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Sent: 11 February 2024 23:09
To: Elaine Quigley; Planning
Cc: Natalia Malejka
Subject: 2024/0091/L - 23d Rowley Way - comments/objections

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To whom it may concern,

The [gov.uk](https://www.gov.uk) website has gone offline, as such please see our comments to the relevant proposal below;

We wish to make following observations on the Planning Application for the 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.

Climate Emergency

In 2019, Camden declared a climate and ecological emergency and developed a Climate Action Plan 2020-2025, which outlines a programme of projects and activities for the council to help achieve net zero by 2030. The proposal to retain gas as it's primary source of energy, goes against Camden's net-zero carbon goals.

- We see the retrofit of Alexandra & Ainsworth Estate as a potential opportunity for grant funding to assist the decarbonisation, as so many has been made available recently. The Camden itself set up the Camden Climate Fund, which provides up to 50% of costs to reduce the carbon used in our homes, businesses, and community spaces with measures supported including insulation , heat pumps, solar photovoltaic panels and solar thermal systems. Why none of these options are included in the proposal of works?
- Rowley Way is one of the most recognised social housing buildings in the country and attracts swaithes of tourists from across the world. Publications on it are frequently written and it features in many media. This could be a considerable opportunity for Camden Council to push forward an aspiring green example of retrofit or upgrade. We think the current proposal ignores this opportunity.

High-temperature distribution system proposal:

- Whilst we understand the strategic phasing of the upgrades and constraints behind it we think the initial investment into carbon heavy infrastructure for phase 1 is unwanted albeit potentially necessary. This said, we feel the application misses to prove that phase 2 works are possible and we are not locking ourselves into a gas as a primary heat source for another 50 years. We therefore require further understanding on the feasibility of decarbonising the system with heat pumps. Further details as a starting point could include the following;
- Technical details illustrating compatibility with future upgrade to heat pump energy source and which prove current proposal for the flow and return temperatures of the distribution system can be maintained (ie. pipe sizing is compatible, HIUs can be retained etc)
- Cost analysis of heat pump upgrade broken down into estimations of both initial installation costs, and long term energy savings associated viability.

- Currently the building mitigates damp and mould via low consistently heated dwellings utilising mass radiant walls. Any proposed upgrade to system should illustrate how the risk of damp and mould can be mitigated. As such we would expect some detail on the ventilation strategy, and how this may be practically applied across the estate. The strategy should include;
- practical considerations on how tenants realistically use windows and heating systems i.e naive blocking of trickle vents to mitigate heat loss etc.
- In the context of the current energy system and a cost of living/energy crisis, the proposal should also consider the implications dwellers choosing not to turn on heating. Could this give rise damp/mould? We understand control of heating to individual dwellings is important, but question if this risk has been considered.
- We are also concerned about investing into a gas infrastructure in the context of volatile pricing which increased 15 fold between 2020-2022, and since dropped to 5 fold of the 2020 figure with little prospect of dropping further. We feel strongly that the current strategy does not sufficiently consider residents in most need, in the context of the cost of living crisis, where energy price plays a large part. The system proposed and the sizing of the radiators seems to assume residents will have their individual heaters on for most of the day and night (15-18h), which with current prices is unlikely to happen and fuel poverty might be exacerbated and tenants are left in unheated flats.

Replacement of heating/hot water risers to individual dwellings and installation of HIU

Upon declaring a climate emergency in 2019 it is Camden's duty to enact on policies that help it achieve the 2030 net zero carbon goal. The proposal for installation of HIUs in each dwelling following removal of existing hot water cylinder presents opportunity for use of renewable energy sources such as CHP, biomass, solar or heat pumps. If installed as per the Phase 1 proposals, which rely on gas distribution, will the whole system not be obsolete in 6 years time (2030) as the whole country pushes towards zero carbon? Could this be considered as a waste of money both from leaseholders and the public pocket.

Budget and costs

We require a detailed cost analysis of the capital and operational costs of the heating proposals of the estimate £14,700,000.00 for the main contract and the £800,000.00 for electrical works. Camden's "Heating Policy states that Camden will; "Undertake "whole life cost" option appraisal when considering improvements to whole block heating. The selected option will be determined by the least negative Net Present Value (NPV). Where the NPV of one or more options are within 5% of the lowest option, the recommendation shall be determined using economic, social and environmental impact assessment." We note that the latest report on the NPV, submitted for Planning and Listed Building Consent in 2023 (The NIFES Consulting report) was written in 2009 and quotes figures and charges from 2007/2008. This is unacceptable in light of the levels of inflation experienced in the last 15 years and increases in energy costs and therefore the lifetime costs.

Consultation with residents

We feel having reviewed all documentation (some of which have not been submitted as part of this application) that a thorough study with numerous options has been undertaken. This said as noted above, information has been poorly relayed back to residents within the estate, particularly those without internet access.

The reports reference consultation with residents, however no formal report outlining all comments made during the pilot projects, and people's concerns regarding works are not documented. A missed opportunity here during a consultation period was not displaying any of the proposals at the tenant's hall for all to see and understand. As new residents to the estate we found it very surprising how little cohesive information long-standing tenants had been given and how few were aware of the disruption the works will cause to their homes. We appreciate there were pilot projects to help residents understand the impacts on their homes, however the flat types chosen did not extend to the most common type of a flat on the estate - the 1-bed, which will also be the one most spatially impacted. We think a more engaging, thorough

presentation and consultation process could help tenants understand current and future positions and bring them with Camden on the much needed retrofit journey.

Zero Carbon report

The documents submitted to the portal reference the Zero Carbon a number of times and quote it as an explanation for the choice of the system and its long term adequacy. The report itself however is missing from the planning portal and therefore we deem the information submitted as incomplete.

Procurement route, Tendering and Phasing

Whilst we are aware that on most projects information regarding procurement route and tendering wouldn't normally be part of the planning application, we would like to stress and highlight the importance of careful consideration regarding this. A Grade 2* listing means that under the listed building legislation contractors will not be able to make minor amendments without seeking new planning permissions and listed building consents. If not procured using an appropriate contract which provides Camden with control over specification and quality of the works, there is a risk to programme, lack of continuity and unfinished/ abortive works which we would like to be assured is being considered.

On the basis of the above comments, we object to the works until more detail and meaningful consultation on the systems is provided, with detailed up-to date lifetime cost analysis (capital costs and operational costs) and renewable and architectural/ listed building concerns.

We are looking forward to seeing this progress in detail further.

Kind regards

Natalia Malejka and Ashley Tosh