
From: jeff travers [REDACTED]
Sent: 22 March 2023 16:21
To: Kate Henry
Cc: [REDACTED]
Subject: Re: ECRG papers update: Adelaide Road Sch 17

[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

Re ECRG Action 326 about the green-walling as mitigation.

SCS's response on the Action Schedule (in blue below) was to my concern about SCS's rejection of Camden's request that much more greenwalling be installed to mitigate the visual impact of the headhouse and vent shafts on this Nature Reserve site.

The justification of this rejection is technically inadequate because it is a vague and high-level (generalising about local constraints) maintaining that green-walling is not feasible anywhere on the main building when there are clearly areas of the main building where green-walling is feasible. I was seeking more detailed criteria as to where SCS claimed green walling was not feasible. Government Sch 17 Guidance para 35 stipulates that Camden's requested mitigation must not compromise the functional features of the proposal, and the response to Action 326 states that green-walling compromises these functional requirements so is not feasible (except to at a very small area near the ground). But the reasons given in the Action response do not identify and distinguish the specific locations of different functions and so do not support the conclusion that green walling is generally not feasible.

It is essential that green wall provision be incorporated in the cladding system and identified on the elevations of the current Schedule 17 application (which should be revised) ... and green wall provision should not be deferred until the 'Bringing into Use' application in years hence.

The Action 326 response gives the reasons that green walling is not feasible as

- 1 green-walling will obstruct ventilation grilles.
- 2 green-walling will impair the security system

SCS's other previous functional explanations to Camden (not mentioned in Action 326 response) are published in email correspondence submitted with the application

- 3 that green walling will invalidate cladding warranties (presumably to the timber cladding).
- 4 that green-walling will prevent maintenance operations (presumably to the timber cladding).
- 5 that the retaining wall will prevent root growth at the chimneys (aka vent stacks).

Regarding 1... obstruction of ventilation openings. It says "*not viable on the majority of the headhouse regarding the functionality of the chimney*" But this makes no sense because the two "*chimneys*" or Vent Stacks for the tunnels are completely separate structures to the headhouse and SCS has explained to me that the smaller headhouse vent grilles only ventilate the internal rooms (not the tunnels) and the vertical timber slats are not for ventilation but instead are merely a visual rainscreen (and non-functional).

While it is true that green-walling would obstruct vent grilles behind it... this does not apply to most of the cladding. It is therefore imperative that SCS identifies within its Schedule 17 submission the exact locations of all the openings in the external walls where green-walling will obstruct the function of the building. And

elsewhere (over the majority of the headhouse) the ventilation function can't be used to argue that green-walling is not viable. I should note that (as well as vent grilles) green-walling mustn't obstruct doors, windows and access panels.. so the locations of these openings should be included in the drawing showing all the openings noted above.

Regarding 2... impairment of security system. SCS have maintained that the security system has not yet been designed. So it is invalid to argue that green-walling will affect its functionality. Security systems are tertiary design elements and would normally suit the chosen cladding system including green-walling (which could of course be adjusted to suit the security system in particular locations). It is important not to let future unresolved 'Bringing Into Use Schedule 17' measures constrain solutions for the current application.

Regarding 3... invalidation of cladding warranties. The email doesn't specify what warranties.. but it is assumed this can only mean the warranty/guarantee of the the timber hit and miss cladding to the headhouse building.
Brimstone thermal timber treatment which comes with a guaranteed lifespan of 60 years. There is also no functional reason why other cladding materials couldn't be used instead of timber behind areas of green walling.

Regarding 4... obstruction of maintenance.
Brimstone treated timber need no maintenance for at least 60 years. It is however likely that the vegetation of the green-walling will need periodic conservation management. But HS2's No Net Loss in Biodiversity CoP states that such maintenance is an essential provision for reducing biodiversity loss... and it is essential to negotiate this with Camden, NR and Local Nature Conservation Groups. Such a negotiation would obviously distinguish the functional maintenance cycle of building elements from nature conservation management operations for the site once it is restored as a nature reserve (SINC)... eg swift boxes fixed high up on the external wall or bat roosts to be incorporated in the cladding as promised in the submitted D&A Statement (though not shown on the drawings)

Regarding 5... obstruction of planting by retaining wall. Climbing plants do not need to be planted at the base of walls. Eg the HS2 site and previous Nature Reserve trees were previously covered in creeping mature ivy (as is the adjoining area of the Camden nature reserve). In this location near the nature reserve boundary.. there will be a continual maintenance operation of removing ivy spreading up the brick facing of the chimneys from the Camden Nature Reserve. The site is a SINC requiring nature conservation management so the submission should reference this continual green incursion rather than deny it. However pockets for planting would normally be designed into the tops of retaining walls for intentional green walling planters.

It is also clear that (unlike the Action response) the email correspondence does not say that green walling is impossible. It just notes particular local difficulties. And in the appendix to the D&A Statement the Independent Design Panel insist that SCS should stop trying to screen the building .. but rather the unscreened headhouse should "reveal the machine" "to celebrate this ground-breaking infrastructure project".

This demonstrates that green-walling has not been generally excluded for '**functional**' reasons (outside Camden's remit)... but for aesthetic reasons within Camden's remit and so green walling should be part of Camden's palette of mitigation measures under Schedule 17 ... to mitigate the impact of the "revealed machine" appropriate to its nature reserve setting and to minimize its damage to the local context as consistently requested by consultation comments

*Action 326: Green Wall mitigation re visual impact
JT commented that green walling was needed at the earliest to help screen the facility.*

*Steve Austin wrote on 21.11.22...
The Design and Access Statement confirms that the functional requirements of the building such as those relating to ventilation and security means that it has not been possible to incorporate additional green walls other than what is proposed on the southern*

elevation. Additional planting has been confirmed to not be viable on the majority of the headhouse regarding the functionality of the chimney. Climbing plants could potentially block the chimney and catch fire from heat in the event of fire.

Best
Jeff Traver

On Wed, Mar 22, 2023 at 3:53 PM jeff traver

Dear Kate

Re ECRG Action 315 & 324 about impact on Listed Portals.

Action 315 (quoted in blue below) is incorrectly classified as "closed" on the current schedule but the November minutes document that it was decided that it should remain open. Action 324 (quoted in blue below) was registered at the November meeting about exactly the same issue as 315 but no response is scheduled.

The scheduled response to Action 315 does address the issue at all so therefore was not closed and therefore the request for a response was repeated.

Both actions explicitly requested evidence to demonstrate that the headhouse design took account of the historic Grade II* Listed Portals nearby. However the response to Action 315 does not reference the portals at all. Instead the response was about SCS's choice of materials for Adelaide Road selected from the restricted linewide materials palette based on SCS's vague notion of the urban context (in contrast to a rural context).

The Heritage section of SCS's submitted Design and Access Statement also doesn't mention the Listed portals. This is surprising as they are world famous, very striking and just a few yards away... a monumental baroque sandstone structure constructed in 1837... the first of its kind. Neither are the portals mentioned in the Heritage section of the submission's Written Statement (quoted in blue below). The submission needs to justify the design expression and materials of the headhouse because the design and materials of the portals are completely different to the style of the headhouse and its chosen materials. So the proposed design of the headhouse will totally conflict with the portals when viewed together Action 324's question is specifically concerned about how the headhouse design is appropriate to the portals when viewed together from a public place. But no response to this is registered.

The only current public viewpoint to see the portals is from Adelaide Road which is the viewpoint of the attached historic engraving of the portal. This view has been available to the public for over one hundred years from No 31 buses. Currently the historic view is also preserved through the open west gate of HS2's site. On completion, the headhouse will block the view from the west gate. However the historic view of the portals will be preserved (framed by the headhouse) through the east compound gate (see the attached, HS2 tunnel alignment layout with this view of portals and headhouse shaded sepia).

Schedule 17 explicitly requires that HS2 do not damage such a historic view. So SCS need to produce a visualization of this historic view of the portals that shows the headhouse from the location of the east compound gate on Adelaide Road in order to show the visual impact of the proposed headhouse design on this view.. and identify whether mitigation is required to the design of the headhouse to appropriately frame the portal. Otherwise there is a risk that the historic view could be spoiled. A small adjustment will however definitely be needed to the design of the brick boundary wall and railings and to the security fencing if the historic view is to be seen by pedestrians on the pavement outside... eg tourists.

For example the boundary wall would need to incorporate an opening so the portal can be seen from Adelaide Road (ie similar to the opening in Richmond Park that preserves the historic view of St Paul's).

The HS2 Heritage Memorandum (quoted below) gives local authorities clear guidance regarding LA Determination of Schedule 17 submission proposals that impact heritage assets. So clearly Camden's determination of the current Schedule 17 submission is dependent on SCS submitting further further information on this subject including a visualization.

Schedule 17. This adds the test that the headhouse design "should be reasonably capable of being so modified".

My email about Action 302 demonstrates that SCS's four arguments that modification of the design (ie by green walling as requested by Camden) are not technically credible. So the design is capable of being modified. I show that SCS's arguments that mitigation using green walling is not feasible are merely high-level general 'opinion' and therefore misleading. Completely different and more detailed reasoning is expressed in email correspondence published with the submission. This indicates that there is scope for green-walling in a number of locations that would mitigate the visual impact.

Action 315 (incorrectly closed) is as follows

AA to respond by email on how the headhouse design is taking account of the Grade II Listed tunnel portals*

AA's lengthy response on 27 October 22 does not answer the question.

Hence the question was reopened via Action 324 on 27.11.22

AA response of 27.10.22 is as follows

Local context and materiality were considered in design stages ahead of the Sch 17 Plans and Specification for the Adelaide Road Vent Shaft and Headhouse including photographic surveys undertaken to provide examples of the local context, character, materiality and colour. In addition Principal building and paving materials, principal boundary treatments and principal vegetation types were all studied. The materials palette considers the requirements of the Land Design Approach to ensure that the finishes and materials will suit local character and attention to detail is considered to help fit in well with rural or urban locations. The materials proposed in our design for Adelaide Road headhouse are timber, metal, concrete and brickwork. We are planning to use similar materials at all headhouses between Euston and West Ruislip. The materials palette has been chosen according to the environment, moving from brick through metal towards wood as we move between rural and urban locations.

Action 324 is as follows

LA recorded via the chat. There appears to be nothing about heritage in relation to the design - how that needs to be taken into account. In relation to Adelaide Road for example this relates to the proximity to the listed Portal structures. It would be useful to know how the design of the structure responds directly to this important context. There is also an ambition to open up the view of the Primrose Hill Portal as part of the Railway Heritage Trust proposal to have a Brunel Walk - this would be from the road opposite the headhouse (which would be visible from this view along with the headhouse). LA also commented: There is a requirement for the setting of a listed building to be taken into account - at the moment the Adelaide Road design does not acknowledge this context.

Martin Short has yet to reply (but response is dated 27.10.22)

The Written Statement submitted with the Sch 17 application doesn't include the world famous historic Listed Grade II* Portals in the section on the "Historic Environment"

Heritage

3.5.4 There will be an increase in the form and massing of the proposed structures associated with the proposed Adelaide Road Ventilation Shaft Headhouse when compared to the baseline ES design.

3.5.5 The (design) has implemented mitigation measures by responding to the character of the existing buildings, using carefully selected materials and finishes and through a sensitively scaled design, whose mass is appropriately distributed. The Adelaide Road Ventilation Shaft design has also taken into account the impact on the surrounding heritage assets including the Grade II Listed building, Regency Lodge, west of the site along Adelaide Road and the non-designated villas north of the site (PRM039) and Eton (PRM002) and Primrose Hill Conservation Areas (PRM060).

HS2 Heritage Memorandum

4.2 Setting of heritage assets

4.2.1 The planning conditions in Schedule 17 to the Act set out the principles to be taken into account as the material considerations or 'grounds' in determination of requests of the approval of certain plans and specifications, as well as other submissions by a qualifying authority (usually a local authority). For certain of these approvals, the grounds which the authority may take into account when considering whether to approve, condition or require a modification to a request for approval of design for an external appearance include "to preserve a site of archaeological or historic interest or nature conservation value".

Best

Jeff Travers

On Wed, Mar 22, 2023 at 3:31 PM jeff travers [REDACTED] wrote:

Dear Kate

Re ECRG Action 323 about engagement and reporting of Schedule 17 collaboration re Adelaide Road Head House.

Action 323 (quoted in blue at the end of the email) requires LBCamden to engage in reviews/workshops with SCS and HS2 about the progress of Schedule 17 engagement issues and for the community to receive a report (via myself).

But no report has been received and the Schedule 17 application is scheduled for the Planning Committee next week on 30th March.

I therefore had to resort to FOI Act and initiated a dialogue with yourself at Sharon Rodney's suggestion about HS2's blatant misinformation given to ECRG in September that appears to underpin SCS's Schedule 17 application. These have been productive but the dialogue is unresolved and suggests to me that the Planning Committee should be unable to properly determine the application on 30th March. Can you please confirm?

Blatant misinformation has also been given to ECRG by SCS regarding other ECRG Actions one of which was kept open at my request. I will email separately about each.

I'm copying this email to David Demolder and the ECRG Contact Group, to Camden Officers (Sharon Rodney and John Nichols) and to Camden Councillors (Heather Johnson, Pat Callaghan and Matt Cooper).

Regarding Action 323 ... this was initiated by Lawrence Whitbourne at June ECRG when he committed HS2 to joint collaborative reviews/workshops about impacts and mitigation solutions re the Adelaide Road Headhouse design. He said that attendees would be SCS, HS2, LBCamden and Community reps. The reason for this was because SCS had announced at the 'You Said We Did' engagement meeting that SCS "would not be doing anything" to mitigate their proposal for the headhouse in response to the

consistent and overwhelmingly negative comments of over 400 members of the public in their "Consultation" in Autumn 2021.

A post-meeting note in the ECRG meeting minutes states that community reps attendance was not possible because SCS had submitted a Schedule 17 Application. But Action 323 confirms that reviews/workshops will take place with reporting to ECRG (re design responses to consultation feedback re Sch 17) and Camden involvement.

No such report has been communicated however ... so I was forced to use the Freedom of Information Act for minutes of Camden's meetings with SCS/HS2.

The minutes revealed that the subject of the major visual impact to the east, west and south (that most of SCS's "consultation" responses were concerned about) had never been discussed.

On 12th January I therefore wrote to you directly about HS2's misinformation to ECRG which denied visual impact of their headhouse to the south-east on Primrose Hill for which no visualizations had been submitted for the Sch 17 application. So I requested that Camden require visualizations from the important entrance to Primrose Hill over the Regents Park Road Bridge in order to confirm that mitigation needs to be negotiated.

I told you that HS2's Lead Architect misleadingly insisted to ECRG that the headhouse would not be visible (only being visible from the railway below for which its line-wide style would be entirely appropriate as one of a family of similar structures. He called the style "revealing the machine"). In your response to my email you said you would investigate and let me know your conclusion soon.

I have not received your reply yet though I had heard a rumour in late January that Camden had requested another visualization as a consequence of my request. And a couple of weeks ago I discovered by chance that a visualization had been added to Camden's planning application website and you have instigated a further public consultation with a deadline last Monday.

Your only email response in January encouraged me to publicize your consultation so I immediately made public via Camden New Journal that there was a new visualization which revealed the HS2 headhouse (which is sited at the focal point of the view from Primrose Hill) will cause great visual impact and I said that Camden were keen to receive comments.

My letter ("Not the full picture yet..." CNJ 9th March 2023) makes the following three points on the new "photomontage" visualization (which I have also sent Camden as consultation comments)

1 The new visualization (attached) has been fiddled to minimize visual impact. It shows the building to be partly obscured by flats and vegetation. This was mainly due to HS2's poor choice of viewpoint.

But also foreground vegetation has been Photoshopped to hide the headhouse. And this trompe also makes the Headhouse appear "embedded in the landscape" (HS2's greenwashing pretense) even though... around the vent shaft... hardly any vegetation is evident compared with the woodland that HS2 have destroyed (notwithstanding that their attached "photomontage" is after 15 years growth). Also neither the legally required "green corridor" is evident nor the proposed security fence nor the green roof and nor the rooftop equipment which now replaces most of the green roof.

2 HS2's new submission does not include a photo of the woodland (from the same viewpoint) to provide a baseline to measure visual impact ... like my attached photo of the woodland (taken in May 2017 by Google). Instead HS2 only provide a pointless photo of their treeless excavated building site as the baseline.

3 The planning submission still doesn't address HS2's Lead Architect's blatant misinformation. when he publicly insisted this headhouse won't be visible from the pedestrian route on Regents Park Road bridge (the second of the Conservation Area's six "significant views" in subarea 2 which is the main tourist area).

So Camden need to require more visualizations re this omission.. and many others too.. eg north south east and west... or a video... like the one produced for the Chilterns... to identify the visual impact of another boxy HS2 headhouse at a mundane ring-road location. Such a video will enable the full impacts to be identified so mitigation measures can be agreed.

HS2 previously publicised use of advanced Building Information Modelling (BIM) for all their design work "to inform community engagement" was advertized to make accurate 3D simulation routine.

I'm writing to you now to request that you respond to me ahead of the next ECRG meeting tomorrow (Thursday) evening so the matter can be reported to ECRG re Action 323 to inform ECRG ie with details of the progress of the Schedule 17 submission ahead of next week's Planning Committee meeting.

Governmental guidance for determining Schedule 17 applications (para 35) requires LA's to require mitigation where HS2 (generic/engineering) designs adversely impact the local context. And the initial crude SCS photomontage clearly reveals major visual impact on Primrose Hill that needs to be mitigated. Therefore Determination to approve the application at the Planning Committee meeting on 30th March would be premature because mitigation is clearly needed. But before this can be discussed ... more visualizations are needed to identify the full visual impact on Primrose Hill of the unmitigated design.

The pre-application meeting minutes (which I have obtained via FOI Act) record that mitigation for the east, west and south elevations has never been discussed and Camden have only attempted to negotiate mitigation for the North elevation.

In my email to you in January, I point out Camden's need to further extend the determination process and that this would be understood to be the result of misinformation given to you by HS2 or their contractor. This misinformation clearly continues.

I quote Action 323 below for your reference. I also note HS2 and SCS's apparent failure regarding their agreed responsibility to respond to Action 323.

I also note that the Construction Commissioner was present at the September ECRG meeting and I will keep him informed.

The minutes of the last ECRG meeting in November record my request that HS2 withdraw its misleading denial of visual impact on Primrose Hill. This denial was clearly intentional and HS2's objective was clearly to justify expressing the head house as a prominent unmitigated sculptural railway monument (as noted in the D&A Statement)... replacing the previous woodland and totally out of scale with the context of nearby villas which were previously screened by trees but are "revealed" by the new visualization to be juxtaposed incongruously with the boxy headhouse.

As noted above, ECRG Action 323 is a response to Lawrence Whitbourne's commitment at June ECRG to set up review/workshops attended by Camden, SCS HS2 and community representatives to identify Adelaide Road impacts and explore technical options collaboratively. Subsequent minutes indicate that this collaboration appears to have been blocked. This blockage will inevitably create conflicting dialogues

that compromise Camden's determination process. I urge you to respond to ensure the diverging dialogues are resolved to permit Camden's future Sch 17 Determination to address the consistent community concerns about the significant adverse visual impact eg on Primrose Hill.

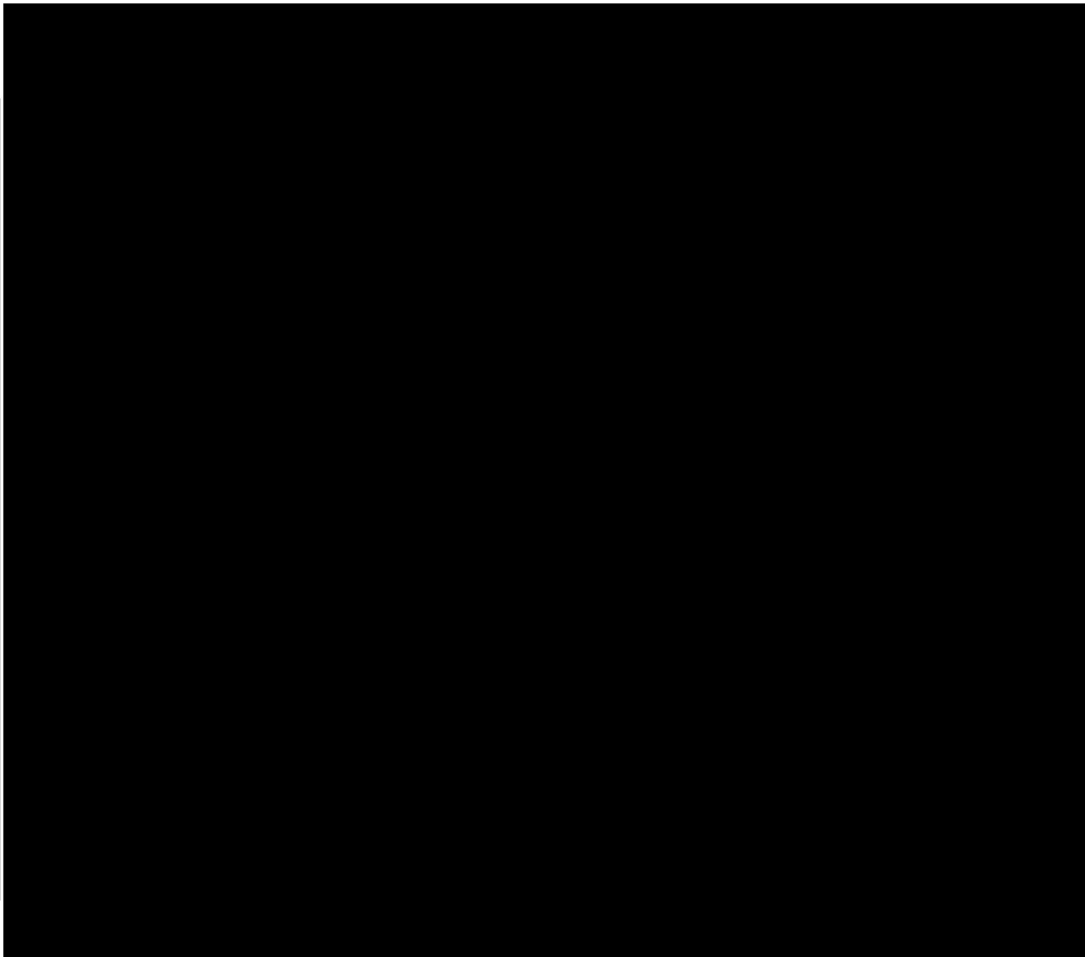
I would be grateful for your response to also take into account my separate emails about SCS's totally inadequate responses to ECRG Actions 315 & 324 and Action 326 both of which require further information to be submitted before Camden can Determine the Schedule 17 application.

Action 323 is documented as follows:

MS/AA to urgently convene an update/workshop session on the Adelaide Road Schedule 17 application. This is to also cover what is included in the application, how comments have been responded to and what will be applied for later. KM to arrange for LB Camden to be involved in this review

*Response (no name) 1.12.22
to remain open pending a meeting/workshop to discuss
An update on the progress of the meeting will be provided to JT*

Best



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