**Planning Application 2023/5338/P**

New application (Jan 10 2024) - Full Planning Permission

**Site Address: Alexandra Road Estate, 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: This is the largest planning application ever submitted for this Grade 2\* listed estate. These are not “*Residential, Minor Alterations*” they seriously impact the outside and damage the inside of every one of the 520 fats.**

**Objections:**

Mechanical-Proposed Replacement Heating and DOM Water Services pipe /external Block A

Site proposal says removal of redundant pipework. BUT it will be left on Block A Roof. Why? Redundant pipes will rot and deteriorate. These pipes also prevent solar panels being installed.

Block A Temporary and Proposed condition-distribution route elevation 01

The curved wall of A Block is the most recognisable feature of this Iconic estate and one of the reasons for the Grade 2\* Listing. The proposed pipework will ruin the external facade for the entire length of the building. The repeating fins, another significant and recognisable feature of the architecture will be marred by tanking aimed at protecting the lower level from parking and turning vehicles, 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*". Has this been carried out?

Block B - proposed heating distribution route elevation 01

New local distribution pipework to each dwelling will adversely affect the front elevation of the lower maisonettes. The application also proposes large-diameter distribution pipework running vertically up the terminal ends of Block B irreversibly harming the surfaces and visually interrupting the plain end walls.

This is an outmoded and wasteful heating concept. Pumping hot water the length of the estate, wastes approx. 40% of the heat in the process.

**Alexandra Road Estate Heating Infrastructure**

**Design and Access Statement | November 2023 Project Brief 2.0 (Updates in blue from previous document)**

2.1Existing central plant (the boilers) will be retained for the remainder of its expected working life. The proposed new system is designed to accommodate low carbon technologies in the future.

No evidence supports this statement. Camden is not committed in terms of time, costs or system.

Camden has known for decades that the current system would need replacement. So why didn’t they bring their considerable weight and influence to bear to ensure the electricity supply/Network was increased to enable future provision? The current plan is a very expensive Stop Gap. Camden says the upgrade will be revisited when the boilers fail in (15-20 years).

Camden is unable to carry out timely maintenance, servicing, or repairs. The Housing Ombudsman is investigating this plus Camden’s issues with handling Damp, Mould and Complaints. It seems very risky to install a Heating “Upgrade” that relies on the survival of boilers that already break down on almost a weekly basis, need £200k a year spent on them to keep them going, are not under guarantee and describe, in writing, by Gavin Haynes as “N*ot fit for purpose”*.

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.

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.

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.

**What is Camden’s Plan if the boilers do not last 15-20 years?**

The plan means these failing boilers will be attached to the new pipework. (This will result in boiler sludge and silt being transferred to the new pipework. Sludge build up was one of the reasons the HIUs failed so frequently at the Highgate New Town Estate (HNT).

In response to climate change, new approaches are emerging quickly. This retrofit does not improve the current system and means we will be locked into very expensive heating costs for the next 20 years.

Why should residents accept such an “Upgrade”? It also means, since Camden has no control over the heating costs, that residents will be locked into fuel poverty for years. This is irresponsible. The capital cost has also risen £2.3m in a month. Apparently Camden’s budget is only £14m. Camden should seriously consider a greener option now.

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.

**Design and Access Statement: Heating Infrastructure November 2023**

3.2 Block A Existing heating System

Camden comment: It should be noted that currently the risers provide a route for fire spreading between flats which will be addressed as part of the proposed works within dwellings.

Camden never addresses this and always leaves new pipework unsealed at entry and exit points, which provides routes for fires and pests. The Service Cupboards through which most pipework will travel on their way in the flats are in a disgraceful condition, from pests and rodents. They are a considerable Health Risk.

3.4 Current system condition (this includes some description of damage to pipes) as if someone else is responsible. The pipes are completely blocked with sludge and limescale due to lack of maintenance. This situation is likely to continue so damage will appear quickly in the new pipework .

4.0 Consultation p24 - We fundamentally disagree with Camden’s assertion that residents are very happy/ satisfied/ or in agreement with the proposal. The only changes to the proposal that we know have been made were in relation to unworkable elements such as hot skirting boards or plinth heaters. We also do not support Camden’s Appraisal as to which Option is best for this Estate.

We still reject this proposal unanimously

Further consultation with residents relating to the Pilot Flats 26A and 46A was undertaken in 2021/22.

We reject the idea that the pilot flats (which took 10 weeks over six months to complete in an empty flat). will take 10 days in a fully occupied and furnished flat. There was no pilot done for Block C homes on Ainsworth Way. The day of the pilot flat viewing the radiators were leaking and the HIUs were not connected - so we have only acoustic reports to go an and they have been carried out using HIUs that are not in this planning application and the ones that were tested produced over 44dB levels in a closed cupboard. This is above nighttime noise levels. We also asked how the war in Ukraine would affect our heating costs and were told not to worry because Camden buys their gas in advance. In 2022-24 our heating costs rose by over 300%. Prices remain high and well above the ONS. Every resident on this estate is experiencing debt, fuel poverty and hardship, some are suffering ill heath.

The “Consultation” was not meaningful. Camden has never consulted with residents and contrary to the impression given in some of the documents, this application has never been agreed by residents. We are all completely against this proposal and have been for the last decade. Camden did fund a series of workshops with a Max Fordham engineer, who is aware of the problems at HNT and their Retrofit which went badly wrong. The workshop findings were presented in Feb/2023 and ignored. This reflects badly on Camden.

Leaseholders are shocked at Camden’s attitude towards this iconic, London, landmark building;

We are shocked at Camden’s Zero Carbon by-pass; and at Camden’s disregard of residents and their ability to pay huge heating bills.

Camden risks throwing away a fantastic opportunity to reduce the overall cost of the necessary Retrofit as well as reduce their own maintenance and repair costs whilst still conserving the listed buildings.

5.3 Boiler House proposed.

When the existing boilers were installed in 2014 the boiler house was an eyesore then and it still is. It’s absurd to imply that planning permission was needed to address broken down temporary hoarding?

5.7 Sub plant room proposed - the generated image does not show what’s intended.

6.2 Cold Water Storage pipework - ends with a comment that Thames Water has been consulted throughout. BUT not the residents

P43 To minimise the potential damage to the existing building fabric, it is proposed to leave redundant pipework in place on the block A roofs. Abandoned deteriorating pipework presents a risk. The application states *'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 for green infrastructure/technology – over 600m of south facing roofs not be used for solar technology.

7.1 Block A - Dwelling Type A1

Where HIUs have been installed in the two pilot flats (26A and 46A), acoustic testing has been undertaken to ensure that these will not cause nuisance to residents.The HIUs installed in the pilot is not the one in the planning application. The acoustic tests were also carried out during the day. HIU noise “clicking” on and off is described as a light switch switched going on and off (MK light switches register 50/ 60 dB. Night noise should be no more than 30dB)

Alexandra Road Estate: Heating Infrastructure Technical Report | Feb 2020

10.0 Appendices - Appendix B - NIFES Consulting Report p 51 dated 2/6/2009

Some data relating to costs and repairs is from 2003-2007. **The figures are 21 years out of date**.

Camden’s proposal to keep us going until the boilers fail is costed at £15.5m. When the boilers fail works will begin again. Approximate lifespan of an HIU is also 20 years. Two large major works within 20 years of each other. The initial cost is unreasonable given the weakness of the proposal.

Appendix G p107 Preliminary Thermal Analysis - no insulation is proposed

**SUMMARY**

In this planning application

* there is not one mention of how residents, particularly leaseholders will afford the currently cost, which will be exacerbated by ongoing heating costs - our experience is that both will only increase.
* No thought has been given as to how resident will live with the upheaval and Contract Works.
* Lastly there is no explanation of what happens if the boilers do not last 20 years.

Regards

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