



Ms Elaine Quigley  
London Borough of Camden  
Development Management  
Town Hall  
Judd Street  
London  
WC1H 9JE

Direct Dial: 0207 973 3777

Our ref: L01571007

7 February 2024

Dear Ms Quigley

### **Arrangements for Handling Heritage Applications Direction 2021**

### **Authorisation to Determine an Application for Listed Building Consent as Seen Fit**

### **ALEXANDRA ROAD ESTATE ROWLEY WAY LONDON NW8 0SN Application No 2024/0091/L**

Applicant:	Camden Council
Grade of building(s):	II*
Proposed works:	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.
Drawing numbers:	Drawings as approved

Date of application:	8 December 2023
Date of referral by Council:	10 January 2024
Date received by Historic England:	10 January 2024
Date referred to DLUHC:	

You are hereby authorised to determine the application for listed building consent referred to above as you think fit.



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Telephone 020 7973 3700  
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Historic England

Yours sincerely

*Officials have considered the information provided above on behalf of the Secretary of State, and do not intend to require the application concerned to be referred*

*Signed Lorraine Gamble*

*Date 13/02/2024*

**Claire Brady**

Inspector of Historic Buildings and Areas

E-mail: [claire.brady@HistoricEngland.org.uk](mailto:claire.brady@HistoricEngland.org.uk)

NB: This authorisation is not valid unless it has been appropriately endorsed by the Secretary of State.



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**Arrangements for Handling Heritage Applications Direction 2021  
& T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**ALEXANDRA ROAD ESTATE ROWLEY WAY LONDON NW8 0SN  
Application Nos 2024/0091/L & 2024/2086/L & 2023/5338/P & 2023/5339/P**

Thank you for your letters of 10 January 2024 regarding the above applications for listed building consent and planning permission made by your authority. On the basis of the information available to date, we offer the following advice to assist you in determining the applications.

**Historic England Advice**

**Summary**

Alexandra Road Estate is one of the best examples of innovative social housing from the 1970s. The estate is particularly noted for its high-quality, high-density housing that is particularly characterised by the use of external concrete and render to create sculptural forms.

The proposed works focus on improving climatic conditions within the residential units across the estate and reducing heat loss. The works include thermal upgrading of existing timber framed windows and replacement of heating infrastructure. We consider that any harm to the significance of the estate would be minimal and should be weighed against the likely positive contribution to mitigating climate change.

**Historic England Advice**

**Significance of Alexandra Road Estate**

The Alexandra Road Estate was designed in 1968 and built between 1972 and 1978



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by the London Borough of Camden Architects Department, led by Neave Brown. It is one of the most ambitious examples of innovative social housing from this time and created high-density housing at a low scale, in contrast to the high-rise developments that had become popular in the previous decade.

The estate was inspired by the pattern of the surrounding traditional London streets and comprises blocks of flats and terrace houses laid out along a series of long north-south pedestrian walkways and gardens.

The emphasis of the design was to provide good quality living standards and to maximise accessible external space. The design incorporated large communal gardens, whilst each residential unit had access to a private balcony or garden where overlooking was minimised using planters and surrounding walls. The residential interiors, whilst small, were laid out to maximise flexibility and use of the space with flexible partitioning and integrated servicing. Living accommodation was placed where it could have the best outlook and was often addressed by large timber-framed windows and doors that enabled light to flood into the rooms.

In terms of architecture, the blocks surrounding Rowley Way are particularly noted for their use of concrete, which has a distinctive board-marked timber surface patterning, and for their stepped and sloped sculptural profiles (Blocks A and B), which are emphasised through projecting party and parapet walls that help to create rhythm, uniformity and drama in views. The north elevation of Block A is particularly distinguished by its cantilevered stepped profile, distinctive projecting concrete fins and fortress-like appearance, with the minimisation of windows in order to counter noise from the adjacent railway line.

In recognition of the national heritage significance of the estate, it was listed at Grade II\* in 1993.

### Impact of the proposals

The proposals include works focused on improving climatic conditions within the residential units across the estate and reducing heat loss, and have been submitted for consideration under two listed building consent applications, as follows:

1. Thermal upgrade to existing timber framed windows, plywood ventilation panels and external timber doors (application 2024/0286/L)

The proposals include renewing seals to windows and doors, insulating the existing plywood ventilation panels and replacement of the single glazing within existing timber-framed windows with vacuum double glazing.





The existing timber-framed windows, doors and plywood ventilation panels form a large proportion of the external elevations to the residential units and therefore represent a significant opportunity to secure thermal enhancement.

The proposals also include general works to prolong the life of the existing timber window frames and ease the operation of the windows, undertake works of redecoration, repair, and replacement of broken or missing ironmongery on a like for like basis. In the case of the ground floor flats in Block A, the proposals include the replacement of the louvred glass openings with a top hung window on a winder opening.

In terms of impact, the proposed vacuum double glazing is thinner than the existing single glazing. As such, the glazing can easily be accommodated easily within the depth of the existing timber frames and the original external aluminium beading can be reinstated in its existing location. The glass itself appears similar to the original, with the addition of small suction dots in the corners and tiny spacer dots throughout.

The resulting impact on the appearance of the glazing is likely to be negligible. The other general works to prolong the life of the timber frames are likely to enhance the appearance of the windows, which are in general need of redecoration and refurbishment.

## 2. Replacement of heating infrastructure and other works to plant areas (application 2024/0091/L)

We understand that the existing boilers were replaced in recent years. However, the main distribution pipes across the estate have not been renewed and are now in need of replacement, similarly other associated plant areas and water storage spaces are in need of upgrade. The proposed works were granted listed building consent and planning permission on 17 November 2020 (relevant references 2020/1450/P and 2020/2723/L).

The current application now proposes minor changes to those proposals, i.e. changes to exact positioning of pipework.

These changes are considered to have a low impact on the architectural significance of the affected areas, which are adjacent to existing service areas, or have limited public visibility.

The most significant changes relate to the method of heat distribution within the residential flats, as set out below:





3. Replacement heat distribution within the residential flats (application 2024/0286/L)

The existing main distribution pipes enter the residential blocks at a low level and connect to building heating pipes (known as coils) that are embedded within the vertical party walls between the residential units. Heat is then distributed to the residential units via radiant party walls.

Whilst it is understood that the heating coils themselves may still be serviceable, many of the connection points to the coils are known to be subject to extensive corrosion, meaning that the surrounding concrete would need to be broken out in order to access sound pipework to enable connection to the new distribution pipes. Following trial opening-up works to reveal the connection points to the coils in Block B, it was concluded that this work would not be feasible across the estate, as many of the connection points were in areas that proved very difficult to access, whilst the work itself involved significant noise and disturbance to residents.

In addition, the existing coil system presents several issues (as set out in the application submission):

- A number of coils have failed across the estate. Faults are almost impossible to identify or repair, as the coils are embedded within the concrete.
- There is no form of heat control to individual flats or consistent pressure/temperature across the estate. This means that there is a high degree of variation in internal temperature within the residential units. In some parts of the estate, the flats are very hot and residents often seek to lower the temperature by opening windows, resulting in heat loss. In other areas of the estate, the coil temperature is too low and the heating has had to be supplemented with additional electrical heaters or gas boiler/radiator systems.
- The warming of the walls has the potential to create heat loss, particularly through the fins and party walls.

It is therefore clear that the existing coils present serious difficulties and inefficiencies and that there is a strong case for renewal of the heating system.

The application proposals are to install heat interchange units (HIUs) into each residential unit (also covered under application reference 2024/0091/L). These units would be similar in size to combination boilers and would enable residents to manage their own heat and hot water supply. In most cases, the HIUs would be installed within existing wardrobe or cupboard spaces in the place of redundant water tanks, which





would be removed.

The HIUs would connect to a network of new pipes and radiators that would follow a fairly standard layout to each flat type. Most pipework would be installed within void spaces or behind adapted skirting boards that would appear similar to the existing. The radiators are of a simple vertical rectangular design and have been positioned, where possible to still enable furniture to be placed within the affected rooms and retain a sense of original proportions.

We note that all new pipework and equipment has been sized to accommodate the potential future replacement of the gas-fired boilers with heat-pumps in order to increase efficiency and reduce carbon emissions across the estate.

Overall, the proposed new heating systems are considered to have a low impact on the architectural significance of the interiors of the residential units. Furthermore, the works would be largely reversible, therefore they would not prejudice the installation of new technologies as they evolve in the future, while minimising impact on historic fabric.

### **Law and Policy**

The protection afforded to Alexandra Road Estate as a group of listed buildings rests on the statutory test provided in the 1990 Planning (Listed Buildings and Conservation Areas) Act. This requires the local planning authority to “have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” when determining applications for planning permission affecting a listed building (1990 Act, s. 66 [1]).

The National Planning Policy Framework (“The Framework” / “NPPF”) provides policies in respect of the conservation of the historic environment and of climate change, all of which serve the environmental objective of the planning system, one of the three objectives through which the purpose of the planning system, which is the achievement of sustainable development, is to be effected (NPPF, 8).

The Framework requires that when considering the impact of proposals on the significance of designated heritage assets, decision-makers should attribute great weight to their conservation; and “the more important the asset, the greater the weight should be” (NPPF, 205).

Consequently, harm to such assets should be minimised, and should require “clear and convincing justification” (NPPF, 201, 206). Justification may take the form of an argument of need or it may lie in the public benefit a proposal would procure, which leads to the balancing exercise, below.



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Harm, if less than substantial, should then be weighed by the decision-maker against public benefits in determining an application (NPPF, 208).

In respect of the climate crisis, the Framework's policies promote reductions in greenhouse gas emissions, minimise vulnerability and improve resilience. These policies should be understood in the light of the Government's target for the United Kingdom to reach net zero carbon by 2050.

The relevant passage of the Framework's policy in respect of the determination of planning applications for renewable energy development (NPPF, 163) reads as follows.

*“When determining planning applications for renewable and low carbon development, local planning authorities should:*

- a) *not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and*
- b) *approve the application if its impacts are (or can be made) acceptable...”*
- c) *in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site, and approve the proposal if its impacts are or can be made acceptable.*

Camden Local Plan 2017 is relevant and contains policies relating to listed buildings, conservation areas and climate change.

### **Position**

Historic England was pleased to be involved in pre-application discussions about these proposals which, following the exploration of a range of options, appear to be well considered.

We acknowledge that the proposals will cause noise and disturbance to residents. However, the proposals seek to address long term issues with heat loss to windows and doors and the provision of heating across the estate. In our view, the proposals that are the subject of these applications are likely to have a minimal impact upon the special architectural and historic interest of the building.

### **Recommendation**

We have no objection to the proposed thermal upgrades or the replacement of the



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heating infrastructure, and consider that the applications meet the requirements of the NPPF.

In determining these applications you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

We would urge your Authority to address the advice set out in this letter, and determine the applications in accordance with national and local planning policy and in consultation with your specialist conservation advice. We have drafted the necessary letter of authorisation for your Authority to determine the listed building consent application as you see fit and have referred this to the National Planning Casework Unit (NPCU) (copy attached). You will be able to issue a formal decision once the NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

**Claire Brady**

Inspector of Historic Buildings and Areas

E-mail: [claire.brady@HistoricEngland.org.uk](mailto:claire.brady@HistoricEngland.org.uk)



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