. No equipment was shown on the roof on previous drawings.

Such equipment clearly needs to be housed.. eg for noise insulation. The raised parapet appears to have no function.. it is not an effective noise insulation measure. It also hides roof vegetation and unnecessarily exaggerates the height of the building on all sides. A stainless steel handrail set back from the parapet would suffice.

ii) Mitigation ... Camden have requested several times... 'green walling'.. particularly cable supported green walling.... But in the pre-app meetings SCS repeatedly dismissed this request using general, 'high-level' arguments. And SCS challenge Camden to prove feasible alternative mitigation. But without a full knowledge of SCS's design constraints Camden can't provide this. Camden can however require low level feasibility information.. eg initially about particular areas... eg the east and west facing walls and cladding. I go into this in more detail below.

SCS's dismissals of green-walling are incorrect however. They have said that it is not feasible because it will prevent maintenance operations and undermine warranties.. and by this they must mean particularly that the warranty on the timber cladding is the issue... (it being obviously out of the question to install green-walling over doors, windows and vent grilles).

Despite SCS proclaiming the building to be an expression of function... the timber cladding to the upper parts of the building is not a functional requirement .. It is decorative (as explained below) and it may not be desirable behind green walling (in the particular areas where green walling is feasible). Another type of cladding (to timber) that has no warranty issues would clearly be a feasible alternative.. enabling it to be screened by climbing plants.

My previous experience is of designing advanced timber clad buildings in conjunction with TRADA. I can advise that untreated timber cladding need not have warranty problems in conjunction with green walling at all.

Such timber cladding will not need maintenance access for 50 years.. ie it does not need periodic coating etc. I suggest Brimstone (heat) treated UK ash or sycamore or poplar (heartwood) which will quickly weather naturally to shades of light grey. A mixture of all three with varied sized sections (but predominately ash) would appropriately echo the species that SCS have cut down in the nature reserve (predominantly ash). Camden could fact-check this with Vastern Timber.(01793676784) who TRADA recommend.

The only maintenance that might be required would in fact be to the green walling panels.. ie trimming vegetation etc. And obviously it's absurd to suggest that green walling prevents maintenance to itself. I note that mixing the species and sizes of the vertical timbers could create the variation that Camden say they seek... particular if broken by green columns of vegetation and green panels of different widths and species.

SCS's mention of maintenance issues (as relevant to Camden's mitigation requests) requires such issues to be resolved for this determination.. particularly building maintenance vs nature conservation management. For example ... what is the respective scope of these? Building maintenance will be required but nature conservation is a statutory requirement too. So for example... are chemical weed killers to be used to clear paving in the green corridor... which is barely wide enough for maintenance access.. and certainly too narrow for a ladder? If ivy grows up the walls and security fencing.. will building maintenance contractors

remove it? The Independent Design Panel suggested bat boxes be installed on the facades.. would these be maintained as building maintenance or nature conservation? Particularly HS2's 'No Net Loss in Biodiversity' CoP requires nature conservation management principles for sites to be established with the local authority... and as a consequence of SCS raising maintenance issues as relevant criteria to the feasibility of mitigation.. this can't be left to to be resolved at the 'bringing into use' Schedule 17 submission in years hence.

iii).. Debunking HS2's Fake Functionalism.. SCS's distinction between "functional" and "ornamental" stylistic elements of building and landscape and its validity to the SCS objective of "integration" of the headhouse into the landscape.

The pre-app minutes record that SCS argue that their design is a purely functional expression of their engineering and their perforated cladding expresses the vent shaft's air-flow.. in a manner similar to the approved LUL vent shaft in Euston (aka the sugar cube). I know however that this functional expression is completely fake. The Euston vent shaft's perforated facade hides a substation and a staff rest room .. and is not part of the tube ventilation system. The vent duct itself is a very small vertical duct in one corner that terminates on the roof without requiring perforated walling. Similarly the tunnel ventilation plant at Adelaide Road is below the carpark and enclosed in solid brickwork. The tunnel ventilation is via the separate vent stacks of solid brickwork with metal vent grilles. I'm told that the allegedly perforated vertical timber slats of the headhouse are not functional at all but are a purely decorative rainscreen. Any secondary ventilation (eg to ventilate spaces) is via metal vent grilles. So the advertised 'functionality' of the timber slats is fake.

And SCS argued that this fakery be extended into the landscape.

The pre-app minutes record that SCS argued to Camden that the restored embankment landscape should be made "ornamental" in order to "integrate" it with their boxy neo-brutalist (so-called) "functional" building forms (as noted above). Ie as an extension of the neo-brutalist geometry. But Camden rebutted this to say the landscape would be natural... not ornamental.

Therefore if the building is to be integrated into the natural re-landscaping.. then the building cladding itself must be the subject of mitigation.. to reduce its apparent boxiness and exaggerated scale by introducing smaller scale natural features like green wall screening that mediate the functional expression of the building's purpose (eg the metal vent grilles) with the natural landscape. Otherwise the building won't be integrated but will stick out like a sore thumb (as per the current birds eye view visualization) . And Camden will have grounds to reject this application.

In order for Camden to understand the scope for mitigating the current facade design... and discuss the feasibility of mitigation details... Camden need to request that SCS provide drawings that identify (exactly) all the areas of solid external wall in each facade... and the (exact) minimum extent of all the openings that are visible (eg doors and windows) as well as those that may be concealed behind vent grilles, timber cladding and lightweight panels.

SCS also need to provide drawings that identify where the overhanging cladding and vent grilles are functionally necessary and where the overhang is just for effect. Similarly the roof parapet.. eg although a 1 metre high safety rail may be needed (eg set well back from the facade)... most of the current parapet cannot be functional.

Comments made by Jeff Travers of [REDACTED]

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Preferred Method of Contact is Email

Comment Type is Objection

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