

THOMAS MUIRHEAD

Planning Application 2023/5338/P

"New application (Jan 10 2024) - Full Planning Permission"

Site Address: Alexandra Road Estate, Rowley Way, London NW8 0SN

"Replacement of the existing estate-wide heating distribution infrastructure including removal of redundant pipework; installation of two new sub-plant rooms; installation of cold water storage tank rooms; replacement of existing site hoarding and installation of new replacement infrastructure pipework".

"Development Type: Residential Minor Alterations".

Type of comment: **OBJECTION**

Major conservation issues

- I am a recently retired architect, a member of the TRA Heating Subgroup. As a former member of the Cases Committee of the 20th Century Society, I have expertise in heritage matters.
- This is the largest planning application ever submitted for the estate. The works described are not "Residential Minor Alterations". They would **affect every aspect of the Grade II* listing**.
- **Block A: the north elevation**, overlooking the railway, is often criticised for its "brutality". As a resident I have come to appreciate it. I often hear lay people, especially the younger generation, expressing appreciation of its uncompromising giant scale (some say it looks like a football stadium). it is **one of the characterising features of the estate**. It must not be interfered with.
- It is **deeply concerning** that the application proposes to attach new pipe assemblies fixed to each concrete fin, and wrapping round the sides, for the entire length of the building.
- The fins are a repeating sequence and are the most significant architectural element of this elevation. This proposed pipework would mar the clean lines of the fins, would cast new shadows across their surfaces, and would conflict with the lines, forms, recesses, projections, and shadow gaps of the overall appearance of the whole building. **Its architecture would be spoiled**.
- At ground level, where the pipes would be exposed to maneuvering vehicles, the lower part of each fin would be given an unsightly protective sheath. This would completely **destroy the dramatic upward thrust** of the fins as they rise, uninterrupted, from the ground.
- The application makes clear that the **conservation advisors were concerned** about the proposed pipework and asked for further evidence. In fact the Design and Access Statement (page 44) states "*It has been agreed with conservation advisors that the installation will be 'mocked up' on a single fin, for review*". The application provides **no evidence that the proposed mock-up was ever erected** or that the conservation advisors ever saw it, let alone approved it.
- **Block B:** the application proposes to attach assemblies of large-diameter distribution pipework running vertically up the terminal ends of the block. This would **irreversibly harm the surfaces of significant end elevations** and would visually damage the open spaces they enclose.
- New local distribution pipework to each dwelling would **adversely affect the front elevation** of all the lower (ground + basement floor) maisonettes in Block B, all the way along Rowley Way.
- Based on my technical knowledge and heritage expertise, the work described in the application would severely and irreversibly harm the architectural integrity of this Grade II* listed estate. →

Outmoded, clunky, unsustainable heating engineering concept

- This application shows **Camden's engineers stuck in the past**. The proposed heating system is **little more than a rehash** of the current 1960s heating system, still relying on hot water pumped all the way along the estate, wasting approx. 40% of the heat before it even gets to the dwellings.
- Worst of all, installing all the proposed new pipework would lock us into an antiquated traditional engineering concept that **blocks us off, permanently, from a different, better future system**.
- In response to climate change, new approaches are emerging every day. Camden needs to catch up this new thinking. **We need a 21st century system that does not rely on pumped hot water**.
- This can be achieved over time by retaining the existing system (not "patching up" the pipework but replacing it as necessary) until the gas boilers come to the end of their life. **The cost would be tiny, compared to the capital cost of £ millions** for the works described in the application.
- Then, use the time gained to stay abreast of the very rapid innovations in the new market for sustainable heating systems, and develop a **completely new heating system for the 21st century**.

No resident consultation, no time to understand the new documents, constant denials

- Residents were unaware of this application until it was published on 10.01.2024. We had **never seen the new documents and drawings until now**. We are given hardly any time to study them.
- There has been **no proper consultation with residents**: contrary to the impression given in some of the documents, **this application has never been discussed or agreed with residents**. **Residents have never been consulted** about any of these new documents and/or revised versions and have never been offered any opportunities to ask questions about them.
- **The TRA has been completely against the proposals in the application for the past 10+ years**.
- Every attempt made by residents, working with insufficient or non-existent documentation, to raise issues about the proposed new system has been batted away by supposedly "reassuring" responses. **Residents were left very much on their own** to analyse Camden's proposed system, using their own technically experienced members to uncover its technical defects and drawbacks. Residents have been "informed" (in controlled presentations) but not "consulted" in a real sense.
- At one stage the TRA organised its own meetings with residents. This led to **legal threats** and the possibility of having the whole TRA closed down. To pacify things and create the illusion of "resident engagement" Camden funded a series of workshops with an engineer, to develop alternative systems. After presenting the results of these workshops, along with our suggestions for further work, Camden's officers **broke off all communication for the ensuing nine (9) months**. They then suddenly released an avalanche of new documents never seen before, simultaneously announcing that they were going to continue with **the system we do not want, which is the system described in this application**. Thus Camden is able to claim that it consulted with residents but so far as I am concerned, that was a carefully calculated propaganda trick.

Summing up: we must safeguard the listing

Camden risks throwing away a fantastic opportunity to move with the times and conserve the listed buildings, adopting alternative green options that abandon the antiquated "*central boiler + miles of heating pipes*" concept. **This application throws away that opportunity forever with no way back**, leaving the estate lumbered permanently with yesterday's engineering and with its architectural integrity wrecked, and the risk that the listing could be downgraded to Grade II or simply removed.

There is no way in which this application could be approved "with conditions". It is fundamentally the wrong system. Therefore I urge that this application be **REFUSED**.

This submission is dated Saturday, 27 January 2024. Further, more detailed comments may follow.

Thomas Muirhead