

**Planning Application
2024/0091/L**

Dear Camden,

OBJECTION – I strongly encourage the rejection of this application.

I am a resident of the Alexandra and Ainsworth estate and I reject the proposal and demand it is refused.

For context the applications Camden are making are independent but effectively require collective approval. The distribution pipe work in 2024/0091/L and 2023/5338/0 is intended to be connected to the HIUs and radiators set out in 2023/5339/P and 2024/0286/L. The works set out are separate parts to a single proposed system. As such my comments on this application 2024/0091/L reference the other planning submissions. For clarity these are listed below.

- 2024/0091/L (Listed Building Consent) – For distribution pipework and plant.
- 2023/5338/0 – For distribution pipework and plant.
- 2023/5339/P – Replacement of existing glazing for double glazing.
- 2024/0286/L (Listed Building Consent) – Replacement of existing glazing for double glazing, removal of domestic hot water cylinders for HIUs and radiators.

Below are the considerable concerns I have with the proposal. When reviewed collectively the Camden proposal could be catastrophic to Camden in terms of operational costs, capital costs, increased maintenance. The proposal is likely to have a harmful impact on the residents with repeat retrofit works to address the ill-considered proposal, inadequate heating, overheating in summer and increased humidity and mould issues.

- **Listed Building Impact:** Camden are proposing to install pipework on the external walls. The estate is a Grade II* listed building with significant historical significance. This external pipework will cause extensive and irreversible harm to the design intent of the architect Neave Brown. It will impact the juggernaut design and the clear face of the concrete. If Camden intend to replace the pipework this should only be allowed if there is no surface mounted pipes and cables. An alternative solution remains for a decentralised system (e.g. Air Source Heat Pump). This would be simpler on an estate of this size and layout and would not require the distribution pipework set out in this planning application. This would be cheaper, more sustainable, lower cost in operation and create a full warranted heated system that isn't reliant of failing boilers.
- **Reliance on Outdated Information:** Camden's heating technical report is dated Feb 2020 and relied upon information from 2003-2006 (Section 6.2), 2007/2008 (11.62), 2009 (Appendix B – NIFES Heating Options Appraisal), 2010/2011 (12.1 expected system install date). Camden's comparison and assessment uses gas prices that have increased some 15 times since the report was written, similarly with electricity prices. Capital costs are based on 2007 and 2008 figures for works to take place in 2010/2011. This information is outdated and cannot be relied upon for appraising options and recommending a heating proposal. Camden's proposal should be rejected on the basis it has an outdated assessment which recommends an outdated solution the problems of which our outlined herein.

Further excerpts that justify this point:

'The expected running costs due to gas and electrical consumption has been factored into the net present value costs assuming gas price annual inflation rate of 3%'. This is based on 2010 prices of construction, gas and electricity.

'The aim of the report is to: Carry out an options appraisal providing net present value costs over a 30-year period based on capital cost, repair, maintenance and fuel costs.' The options appraisal appraises options from 2010. Heating and low carbon technologies have significantly progressed since 2010. The boilers have also aged significantly, which the recommendation is reliant upon.

'Make a recommendation as to which option should provide the best long-term benefits.' This conclusion would undoubtedly change if undertaken now.

- **Boilers:** The heating proposal relies on the upkeep of the existing boilers to serve the estate. The boilers have failed on numerous occasions in January 2024 alone resulting in no heating and hot water to the estate. The council should not be investing circa £15m(?) in pipework linked to boilers which cannot be warranted and therefore cannot be relied upon.
- **Phase 2 Works:** By installing the pipework Camden are severely limited with the long-term solution which has not been detailed, costed and presented to the residents. This is due to pipe diameter, radiator sizes and the maintenance of a centralised system. By approving this proposal, you are approving the long-term solution. This application should be invalidated on this basis.
- **Leaseholder Costs:** During a costs of living crisis leaseholders are potentially being charged £30k(?) for these works with no reliance on a heat source. If this does break this could cost a further £10-15k(?) per leaseholder with additional 'unforeseen' costs to the council. Camden have since confirmed they are designing a ventilation solution. This has not been designed not costed but would be a further cost to the above £40-45k(?). This is unaffordable for leaseholders, and I expect the full costs of the proposal and the implication of the uncoordinated design have not been budgeted by the council. Leaseholders are being forced to pay these sums for an outdated design.

Due to there being no renewable or low carbon technologies Camden are limited to grant funding. Further exacerbating the issue for leaseholders and Camden council.

- **Sustainability:** Using the existing boilers carries the highest carbon cost in operation. This therefore does not meet Camden's own energy targets. The proposed option to maintain a centralised system has the highest embodied carbon costs. Again, a decentralised Air Source Heat Pump solution would be cheaper to install (when factoring the replacement of the boilers) and have less embodied and operational carbon. This has not been evaluated based on modern technologies and current costings hence the incorrect conclusion by Camden.
- **Inadequate Heating:** The proposed heating strategy is likely to lead to significant increases in (charged) heating costs for the Tenants together with smaller radiators which, as a resident, do not believe will adequately replace the heat emitted by the (whole wall) heating system currently in place. The council do not appear to have undertaken air tests to measure air and subsequent heat loss. As such I expect the homes to be inadequately heating.

- **Cold & Mould:** The likely creation of unaffordable heating together with the inadequate heat emission for our homes is likely to lead to colder temperatures. Our homes have no active ventilation. The residents have raised concerns regarding mould growth to Camden on many occasions however these have gone unanswered. Camden confirmed on 7 February 2023 that 'Our team, alongside our consultants, is currently developing a comprehensive ventilation strategy to accompany the new heating system. This strategy is aimed at addressing and mitigating any risks of condensation and mould. We recognize the importance of ensuring that the new system not only enhances energy efficiency but also maintains the integrity and comfort of residents' homes.' This confirms that the Council are now aware of the increased potential for mould growth. However, this is not referenced at all in the existing planning applications. **You cannot design heating, insulation and ventilation separately. You cannot install heating, insulation and ventilation in sequence without consequence.** Why is Camden proposing to proceed with a heating system when the ventilation (and overheating which has not been responded to) has not been reviewed, it has not been designed and it certainly has not been costed. This should not be presented to the Council and to the residents of this estate in such an uncoordinated manner. The real likelihood of mould poses such a significant threat, and at a time when Camden is under investigation by the housing ombudsman in relation to mould.
- **Heating Coils:** Camden have regularly stated the heating coils are not working and cannot be connected to. This is not what is stated in the Heating Technical Report section 5.4. 'The site inspection highlighted the problems on the network and access issues, but it did not conclude whether the heating coils could be retained and reconnected to.' Camden assessment has not been thorough and the majority of the heating coils do work and could be maintained. Granted this would still require a new distribution network. The suggestion to pursue a decentralised system as the solution to this estate also remains.

Closing remarks

Camden should not be granted permission to install pipework and cables on the external elevations of our Grade II* listed estate.

Camden should not be design heating, insulation and ventilation separately.

Camden cannot install heating, insulation and ventilation in sequence without consequence.

These are our homes and Camden's proposal aims to force an outdated, unsustainable and uncoordinated system on us. Camden need to reassess and provide a comprehensive strategy assessing the heating, heat loss, install cost, operational cost, impact on heritage, air permeability, overheating, ventilation, sustainability, impact on residents, ALL, TOGETHER using modern heating options.

As such I reject the proposal in full and strongly encourage the application is refused.

Harry Charalambous

Alexandra and Ainsworth Estate Resident