LETTER OF OBJECTION to Planning Application 2023/5338/P and Listed Building Consent 2024/0091/L.

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.'

We wish to lodge **OBJECTIONS** to the application on the following grounds.

1.0 PLANNING PROCESS

1.1 The application is categorised as 'Residential Minor Alterations'. This cannot possibly be correct or justified.

Minor alterations are usually limited to insignificant and virtually invisible adjustments to a single dwelling NOT a strategic change to a district heating network that applies to 520 Grade 2* dwellings!

Furthermore, the alterations are not in any way minor, as explained by the application. They result in appreciable external alterations to iconic architectural features of the listed building and a fundamental change to the thermal design and performance of the structure raising the possibility of creating mould and damp within all 520 homes.

1.2 This application seeks permission for the installation of the HIUs within homes. To install the HIUs in the locations shown, much of the listed interiors will be disturbed with wardrobes/cupboards needing to be removed and replaced. No details are given, yet permission is sought to install the HIUs. This application needs to be supplemented by detailed drawings before approval is given. As noted elsewhere, there is no record of where original listed details are extant and a record needs to be made before work begins. In addition, detail of the walls and surfaces that pipework will need to be attached needs to be given.

1.3 It is not acceptable that this application should be separated from a later application for the consequential alterations to the interiors that will result from the changes to heating and hot water system. Therefore this application should be combined with 2024/0286/L.

1.4 The application includes inaccurate statements and makes overextended and unsubstantiated claims. Why are such incorrect statements included within the report? Is it to hide the extent of the work and the damage it will cause to the dwellings?

Surely unsubstantiated evidence should not be accepted as the basis on which the application should be determined.

The following are typical instances of inaccuracy and exaggeration, but they are not the only ones.

a) *'All new horizontal and vertical visible service pipework will be installed either within a galvanised housing or exposed with suitable insulation finish to protect from freezing and sit sympathetically alongside existing adjacent building fabric'. p 38*

This statement means nothing. How a galvanised or coloured metal aluminium circular pipe housing might be sympathetic to the fine concrete finish is not obvious!

b) '*The proposed new system is designed to accomodate low carbon technologies in the future*'. *p.16*

The application does not demonstrate how this is achieved. We note below how most of the roofs are being left in state that will hamper installation of future technologies.

c) To say that new services '*will follow existing routes*' is a false claim.

For example, in the large block A (67% of the flats within Rowley Way) the distribution pipework currently runs internally to each flat via a service duct in every alternate party wall. The proposed route for the new distribution pipework is all external, located on every other structural fin and unique architectural feature of the north side of block A.

Not only an incorrect statement but proposal that will damage the architectural merit of this grade 2* listed building. Why make such a statement if it is not really true? See item 2b.

d) The application description states the '*removal of redundant pipework*' which again is not true.

In Block A (which houses 67% of the flats) and is the largest block, the redundant pipework on the roof is due to be left in place. Why state that it will be removed if pipework serving the largest block is planned to be left? It is not a minor matter as the photographs below from the application illustrate.

Mechanical pipes located on roof of block A

Roof mount located on Block A roof

g) The claim that there will be '*lower maintenance'* is unsubstantiated and not explained. Superficially it would appear unlikely and if being used to justify the proposal it should be fully and carefully examined.

Taking into account the following:

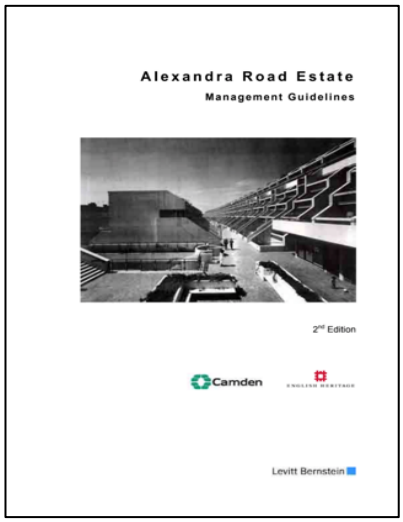
a) existing boilers remain so the maintenance will be same as now.
b) extent of proposed distribution pipework similar so similar maintenance required.
c) 520no HIUs in flats will require at least one annual visit every year. (Note HIUs have a limited life span, shorter than that of the boilers.) At the moment few visits required to individual properties as they contain no equipment.
MUCH higher maintenance required.
d) 11no new massive cold-water booster tanks, pumps and enclosures are proposed, all needing maintenance
Additional maintenance required.
e) the redundant external pipework *will* need to be maintained to stop it rusting and staining the building and stop the pipe cladding becoming a safety hazard as it falls apart.
Additional maintenance required.

f) More of the proposed distribution pipe work will run externally and much of it will be in difficult to access locations for maintenance. All pipework, especially the exposed horizontal runs will need maintenance and cleaning from bird faecal matter to stop damage and degradation of the pipework. **MUCH higher maintenance required.**

2.0 DAMAGE TO HERITAGE

2.1 Rowley Way is Grade 2* listed building. It is one of the most important 20th century examples of post war council (social) housing for rent in this country. *Only 5% of Grade 2 listings are of the quality that warrant the additional * rating.* Rowley Way is an exemplar in so many ways including the **desire by both Camden and their architects and engineers to ensure that all the residents would benefit from low-cost heating and hot water and live in damp and mould free homes.** They were not ignorant about building physics, and attitudes to insulation were very different at that time. That is the legacy we have to work with.

2.2 Questions should be asked why **The Alexandra Road Estate - Management Guidelines** produced by Levitt Bernstein and KM Heritage, signed off by Camden and English Heritage has NOT been referred to in the application.



The careful and detailed 64-page report states in Part 1.03.3 that '*The Guidelines are essentially a **Conservation Manual.'***

However, no reference is made to this document, which amongst many pertinent items specifically mentions keeping external pipework and ducting to a minimum.

How can an application be made ignoring such advice?

In the current British Standard 7913:2013 - 'Guide to the conservation of historic buildings' section 7.2.4 states the following:

'As an aid to the proper care of any building, particularly a large and/or complex historic building, a conservation manual should be prepared. This should be a permanent and accessible document containing essential information on the building, guidance on appropriate maintenance, management and housekeeping procedures, essential health and safety information and reference to the constraints to which any proposed work may be subject'.

It is necessary to ask why the applicants are not following this advice?

The Design and Access statement submitted as part of the application on page 59 also states:

'*The renewal and addition of services should be undertaken in a fashion that does not harm the special architectural and historic interest of the listed building.'*

The applicants are obviously aware of the advice but utterly fail to apply it. On these grounds alone we contend the application fails and seek for it be refused.

2.3 In short Rowley Way is unique and demands that exceptional care be taken to renovate it for a sustainable future.
The following are typical instances where the application fails to protect the heritage, but they are not the only ones:

a) This application seeks to **change the existing provision of a minimum temperature to unmonitored intermittent heating**.

We are all too aware of the health issues arising in homes with damp and mould and we would argue that the original thermal design principles must not be discarded, and the planners need to take this heritage factor into consideration. Without continual low-level heating to the structure the long-term existence of the estate is threatened.

To preserve the building and its heritage a different strategy is needed; one that uses green technology to provide low (running) cost background heating for the whole building. Ultimately this is likely to save the homes and save money.

The current proposal is more likely to lead to the opposite as Awaab's Law will rightly force social landlords to fix damp and mould within strict time limits. Currently there is no damp and mould at Rowley Way. The question that has be asked is why propose a heating strategy that will inevitably lead to both damp and mould that will incur prohibitive costs to remedy retrospectively.

b) Not only will the heritage of Rowley Way be physically damaged by the proposal but the whole vision for a thriving supportive neighbourhood will be lost.

One of the fundamental drivers of the existing design was that the building should **incorporate a form of heating which would avoid the likelihood of condensation in dwellings.** This is fundamental to both conserving the building and for the continual wellbeing of all the residents and maintain dwellings free from damp and mould.

The warm wall strategy removed the risk of damp and mould for everyone. Individual controls were not provided to benefit everyone – it was not the result of ignorance or penny pinching.

From a heritage aspect, the protection of the health of both the residents' and the building fabric by maintaining a temperature that avoided condensation and mould by ensuring a **minimum temperature through October to April** is a unique feature of Rowley Way.

The principle is part of the heritage and should be respected and developed using new greener technologies now available and not swept away by a rush to individual control with the loss of universal benefit.

c) The heated walls drove the simplicity of internal layouts and gave the flats their unique uncluttered appearance.

Surely this is a material consideration in both planning and listed building consent terms?

d) **Block A – north elevation**

This is the iconic view, that thousands of people enjoy every day.

The damage to the north elevation will be considerable.

Why hasn't a CGI been produced from this vantage point?

The stadium like, concrete structure set out tangentially to a gentle curve, cradling the Block A flats above the railway line is unique. A constant rhythm along this 400-metre façade is created by the articulation of identical structural concrete fins running the entire length.

This unique harmonious composition will be totally destroyed by the proposed external silver distribution heating pipe work.

e) The application proposes that the new distribution pipe work will run vertically up **every other** concrete fin. This pipework will then be covered with bright aluminium casings destroying the homogenous architectural feature and the rhythm of this facade.

This is clearly shown by the technical drawings and CGI illustrations submitted in the application showing the unsightly pipe work somehow bathed in sunlight on a north elevation whereas it is more likely to be covered in pigeon poo.

The illustrations are misleading as they only show a view from the low-level service road. The angle of view also masks the awkward disfiguring set back at the top floor which will have a huge visual impact when seen from the public realm.

The elevation will be radically and irreversibly altered, and heritage destroyed.

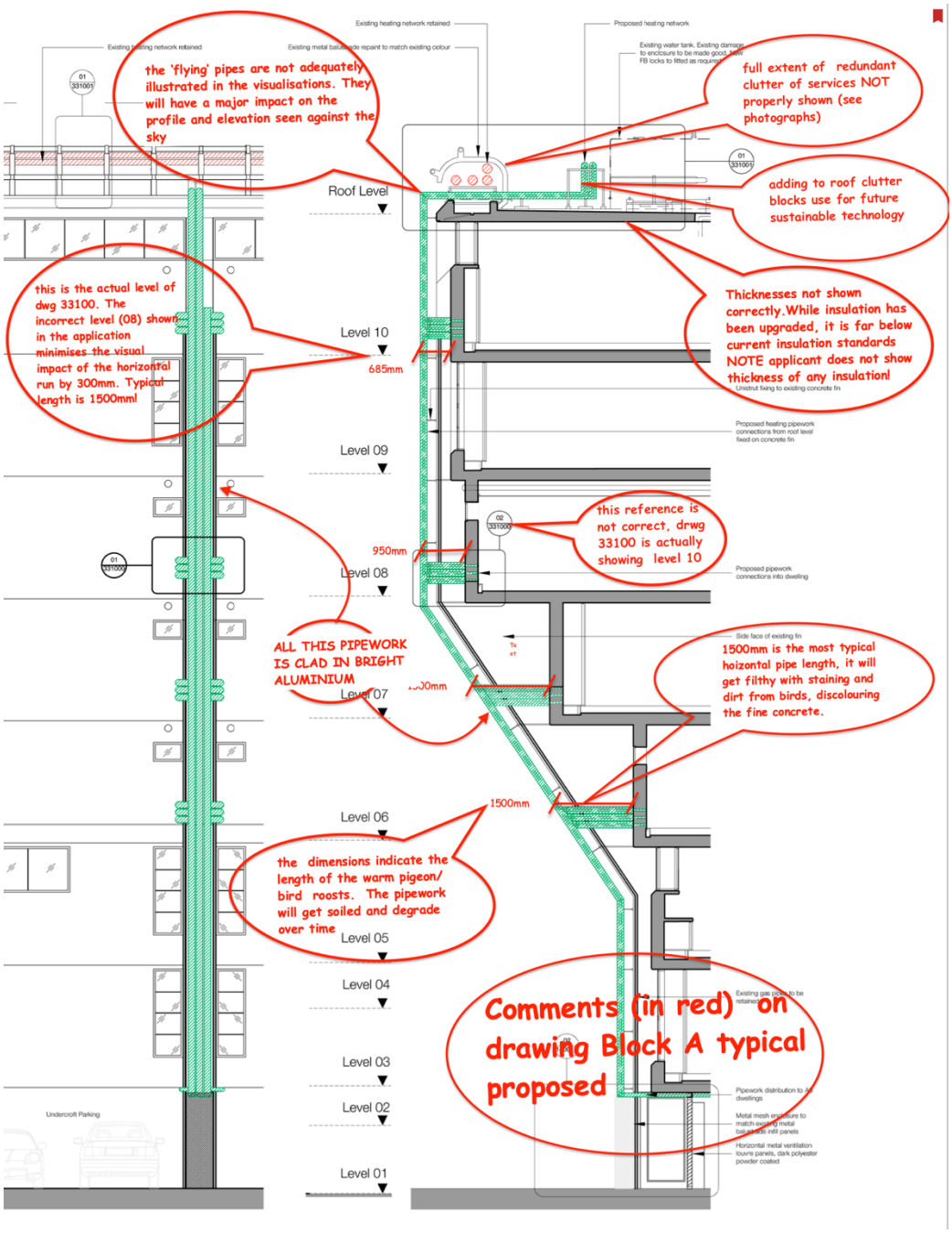
Photo of the existing concrete fins from report

Photo of concrete fins with the new proposed pipework from the report.

f) **Block A- drawing from application of the proposed distribution pipework**

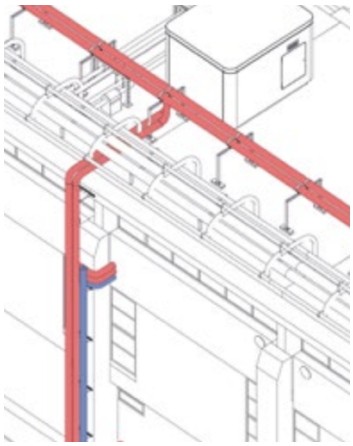
This is marked up with comments to highlight how visually intrusive the pipework will be on the north elevation as the drawings generally do not portray this adequately. For example:

- the number of pipes will make be very unsightly
- the insulation will increase their size and bulk
- the distance the pipes are off the face of the fins will make them perfect pigeon and seagull roosts
- at roof level the 'flying pipes' from every other fin to the roof will be visually very instrusive against the skyline
- all of which are minimsed in the report
- aluminium casings to pipes do not look like concrete!



g)

These are the only 3D views of the 'flying pipes' crossing over the edge of the roof on Block A. The CGI (cropped from image below is low resolution) and taken from a bird's eye view. Viewed from Abbey Road at eye level, this will be very noticeable.



h) The applicant's Technical Report (in fig 3.6) shows that the existing pipework to Block A is 'externally visible'. However, while this is literally true in that the pipe work is visible at low level to someone walking under the building in the car parking area or on the roof! This shown in the report in figure 3.9. Claiming it is visible underemphasises and misrepresents the changes proposed. This is disingenuous.

h) **Infestation by birds/rodents**

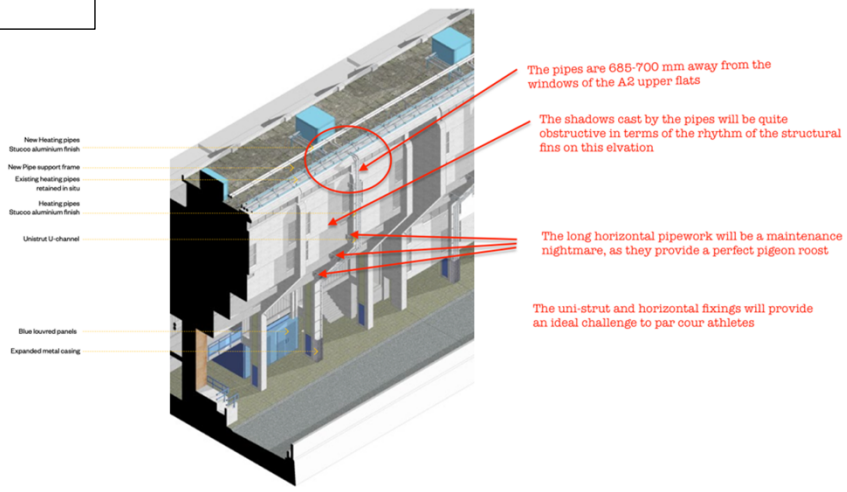
Given the size and location of the horizontal warm pipework it will get colonised by nesting birds. The Block A situation will be much messier as there are three stacked horizontal pipes so the additional maintenance on-costs and detriment to the heritage and damage to this elevation will be greater.

Even without the droppings etc of birds /rodents, it is likely that many of the surfaces will turn green on the north facing elevation as damp sets in.

i)

8.3 Proposed Materials - Typical

This low resolution drawing starts to illustrate the visual destruction of the iconic elevation facing the railway



j) **Bizarre decisions and statements.**

A number of aesthetic judgements and statements within the applications seem based on wishful thinking rather than a rational appreciation of the changes being proposed.

- The decision for all the pipework on the north of block A to be run as individual pipes and justified on the grounds of a conservation preference is odd. It will also be costly and be a maintenance challenge.
- The subsequent idea that if the pipes are then clad in grey coloured, aluminium weatherproof casings they will appear as similar to the concrete is riseable!
- The heritage will be damaged by the redundant distribution pipework not being removed. Being redundant it is unlikely to be maintained and therefore will rust and rot. The pipework casing is not suitable for conventional painting, it will be very expensive to maintain. (see photos in item 1.4d)
- All the existing cold-water supplies are being re-positioned on the outside of block A and B in exposed positions across the roofs which require careful insulation. This decision will also cause problems to any future roof repairs or insulation improvements.

Such 'overclaims' and ‘short sighted solutions’ by the applicant sound extremely dubious when used to support a proposal to deface the building.

i) **Block B – West elevation**
The proposal is to run pipework up the flanks of the block B type flats. The first block B forms the main end elevation and entrance to Rowley Way from Abbey Road. Surely this is a heritage elevation and should not be covered with distribution pipework for the heating network?

The application does not deal adequately explain why reusing internal routes was rejected (see also item 3.1 below). For both visual heritage reasons and to minimise heat loss it would appear to be a much better solution.

k) **Heritage Record for Rowley Way.**
Despite the Grade 2* listing a full record is not kept by Camden of each flat and the common parts despite their own Management Guidelines. This becomes very apparent in the detail of the planning application where many fundamental aspects of the flats are simply not known with any certainty. (e.g. hot water cylinders, which sliding doors remain, status of the listed wardrobes/cupboards that will need to be destroyed to install the HIUs) so consultants are relying on limited and incomplete information. Without a full and proper record of the historic asset, how will the works be monitored for compliance or indeed how will contractors calculate the cost to carry out the work properly?

l) There are many drawings in the submission that are not relevant and should be removed as they are not the subject of this planning application and could 'accidentally be approved'. eg drawing of a new internal pipe route behind a new skirting ref 3547-RW-M-605.

3.0 A LOST OPPORTUNITY FOR AN OPTIMAL GREEN SOLUTION

A questionable solution for the future?

3.1 The application reassures us that the proposals aim to use the existing routes. But as highlighted in item 1.6 c) above they **do not**. They propose creating new surface mounted routes generally externally but also internally.

Firstly – why state this it if is not the case? Is this to create the impression of less damage occurring due to the works?

Secondly - why not reuse existing ducts?

All existing internal ducts will need to be opened up and accessed as the report states that all the flats are to have fire stopping installed at floor level. The damage and upheaval to the residents caused by installing the new distribution routes is not likely to be significantly less than reusing internal purpose made service ducts leading directly to each flat. This

project is not some Victorian house which was never provided with service routes as part of its original features.

This appears to be a solution of dubious technical merit.

3.2 The application claims that the scheme has been designed with an element of future proofing that will enable the installation of technology such as air source heat pumps when the existing boilers fail.

However as new green technology will likely supply low flow temperatures, the surface areas of emitters will need to be much larger than those needed for this submission. The surface areas of radiators (to be specified in a future planning application) will be sized for the existing boilers which supply water at much higher temperatures than will be needed in the future. It is unlikely that the existing boilers can be re-configured to supply heating water at a lower temperature. These questions need to be answered now.

This appears to be a solution of dubious technical merit.

3.3 The application's Technical Report on page 40 states *'it is hoped that possible future improvements to the glazing and fabric would reduce the scale of new heating emitters*.'

- How can this be just a 'hope'! Surely It is fundamental to the sizing of pipes, supply temperatures of the water etc.
- How can the design be so incomplete at this stage? For planning consent a full knowledge of the final design is needed.
- The application is far from complete, with crucial information missing, as noted below.

3.4. **0ver 600m of south facing roofs not used for any solar technology!**

The application states on page 43: *'To minimise the potential damage to the existing building fabric, it is proposed to leave redundant pipework in place on the block A roofs'.*

Not only is this unique asset being overlooked but it will obstruct any opportunity in the future.

Surely this is not sensible and not the way to preparing for the future and appears to be a solution of dubious technical merit.

a) The ability to use the roof spaces for future sustainable energy interventions will be more difficult and more expensive.
b) The ability to repair and maintain the roof will be hampered, more difficult and more expensive.
c) Improving the roof insulation to Block A (and other blocks) to current standards should be a priority. Leaving redundant distribution pipework on the roof, the opportunity to enhance the roof insulation at a reasonable cost will be lost.
d) There are huge downsides to not removing redundant services as they will almost certainly continue to rust and create an unsightly maintenance issue. Their presence will provide obstacles to new services and restrict opportunities for increasing insulation or locating more sustainable equipment on the roof.

Roof mount located on Block A roof

e) The proposed external pipework does not appear to be very highly insulated. The submission refers to the insulation being to protect against frost, not to optimise heat retention. It would be better to keep the pipework internal on all blocks so that residents benefit from heat lost from distribution, rather than all going to heating London.

f) **Insulation**

Why are no improvements proposed to provide or improve insulation in the places where it is possble. Every guide available advocates improving the fabric first.

Surely this is not a sensible approach and not the way to preparing for the future and appears to be a solution of dubious technical merit.

g) **Additional ventilation to flats**

Currently the flats are provided with ventilation outlets powered by shared fans located in the common internal ducts to the bathrooms only. No mention is made of the additional ventilation required to make this scheme work.

Kitchens only have opening windows.

Undoubtedly to avoid the predicted issue of damp and mould, no doubt additional mechanical ventilation will be required and further changes will be sought. The current approach does not seem to have considered the issue fully appears to be a solution of dubious technical merit.

4.0 THERMAL PERFORMANCE - technical capability

4.1 In these days of high energy costs surely it would seem wise to consider the implications of **differential heating** in the properties, and what the consequential costs could be for the residents and the council.

They could be enormous!

Consider the money that will need to be continually spent on dealing with damp because next door can't afford to have the heating on, or the flat is void the time to manage complaints, the time to deal with maintenance issues etc etc!

4.2

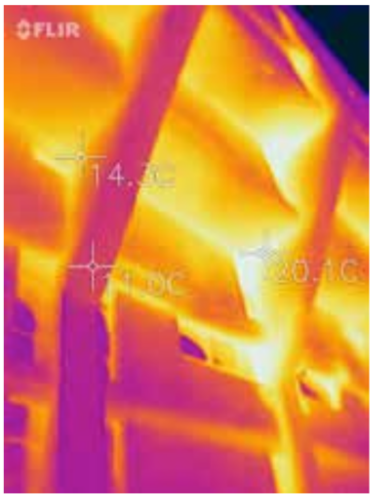


Figure 2 : Rear of block A showing the heated party wall

This thermal image is included within the application.

This shows that heat from the heated walls travels through the fabric effectively keeping the building and the flats dry and warm with NO **mould and damp**.

The application does not propose how this heat should be kept INSIDE the flats and inside the structure. **Why not?**

Why has external insulation to walls and soffits not been considered? Rendered insulation would look much more like concrete than metal pipe casings!

4.3 The current application for intermittently operated radiators won't provide an even spread of heating through the floors or walls; wardrobes are behind most of these

external walls; the structure will become cold and therefore the external walls will get **damp and mould will occur**.

4.4 All the warm soffits are the underside of floors within flats. Currently they get adequate heating across the width of the floors due to constant heat conducted slowly through the concrete, this stops fabric temperature falling below dew-point temperature. It takes a long time for the heat to warm the structure in this way. Intermittent heated radiators will not distribute heat in this way, cold spots and **damp and mould will occur**. This result is predictable.

4.5 With the proposed metered heating some residents will have a heavy price to pay for ineffectively insulated building fabric. Currently the heating costs are divided between all residents in the individual block, based on floor area.
This is also true for flats on the lowest floors, against the earth, and kitchens with external planters and walkways over. Properties under the top roof slab would also benefit from additional insulation.

5.0 SUPPORTING DOCUMENTS ARE NOT SAFE TO INFORM A DECISION

5.1 Why are 15-year-old technical reports being used to justify the technical design solution?

Included as part of this 2024 application, is a report from The National Industrial Fuel Efficiency Service (NFSE) who were commissioned in **2002** to produce a report on the options for heating the estate. The final NFSE recommendations were made in **2009** in the report that forms a substantial part of this 2024 planning submission. Even for consultants with the best technical credentials how can this report possibly be reliable **15 years later?**

Most of the technical solutions available today (ASHP, GSHP, PV technologies and control systems) were not available or not even on the horizon in 2009.

People on the estate have been urging, calling for green, sustainable solutions to be considered for many, many years. This is so disappointing and disheartening that the only body capable of ensuring the long- term sustainable solution for Rowley Way should not be supportive of such a sensible way forward.

5.2 Paradoxically, the NFSE report advised that the option to have individual heat metering should not be pursued. That recommendation to omit the heat meters would at least be in line with the original design intent and protect the heritage of the buildings.

5.4 Information on the existing state of the heating and hot water is fundamental to defining the extent of the work needed. Camden organised a letter drop questionnaire (page 32 of the technical report) ‘due to a lack of detailed survey information about the heating and hot water supply and distribution in homes' rather than gathering the information in a systematic and quantifiable way.

Subsequently 154 responses were received (out of 520) which is slightly less than 30% of residents. The document notes there was much confusion amongst respondents about how their homes were heated. What was the point of the survey and how can it be relied upon?

SUMMARY

6.0 This sub-optimal submission should be refused for ignoring heritage, not considering better, greener, more sustainable solutions in line with current best practice, government guidance and Camden's own green agenda.
We ask that the application is refused.

Gerard and Judith Ryan
- End-