

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/5338/P	Gabriela Amaral	19/02/2024 10:21:21	OBJNOT	<p>Objection</p> <p>The proposed new distribution pipe work would severely and irreversibly harm the external appearance of block A and block B</p> <p>This application should therefore be unconditionally refused.</p> <p>I also object to the notion that us residents were consulted in the true sense of the word. Although we were showed the pilot flats, these were viewed in the peak of summer so it was impossible to assess if the proposed upgrades are suitable for a concrete building (very different to a more traditional building where these upgrades could be more suitable). I have raised the above concerns during the pilot flat viewing in June 2022 and did not receive a response since then.</p> <p>I am also still not clear on why cold water tanks are being considered? Please can a rationale for this be shared? Also, the statements about the removal of redundant pipe work are not clear and I couldn't identify these in the drawings.</p> <p>Please respond.</p>
2023/5338/P	Olga Helly	20/02/2024 16:06:09	COMMNT	<p>Planning Application 2023/5338/P (new heating plant and distribution pipework) Proposed works at Alexandra and Ainsworth Estate, Rowley, Way, London NW8</p> <p>I object to the planning applications for the reasons described below</p> <p>I have a serious concern about the reliability and benefits of the proposed heating and hot water system which is similar to that installed at the Whittington Estate several years ago. The problems faced by those residents are well documented and have been widely reported in the press. As such there is no confidence that the proposed system, with huge installation cost attached, is fit for the purpose.</p> <p>The proposed changes would substantially affect the interior (internal pipes and radiators) and the exterior of the estate with adverse impacts. The appearance of the Listed Grade 2* building will be negatively affected. The installation of radiators and internal pipework will compromise the useful space and design of the flats reducing the value of the properties, which will attract an additional hidden cost on top of the direct installation cost. By no means it is a "Residential, Minor Alterations" project. It is a big and costly project that requires a detail cost-benefit analysis and justification.</p> <p>One of the key issues with the existing heating system has been unsatisfactory maintenance, servicing and repairs of the boilers and external pipework. The proposal doesn't address these issues and suggests to combine the new heating installations with the old boiler supply system. What are the assurances that sludge and silt from the boilers are not being transferred to the new pipework causing HIUs failure?</p> <p>Overall, the proposal doesn't appear as a cost-efficient and reliable solution of the existing heating system problems.</p>

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2023/5338/P	Zoë Davenport	20/02/2024 23:32:30	OBJNOT	<p>Planning Application 2023/5338/P New application (January 10 2024) - Full Planning Permission</p> <p>Site Address: Alexandra Road Estate, London NW8 0SN Site Proposal: 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.</p> <p>Development Type: Residential Minor Alterations.</p> <p>Type of comment: OBJECTION</p> <p>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 also damage the inside of every one of the 520 flats.</p> <p>Comments re documents This is a lengthy, application involving 112 documents (none numbered) Dwelling Type A1 Existing - There are no one bed flats numbered J & K</p> <p>Comments re the Proposal and claims made by Camden: The "Upgrade" will reduce running costs by 69% and carbon emissions by 60% - How? There's no evidence The boilers will remain until they fail, an estimated 20 years - they're already failing? The distribution pipework is at risk of catastrophic failure - no maintenance or cleaning during their lifetime Double glazing to prevent some heat loss - but shipped from China, with no attempt to offset the cost Concrete is prone to condensation, damp and mould if not heated evenly Theres no ventilation HIUs and Radiators will replace the heated walls - I the heat level will not be sufficient New Pipework will still carry hot water around the estate - this method loses 40% of heat along the way In 20 years time the HIUs will also be at the end of their life We suspect the boilers may fail much sooner - Camden's reputation for timely repairs is poor The Housing Ombudsman is also investigating Camden's handling of Repairs, Damp/ Mould and Complaints During pilot viewing we were told Camden "buys gas in advance" to keep costs stable In 2022-24 our heating costs rose by over 300%. Prices still well above ONS figures Every resident on this estate is experiencing some form of debt and financial hardship , This proposal is not a fully developed Retrofit designed for this estate - its more of a stop-gap</p> <p>Comments re status: Two of the boilers are failing most weekends, the 3rd hasn't worked in months The system is costing £200,000 per year to keep running and described as "no longer fit for purpose". The boilers are not under guarantee, Why plan works around boilers that could fail earlier than expected. This makes no sense Camden's budget is already overspent; rising £2.3m from £14.2m to £15.5m in a month The cost seems random. The works mostly seem to be for elements that are Camden's Why should Leaseholders pay for frames, pipework that's not been maintained</p>

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Objections:

Block A - Proposed Cold Water Tank Storage Plan P1- New Proposal

This has not been discussed with residents and its a clear change of use from Listed Garage to cold water storage tank

No acoustic results for electric pump noise. The power supply is at risk due to any power cuts.

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

To minimise the potential damage to the existing building fabric, it is proposed to leave redundant pipework in place on A Block roofs. This is disingenuous - Deteriorating pipework causes damage! AND prevents 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 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 projecting fins are another significant feature, which will be marred by tanking aimed at protecting ground level areas from parking and turning vehicles,

The Design and Access Statement (page 44) states "It has been agreed ...this will be 'mocked-up' on a single fin, for review". Was this carried out?

Block B - proposed heating distribution route elevation 01 will be visible on the front elevation of the lower maisonettes. Large-diameter pipework runs vertically on the ends of B Blocks harming the plain walls
Alexandra Road Estate Heating Infrastructure - Design and Access Statement | November 2023 Project Brief 2.0 (Camden update in blue)

2.1- The boilers will be retained for their expected working life. The proposed new system is designed to accommodate low carbon technologies in the future. No evidence supports this statement.

Design and Access Statement: Heating Infrastructure November 2023

3.2 Block A Existing heating System

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 seals the gaps around entry and exit pipework. These gaps also provide pest entry points. The Service Cupboards (through which most pipework will travel) pose a threat to health and provide a significant risk of pest infestation.

4.0 Consultation p24 - I totally disagree with Camden's assertion that residents are "happy"/ "satisfied"/ or "in agreement" with the proposal.

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

We were not consulted merely shown the pilots. We question Camdens statement that work will take 10 days "as there is not much to do" in our fully occupied flats. The Pilot flats took 10 weeks to complete, over 6 months) in empty flats. When we visited the pilots the radiators were leaking and HIUs were not running.

5.3 Boiler House proposed - When the existing boilers were installed in 2014/15 the boiler house hoarding was an eyesore then and it still is. Camden cannot maintain that planning permission is needed in order to replace broken down hoardings?

5.7 Sub plant room proposed - impossible to see what is actually proposed

P43 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 pilots are not the ones 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 being turned on and off (MK light switches register 50dB. Night noise should be no more than 30dB) HIUs tested produced 44dB even in a closed cupboard.

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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, so 21 years out of date.
Appendix G p107 Preliminary Thermal Analysis - No insulation is proposed

Conclusion

Whenever the boilers fail another lot of major works will have to begin. BUT - what if the boilers dont last 20 years and fail in two (for example). What is Camden's solution?

This proposal is not an "Upgrade". It is a Zero Carbon by-pass. Boilers, pipework, window frames are all in worse condition than they should be through lack of maintenance, cleaning and upkeep. Camden also seems oblivious to the fact that Leaseholders cannot afford the heating bills let alone TWO sets of Major Works

Camden could choose a SINGLE Greener Option that would reduce the overall life-time cost significantly.

They could choose a Greener Option that would attract government grants

They could choose an Option that would mean far less maintenance and repair costs.

Residents want to see a guarantee or insurance in place that will protect them from being charged for needless works and costs if the boilers fail earlier than expected. I am not prepared to pay for a first phase of works if the second phase isn't identified.

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2023/5338/P	Sarah Batey	20/02/2024 23:03:58	OBJ	<p>OBJECTIONS</p> <p>The residents of the Alexandra & Ainsworth Estate have not been consulted properly prior to this Listed Building Consent application, and as a result the issues below have not been addressed by Camden.</p> <p>The same heating system using HIU's as is proposed for the A&A estate was installed in Highgate New Town, which has been inconsistent and unreliable (as documented in Max Fordham report). It is currently extremely difficult to have Camden/GEM follow up very simple repairs in our estate. The issues that HNT have experienced are much more extensive, complex and recurring; requiring technicians to attend regularly. We are not prepared for this level of disruption to our daily lives, caused by something that we will have to pay a very large sum of money towards to install.</p> <p>Our concerns with the HNT heating system have been dismissed on the basis that the HIU system in our estate will be very different, however we have not been shown any examples of how our heating system will be installed to perform without the same issues.</p> <p>The HIU manufacturer recommends that the HIU's are serviced once a year by a technician in order for them to maintain performance, however Camden has no plans to carry out regular maintenance.</p> <p>The manufacturer does not recommend HIU's be installed in bedrooms, due to the noise that they emit.</p> <p>Despite the 'Phase II' proposal, it is not guaranteed that the new pipework, HIU and radiator system will be compatible with future energy source options, which will run at a lower temperature to the current boilers. These proposals could end up being much more costly and disruptive, if the new system has to be replaced again anyway.</p> <p>Camden has committed to aiming "To improve energy efficiency and achieve Carbon Zero through retrofit". These proposals would lock one of the largest estates in Camden into burning fossil fuels for another 10-15 years, which is not acceptable.</p> <p>I therefore strongly object to the application for Listed Building Consent 2023/5338/P.</p>

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2023/5338/P	Stephen Staples	19/02/2024 12:11:46	OBJ	<p>I am the leaseholder of a two bed maisonette on this estate. I wish to object to the proposals in planning application 2023/5338/P</p> <p>The proposals are entirely contrary to the Government's commitment to zero carbon emissions by 2050. The proposals are a shocking waste of public money throwing money at propping up a heating and ventilation system which was brilliant 50 years ago but has been allowed to fail through lack of maintenance. The proposed heating system is likely to require even more maintenance than the existing system. Camden's track record suggests that the system will not be adequately maintained resulting in more failures and more cost.</p> <p>I have not spoken to a single resident who supports these proposals. Camden say they have consulted residents and indeed they sent out questionnaires and partially fitted out two trial flats. Camden may have received objections from less than 25% of residents but that does not mean that the remaining 75% support these proposals. The silent 75% are simply disillusioned by Camden's lack of response to complaints or requests for action.</p> <p>The proposals will adversely affect the appearance of the rear of A block and the front of B block. This is an iconic building and should not be treated in such a cavalier fashion.</p> <p>The proposals will adversely affect the interiors of all the flats and maisonettes.</p> <p>The estate is an iconic piece of late 20th century architecture and deserves better than these short sighted and mundane proposals. This application should be rejected.</p>

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2023/5338/P	K Goodwin	20/02/2024 00:01:29	OBJ	<p>Reiterating general objections to the proposal – the scale of intervention is unnecessary; the solution is large scale but short term and does not offer a sustainable solution. This incredibly expensive and invasive piece of work will change the thermal performance of the design likely to create mould and damp issues, have high running costs, detract from the iconic listed architecture and need replacing in a decade that neither the public purse nor leaseholders can afford. As has been evidenced in the past, Camden will not do anything as a result, and the infrastructure will deteriorate, and the occupants will suffer. Furthermore, at a time of environmental crisis this solution for 520 homes offers nothing sustainable.</p> <p>Some of the heating has failed not all – mine has been operating well. I ask that the building first be properly insulated with double glazing that fits with heritage listing; localised solutions to fix those poor people who have been without hot water and heating for these past winters and a major upgrade is done when the existing boilers reach their end of life and is replaced by a fully sustainable and efficient solution using renewable energy sources. Money invested wisely for the long term with positive environmental effects. At the very least I request that Leaseholders are given the ability to implement their own systems. And finally, reiterating that the “consultation” has been inadequate, and feedback ignored. The complexity of this planning application is a case in point and separates works that are all interdependent and part of the same process. The design and access statement was not made readily available and buried within the list of documents.</p> <p>On the specifics of this application for 2023/5338/P: The instillation of new distribution pipework will irreversibly harm the exterior appearance of the listed building.</p> <p>The report shows the extent of the pipework which will run across most of the facades and the impact this will have on the heritage integrity of the estate. It is not clear why maintaining the existing internal routes has not been pursued – it looks like an easy option has been taken that will have detrimental impacts and cause maintenance/ upkeep issues in the future.</p> <p>To properly judge the appropriateness of the proposed material selection for this pipework and their fixings (the design of which will be vital), photographs need to be taken with demonstrated in situ mock ups.</p> <p>The report also indicates the clumsiness of service additions that have been made since initial construction which should be removed and given a single coherence to the work.</p> <p>Care with the selection of the expanded metal casings – the example image given looks cheap and unattractive. Attention needs to be given to the fact it will quickly be covered in dirt and cobwebs etc as there is no air flow through like in the reference image it uses as heritage justification (p66 & 67) – I question whether this is the correct solution.</p> <p>I have severe concern regarding maintenance – and an increase required that has not been factored into ongoing costs and expectations.</p> <p>The new cold-water booster tanks with their pumps will need maintenance as will the 520 HUI’s in every unit. The additional pipework on the roofs will mean that the roofs need to be kept even more clear of weeds which have been breaking into the roof surfaces and creating leaks beneath. The pipework is also in places that are difficult to service and maintain. The redundant pipework will need upkeep and maintenance to stop it from rusting – and dealing with the implications when it does.</p>

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2023/5338/P	Robert Hildebrand	18/02/2024 15:43:50	OBJ	<p>Before writing my comments I had a look at other objections made. I read the objection of G & J Ryan. I agree with everything written in this excellent objection. For me the most important objections are:</p> <ol style="list-style-type: none">1. This is not "Residential Minor Alterations". In fact these are very major alterations that will adversely affect the exteriors and interiors of every flat on the estate.2. It seems that Camden have not taken into account the Grade 2* listing of the exteriors and interiors.3. Nobody wants radiators and HIUs in their homes.4. Camden's proposals are likely to lead to damp and mould in the flats.5. There has been no consultation from Camden with the residents and leaseholders.6. There is no point in doing any of these works whilst retaining the old gas boilers, which must be coming to the end of their lifespan and are very expensive to run.7. This application represents a lost opportunity for a green solution. Ours is an iconic Estate and Camden should be showing other councils around the UK how to modernise the old estate wide heating using green methods such as air source heat pumps, PV and solar panels and even wind turbines.8. No mention is made of insulation to the flats.9. I have been advised that leaseholders are to be charged in excess of £30,000 for these works, with potentially the same again when the boilers need replacing. <p>This universally unpopular application should be refused for ignoring heritage and for not considering better, greener, more sustainable solutions in line with current best practice, government guidance and Camden's own green agenda.</p> <p>I ask you to, please, refuse this application.</p>
