
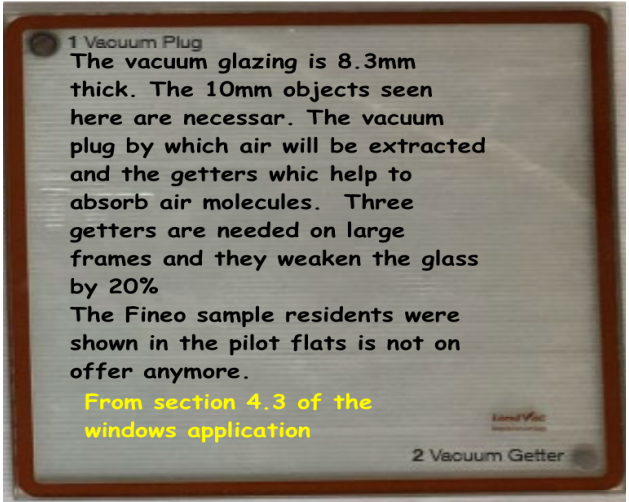

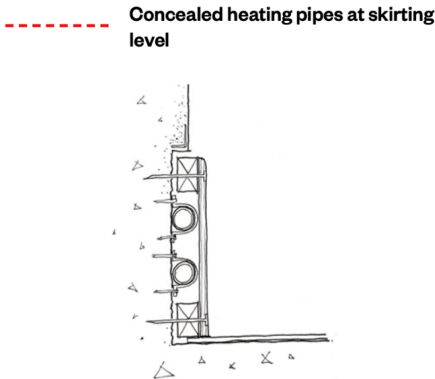


LETTER OF OBJECTION to Listed Building Consent 2024/0286/L and Planning Application 2023/5339/P submitted 22 Feb 2024.	
Site Address: Alexandra Road, Rowley Way, London NW8 0SN	
'External and internal works including replacement of existing single glazing with double glazing ¹ , removal of domestic hot water cylinders and installation of new heating interface unit, emitters and associated pipework.'	
Development Type: 'Listed Building Consent' and 'Residential Minor Alterations'.	
We wish to lodge objections to the application on the following grounds:	
1	GLAZING - This is not double glazing as conventionally understood! It is a very expensive novel form of vacuum glass individually fitted into 40 year plus old timber windows many in dubious condition. It is not a practical or sustainable solution.
2	HEALTH & HERITAGE - No consideration has been given in the proposal to avoid creating condensation, damp and mould by the change from a warm structure to intermittent heating. No adjustments to improve the ventilation to the flats are not proposed.
3	DESTRUCTION OF INTERNAL LAYOUT - Radiator positions are not shown and the disruption to furniture arrangement and existing electrical sockets is enormous, not resolved and underestimated.
4	NOT A SUSTAINABLE GREEN SOLUTION – all this destruction to continue to use gas boilers of unknown life expectancy.
5	BUILDABILITY, PRACTICALITY and MAINTENANCE – all underestimated, unrealistic and therefore under costed.
6	INACURACIES & MISREPRESENTATIONS ABOUND – the planning documents includes inaccurate and misleading statements eg the use of the wording 'double glazing' in the description of the works.
We expand each these points to further explain our objections the following comments below:	
1	GLAZING - This is not double glazing as conventionally understood! It is a very expensive novel form of vacuum glass individually fitted into 40 year plus old timber windows many in dubious condition. It is not a practical or sustainable solution.
<p>VACUUM GLAZING</p> <p>Vacuum glazing is a relatively new, rarely used substitute for double glazing. It is unusual in that there is less than 1mm (actually 0.3mm) between the two sheets of glass. It is very expensive and has been used generally in small panes to improve the thermal performance of Georgian sash windows and the like.</p> <p>This application proposes to fit this very expensive, novel, glass into 50-year-old timber frames of dubious robustness. Why and at what risk?</p> <p>Both the 2000 and 2006 editions of The Alexandra Road Estate Management Guidelines prepared by LB Camden and English Heritage are cited in previous planning applications. Both editions highlight the many issues with the existing (the original and the existing replaced) windows and a great deal of reference to the specialist skills needed maintain them. The expense in both time and money of this has not been recognised.</p>	

	<p>Our investigations show that glazing the vacuum glass into the existing old timber frames will be a highly skilled craft task and each pane will need bespoke fitting. The costs will escalate with the possibility that work will have to be abandoned.</p> <p>The example of poor workmanship carried under the Better Homes Programme makes the possibility of a disastrous result very likely. The specification in these planning applications is not precise enough. Replacing the old end of life window with a modern, insulated, thermally broken, triple/double glazed window (aluminium or composite) to the same sight lines to make it indistinguishable from the original timber windows would seem to be the way forward. This needs to be costed. We do not believe that a contractor could economically restore the windows. Some flats could take many weeks.</p> <p>Financially this also seems a strange decision. Camden have not responded to our queries about the cost of the vacuum glazing. We understand from suppliers that the cost of the glass alone is in the same ballpark cost for new double or triple glazed units supplied complete with frames (that would also come with 20 year guarantees and warranties!). There are flats with rotten casements that cannot be opened, sashes that fit so badly that you can poke your fingers through the gap. Many will be unsuitable for reglazing and will therefore need to be replaced.</p> <p>Technically this seems a strange decision. The thermal performance of the windows drives the heat loss calculations for the flats and therefore the consequential sizing of the plant and radiators. The leaky frames and windows will make the installation of vacuum glass of considerably less benefit and completely undermine the improvement to the thermal performance of the building. It also will mean that more heat/energy (higher installation and running costs) will be required for the foreseeable future so is both an unsustainable and costly option.</p> <p>The size of the windows is an issue for vacuum glass. We have noted that here is only one manufacturer that makes toughened glass thin enough to fit into the existing frames. The planning application states that the glass is the same thickness as the existing, but we haven't seen any evidence. It is likely that the larger panes may be 6mm and the proposed is 8.4mm. For some of the smaller window probably with thinner glass the increase in glass weight may cause problems with both the sash and the existing ironmongery (eg kitchen windows on projecting hinges and the bedroom wide stable doors on traditional butt hinges.)</p> <p>The evolution of vacuum glass has been plagued by lack of robustness² and the glass has been notorious for breakages. We are concerned about security and resistance of vacuum glass to break-ins compared to the glass we have at the moment. While the existing glass is single glazed and not toughened, it is robust. The toughened glass can simply be broken by using a pen sized automatic spring-loaded punch to 'explode' the glass into smithereens and available for £5.00 off eBay.</p>
	<p>Vacuum glass needs special coatings to work optimally. The modern, often, metallic coatings are specified to give best thermal performance depending on the glass orientation. North facing glass to retain heat, south facing to reject heat. Has any of this been given thought? What impact will the coating have on the light transmittance and colour of the glass and the appearance for a homogenous building. This is not covered in the specification.</p>
	<p>All the research we have done into vacuum glass raises more concerns.³</p> <p>The vacuum glass come in panels cut to the required size from China. Despite the repetition of flat types each window could be a marginally different size making both the initial installation and replacements an issue. We have not had our questions properly answered on these points.</p> <p>If the glass is both expensive and difficult to get hold of how will Camden ensure that broken glass is replaced with vacuum glass?</p> <p>The pilot flat had Chinese vacuum glass fitted. However, residents were shown a sample of Fineo glass (produced in Europe) and were reassured by Camden (verbally) that Fineo glass will be used to</p>

	<p>respond to the comments made by residents about being able to replace the glass in case of breakage. But now, it appears that Fineo vacuum glass can't be used, because their safety glass is thicker and therefore too heavy. Research also reveals that it is vulnerable in transit - some sites in China have had 20-30% breakage rate on vacuum glass delivered to site.</p>
	<p>The vacuum glass works on the two sheets of glass separated by a fraction of a millimetre (0.3mm). The little dots that hold the sheets apart are called stools.</p> <p>All the larger panes of glass have circular 'vacuum plugs and getters' which are '<i>necessary to extract air and absorb air molecules(?)</i>' but they also reduce the strength of the glass by 20%.</p> <p>On larger sheets of glass, the stools can 'drop' or fall to the bottom of the cavity at which point the glass will fail totally.</p>
<p><i>See below images from pilot flat installation and application documents:</i></p>	
 <p>1 Vacuum Plug</p> <p>2 Vacuum Getter</p>	 <p>1 Vacuum Plug The vacuum glazing is 8.3mm thick. The 10mm objects seen here are necessary. The vacuum plug by which air will be extracted and the getters which help to absorb air molecules. Three getters are needed on large frames and they weaken the glass by 20%. The Fineo sample residents were shown in the pilot flats is not on offer anymore. From section 4.3 of the windows application</p> <p>2 Vacuum Getter</p>
	<p>RAILWAY LINE VIBRATION</p> <p>How much do the adjacent railway line cause vibration? We know that some of the buildings have special isolating foundations, but I doubt that this aspect has been examined in terms of impact on the long-term functioning of the glass. Is it possible that the vibrations or airborne high and low frequencies from goods trains will cause the stools to slip down the cavity? This is a highly technical subject, and I doubt that it has been examined fully - but there are experts out there who can advise.</p> <p>Equally, in terms of acoustic performance, it would be sensible to test and analyse the glass for any unexpected consequences of the coincidence effect of same thickness glass either side of a cavity and impact on performance.</p>
	<p>Is reusing the existing windows some misguided notion to 'retain the heritage'? The risks in taking this novel approach seem to be very high for the council. Bearing in mind that the current window configurations could be replicated virtually like-for-like using tried and tested, high quality double/triple glazed thermally broken aluminium or aluminium/timber composite frames this seems to be an ill, or at the very least, an under considered option.</p>
	<p>Surely, this seems to be the right time to RECONSIDER if it really makes any sense to put an expensive novel form of vacuum glass into very old timber windows, many in dubious condition.</p>

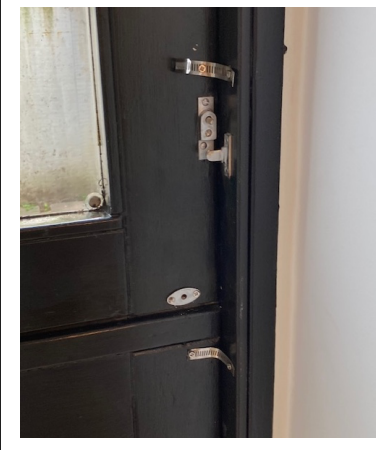
2	<p>HEALTH & HERITAGE - No consideration has been given in the proposal to avoid creating condensation, damp and mould by the change from a warm structure to intermittent heating. No adjustments to improve the ventilation to the flats are not proposed.</p>
	<p>We think it is fundamentally important that Camden develop a design to ensure landlord supplied background heating is provided to avoid condensation as <i>the existing heritage design strategy has proven so successful and still functions today.</i></p> <p>Currently there is no mould or condensation within dwellings on the estate. It is a point of heritage that the designers, who were aware of the science regarding condensation and mould, made a decision in agreement with Camden to ensure that enough background heating was supplied to avoid condensation and its consequences.</p> <p>The thermal design strategy was ‘an explicit part of the original brief’ and is an intrinsic part of the heritage.</p> <p>Any replacement heating must carry out the same function as the existing design. This will ensure that the buildings do not degrade and continue to provide a safe and healthy homes for its residents who currently do not suffer from condensation, damp or mould.</p>
	<p>HEALTH OF RESIDENTS AND VIABILITY OF THE BUILDING</p> <p>The current proposal abandons the ‘warm structure’ principle with potentially ruinous results. While it sounds reasonable for people to pay for the heat they use this approach needs challenging as changing the fundamental thermal model will have consequences. ‘Equality for all’ was one of the social drivers for the scheme.</p> <p>It will be difficult to persuade people on a budget to heat the property to maintain a background temperature to protect them and the building fabric, once they start to receive itemised bills. Intermittent heating and a colder structure will mean that damp, mould and condensation will be inevitable given the identifiable cold bridges.</p> <p>It is easy to miss this problem hidden under the green cloak of ‘only paying for what energy you use’ and more thought and attention needs to be paid to this issue by the designers to ensure that their change to the design does not cause insurmountable problems that will ultimately cause the buildings to fail horribly. Of course, the Council is working to a budget, but a grade 2* building will always need very careful design and possibly incur higher running costs.</p> <p>Camden award contracts on price, not quality, so the specifications need to be bullet proof. Even though this is a Listed Building Application with original fabric being replaced, there are not enough detailed ‘as existing’ and ‘as proposed’ drawings in the submission. eg the new ‘replica’ cupboards with sliding doors required in the type B3 flats being replaced to house HIUs.</p>
	<p>It is quite clear that from when it was first listed, the importance of how repairs (and future works) would be carried out would be important and the role of English Heritage in ensuring this would be critical.</p>
	<div style="display: flex; justify-content: space-between;"> <div data-bbox="268 1653 815 1877" style="border: 1px solid black; padding: 5px;"> <p>ing. Brooke hailed the estate as ‘one of the most distinguished groups of buildings in England since the Second World War’, and added that it was being listed immediately, because of concern about the quality of the current repairs.</p> </div> <div data-bbox="863 1653 1449 1892" style="border: 1px solid black; padding: 5px;"> <p>The listing decision makes the involvement of English Heritage obligatory, so their officers will advise on all future phases of work on the estate.</p> </div> </div> <p>Quote from Peter Brook on the listing of Grade 2* Estate (Conservative Secretary of State for National Heritage 1992-1994.)</p> <p style="text-align: right;"><i>Article in the Architects Journal - 1 Sept 1993</i></p>

	<p>We don't understand the lack of support from Historic England with regard to protecting the unique heritage or Rowley Way. It is so disappointing, and we can only surmise that the lack of detail in the application is clouding the extent of damage and destruction that will result so Historic England have not appreciated the extent.</p>
<p>3</p>	<p>DESTRUCTION OF INTERNAL LAYOUT - Radiator positions are not shown and the disruption to furniture arrangement and existing electrical sockets is enormous, not resolved and underestimated.</p>
	<p>In terms of the interiors, there will always have to be a decision as to what sort of heat emitters to provide within the dwellings, but disingenuous statements are made in this planning application.</p> <p>The size of heat emitters can and must be calculated before work starts on site. For technical performance reasons, there are not many options for locating radiators. The document pretends otherwise, and residents have been told they will have a choice. The SIZE and location of the RADIATORS is crucial to limiting the fabric damage to heritage within the flats but will also will determine the technical capability of the system.</p> <p>Why are the radiators NOT shown correctly on the plans? These issues and the optimal piping arrangements cannot be intelligently reviewed until this information is available</p> <p>If the project is future proofed (as claimed) to eventually work with the air source pumps proposed, the radiators will need to have larger surface areas than would be required using the existing high temperature flow rates of the existing boilers. The boilers might not work if de-rated to lower temperature output. What impact has this got on the distribution pipework? We don't want to go through this process again when the existing boilers fail, and the interiors receive another hammering.</p>
	<p>We ask that the original electric socket outlets are indicated on the drawings as the position of sockets constrain furniture layouts. A base line strategy of showing furniture layouts should be established to explain optimal location of radiators. The residents have been told that they can place radiators wherever they like to suit their own internal arrangements, but this is simply not true. In a fully considered planning application, the positioning of radiators will have to suit technical parameters for optimal performance positioned to help to cope with cold bridges. To pretend otherwise is disingenuous.</p>
	<div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;">  <p>Proposed finished skirting board in pilot flat Electrical trunking shown above</p> </div> <div style="text-align: center;">  <p>Concealed heating pipes at skirting level</p> <p>This does not show where the displaced electrical wiring and sockets are relocated.</p> </div> </div>
	<p>Particular radiators including flat panel radiators were shown to us in the pilot flats and brochures are included in the planning application, but they are not referred to in the specification. There are no drawings. There is simply no way that Camden will be able stop the Contractor substituting these radiators for cheaper ones.</p>

	<p>A decision has been taken to remove the existing flush skirting boards and replace them with a new trunking which is meant to match the existing. Obviously, it can't match the existing, the skirting goes from flush with shadow gap, to projecting with a ledge on top. This may well be inevitable but it has not only huge visual impact on the heritage achievements of the original but interferes with the living room sliding doors ability to function ie slide! The decision has simply not been thought through.</p> <p>A further consequence of placing the radiator pipework behind the skirting means that the electrics are displaced. In the pilot flat, the square section electrical conduit (<i>see photo</i>) is positioned above the new trunking skirting. It looks dreadful (and this is one of the better instances) but it is also looks careless and has been not designed and will interfere with many residents' existing furniture layouts. Additionally the relocated sockets are surface mounted and project off the wall causing more disruption to existing layouts.</p> <p>These details escaped under the radar in the Better Homes work recently completed. Many flats look a mess. The HPA does not cover the leaseholder flats, and there is a feeling (I think it is correct from the appalling things that have happened) that Camden tenants are being treated as second class citizens.</p> <p>There are alternatives that could be considered. They have been used in refurbishment projects of other blocks of flats where the designers have thought things through - such as the Trelick Tower or Park Hill in Sheffield where concrete walls could not be chased. On those projects other forms of surface containment were used. Where is the visual intelligence here?</p> <p>It is the lack of co-ordinated design that is so potentially ruinous to Neave Brown's design. If these issues were better considered a much better solution could be achieved that coordinates the electrics (including the use of a designed surface mounted conduit), the heating pipework and actual size radiators.</p>
<p>4</p>	<p>NOT A SUSTAINABLE GREEN SOLUTION – all this destruction to continue to use gas boilers of unknown life expectancy</p>
	<p>The main issue is that this heating proposal relies on using GAS, retaining boilers that are out of warranty and of unknown life span. Even if that were a sensible option, the associated earlier planning applications 2023/5338/P and 2024/0091/L propose a new distribution pipework to facilitate this temporary solution, using new external routes (although describing it as 'renewal' is misleading) which will destroy the appearance of the Alexandra Estate. Why go for such a backward-looking solution?</p> <p>Please consider our objections listed against 2023/5338/P and 2024/0091/L as part of the objection to these applications too.</p>
	<p>Residents share Camden's ambition to seek a modern up-to-date heating solution that does not rely on gas. The existing boilers have an unwarrantable life span and could fail in the short term. The external inadequately lagged pipework may not be useable for future use when the boilers die.</p>
	<p>We are aghast and extremely disappointed that no use has been made of the extensive roof space for solar thermal, community energy, heat pumps, passive cooling and other technologies used either separately or combined in innovative hybrid solutions. For instance, solar energy could be used to give some background heating to the flats with poor insulation with other heating sources providing top up additional heating. The fact that one of the unique green and sustainable opportunities available at Rowley Way (ie the south facing flat roofs) have been ignored is extremely questionable and such a loss.</p>

	<p>The applicant acknowledges on the planning form that they are not providing any Electric Vehicle recharging points! There is no zero-carbon approach here. This is a lost opportunity as the many new pumping stations are located in the car park, and it would be easy to provide one or two bays adjacent to each of those locations, at an advantageous price as new electrical supplies will be needed to the pumps.</p> <p>It is shame that the Council is not using this opportunity to help their residents adopt green technology.</p>
<p>5</p>	<p>BUILDABILITY, PRACTICALITY and MAINTENANCE – all underestimated, unrealistic and therefore under costed.</p>
	<p>The Technical Report submitted as part of the associated infrastructure application is biased towards a technical solution which ignores heritage considerations. For example on page 91 it proposes external pipework citing the reason as causing less disruption to residents it advises:</p> <p><i>‘The heating replacement scheme should aim to relocate common pipework to locations outside dwellings so that it is more readily acceptable - this will help reduce future disruption to residents.’</i></p> <p>(Imagine what Buckingham Palace would like if pipes were run externally for services because it was 'difficult' to accommodate them internally!)</p> <p>There are generous internal service ducts at Rowley Way leading to all flats which could be reused that the current proposals will make redundant, seal off and fire stop at every floor level so disrupting EVERY flat! The accompanying Technical Report also states that this will require simultaneous access to service ducts from the floor above and from the ceiling below to physically carry out the work. The fact is that during construction the residents are going to be very disrupted by diamond drilling and routing new distribution pipework through to HIUs. Routes are shown with no consideration as to how those routes will be achieved without major disturbance to fixtures and fittings. DISRUPTION to residents under the current proposal will be huge!</p> <p>While that disruption is taking place, new pipework could be installed. External pipe routes would not be necessary. Has this even been considered?</p> <p>Why are they not being used? Discounting an option to avoid disruption for residents is disingenuous and being used as a spurious argument.</p>
	<p>Currently very little access is needed to individual flats for maintenance /repair of the heating /hot water systems. In nearly a decade we have had one visit and that was when the gas pipes were re-lined.</p> <p><i>(The gas pipes were re-lined by spraying an epoxy powder inside the pipes, and then heating the pipes to seal them. You can imagine how critical this high-tech solution is because of safety. Not a question of people being made wet by a leak, but the building exploding. If the technology that was used for the gas pipes was both practical and cost effective for a gas service could it be investigated for some of the corroded heating pipework connections?)</i></p> <p>However in the current proposal, every single flat will need to be visited at least once per annum to service the HIU alone. Just think of the cost of gaining access to 520 flats once let alone if a second visit is needed!</p> <p>The pumps, filters, valves diverters, thermostats etc that will all also require maintenance. So, the argument about the proposals not inconveniencing residents is invalid. Having chosen to route much of the pipework on the outside of the building, more maintenance will be required to the proposed external pipework (to clean off pigeon dirt, maintain the aluminium casings etc.) In some locations this will be very difficult such as the north facing elevation adjacent to railway (Block A) which cantilevers out as it rises.</p>

	<p>Please consider our objections listed against 2023/5338/P and 2024/0091/L as part of the objection to these applications too.</p>
	<p>We object to the proposed HIU's following from the experience of residents at Highgate New Town (HNT) also known as the Whittington Estate where residents have been suffering for six years with an equivalent scheme that also tried to mix old and new.</p> <p>The HIUs in bedrooms give out too much heat making the bedrooms uncomfortable to sleep in. Noise from the HIU's is also an issue at Highgate New Town. Quoting noise characteristics in the Acoustic Report submitted as part of the application (such as the dB L_{a90}) does not give us comfort because the metric allows short sharp noises at intervals through the night, equivalent to a light switch clicking on and off. In the dead of night, these clicks are likely wake someone up as the proposal locates the HIU's in a bedroom.</p> <p>There is also a problem of insufficient hot water and kitchens and bathrooms can't be used simultaneously.</p> <p>(Note that the driver for replacing all the existing cold-water services at Rowley Way is that higher water pressure is needed for the HIUs to work as per the associated planning applications 2023/5338/P and 2024/0091/L. This generates many pumping houses in the car park area and horrendous external pipework that routes up the outside of most of the blocks.)</p> <p>There is also a contamination of the heating circuits on the Camden supply side not allowing sufficient heat through to the flats and these issues have not been adequately addressed for seven years.</p> <p>Please consider our objections listed against 2023/5338/P and 2024/0091/L as part of the objection to these applications too.</p> <p>Even though this is a Listed Building application with original fabric being replaced there are no 'as existing' and 'as proposed' drawings in the submission. This is a serious omission.</p> <p>As an example, in the pilot flat (B3) a well executed 'replica replacement' bedroom cupboard was shown to us. We know it took a very long time to construct requiring a high standard the workmanship. However there are no drawings, specification or photograph of this to record what is required without which there is no way this will happen, and we will all end up with an inferior solution.</p> <p>Having supported the idea of the replacement cupboard, we note that we have no information about the acoustic performance of the cupboard, which is meant to attenuate the sound of the HIU's (clicks and pump noises). This needs to be specified, along with what seals will be used to avoid sound leakage.</p> <p>We have learnt that the works at Highbury New Town were not fully designed, not competently specified and not properly executed. Inadequate records were kept of the installation. From the information supplied in both these applications and the associated applications 2024/0286/L and 2023/5339/P it is likely we are heading to a similar situation. The lack of clarity in the description of the works, an impoverished specification combined with wishful thinking on behalf of the applicant/client will leave this historically important building and its residents in a complete mess.</p>

	<p>PILOT FLATS NOT COMPLETE The pilot flats are unfortunately still incomplete (as the applicant acknowledges.</p> <p>Many, small but awkward items such as the window ironmongery to the fanlights and stable doors have not been solved and very bodge' solutions have been adopted. The specified ironmonger ceased trading in the late 1990s.</p> <p>We also know that it took a VERY long time for the work to take place- much longer than anticipated before work came to a stop. This is a major reason for not believing the time frames included in the application about how long the work will take. Either we will get a lash-up or the scheme will be unaffordable and possibly grind to a halt.</p>  <p>The Better Homes Work carried out across the estate has been disastrous. There are many instances where original features were smashed out because the cascade of knowledge from management to workforce didn't happen. There was insufficient on-site inspection of the work while it was taking place. Residents didn't realise that the work was damaging this Grade 2* Listed Building as it was being carried out by Camden so would have assumed it had approval!</p> <p>The Heritage Planning Agreement was submitted under the radar in 2016 just after a previous application that had been heavily criticised by the A&A Tenants Association was withdrawn. This second submission was missed by residents and they feel very cheated by this sleight of hand.</p> <p>Again, that application was also described as signalled as 'Residential Minor Alterations'.</p>		
6	<p>INACURACIES & MISREPRESENTATIONS ABOUND – the planning documents includes inaccurate and misleading statements eg the use of the wording 'double glazing' in the description of the works.</p>		
	<p>The list of documents in Planning Application 2024/0286/L replicates the documents in 2023/5339/P however the description is adjusted to acknowledge that the interiors are part of the listed fabric. So although the planning document intimates, they are the same they are not.</p>		
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31/01/2024 11:37	Application Form Redacted - Please refer to planning application ref 2023/5339/P for all drawings and supporting information		
	<p>There are many dubious statements made in the applications. Sometimes good advice is quoted but not followed through, so, for example on page 40 of the Technical Report submitted with the earlier infrastructure application it states:</p> <p style="padding-left: 40px;">'where the building fabric is improved the background ventilation should also be considered, this is to avoid future problems and unintended consequences.'</p> <p>Anyone processing the application will probably take comfort from this. However, this sound advice has not been followed up otherwise we would see the impact on these second applications for Residential Minor Alterations works. A problem for the future – condensation and mould will arise.</p>		
	<p>The drawings on these applications and the earlier 2023/5338/P and 2024/0091/L do not align. For instance in Block A.</p>		

The earlier applications, for new distribution pipework propose that **three** pipes travel up every alternate fin.

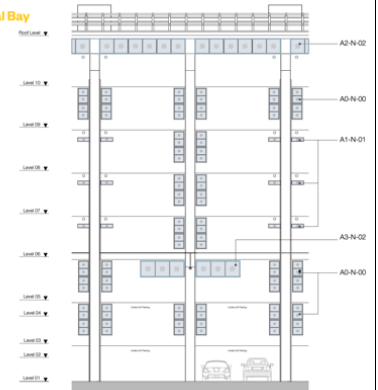
The **three pipes** are shown on the technical drawings, but the only close-up 3D visualisation shows an instance where **only one** pipe runs up.



4.4 Proposed Elevations

Block A North Elevation - Typical Bay

- Proposed works**
- Refurbish operation and seals of window where elements are missing, difficult to operate or broken
 - Refurbish secondary glazing where missing elements, difficult to operate or broken



Planning applications 2023/5338/P and 2024/0091/L showing 3 pipes.

Planning applications 2024/0286/L and 2023/5339/P showing NO pipes!

These drawings demonstrate why it is not safe to have two separate planning applications. They are one and the same! People reviewing the second, later applications will think there are no external pipework!

The planning application is faulty, consider the following inaccuracies made in the application form.

In the section '**Listed Building**' in answer to the question

*'Do the proposed works include.....
c) works to any structure or object fixed to a property (or buildings within its curtilage) internally or externally?'*

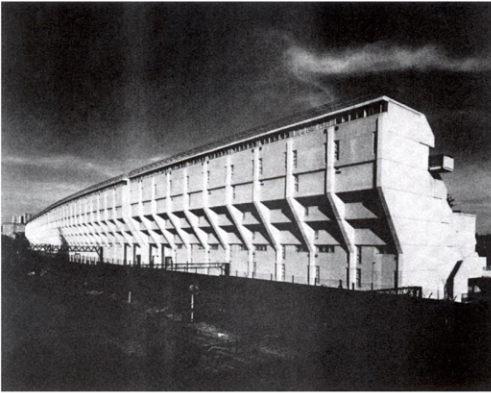

The applicant has ticked the **No** box. This is incorrect.

Some examples:

- the original cupboards are being replaced in many locations, as we saw in the pilot flat.
- the original recessed skirting and shadow gap detail is being replaced with trunking
- the cylinders are being removed.

In the section '**Reused/Recycled Materials**'

the applicant states that there will be **0 percentage** of material re-used or re-cycled. This indicates that it is likely that historically re-useable material will simply be binned. How green is this?

	<p>In the section titled ‘Projected cost of the works’</p> <p>the applicant states that the estimated cost is between £2,000,000 and £100,000,000. This gives the lie to the description as ‘Residential Minor Alterations’.</p> <p>We are concerned that because of the inadequate, unresolved and permissive application that the projected costs will certainly get out of hand as contractors will be free to do what they want. But £192,000 per property? Please don't pretend it is a typo.</p>
	<p>The architectural specification is hidden under the title ‘Emitter and Thermal Improvements’ which tool some tracking down. The document is very permissive, insubstantial and in precise.</p>
	<p>PRESESRVING THE EASTHETIC - BRUTAL , ROBUST & SPARE</p>
	<div style="display: flex; justify-content: space-around; align-items: center;">   </div> <p>Rear Elevation Facing Train Line to the North</p>
	<p>The left hand image is from the English Heritage/Camden Alexandra Road Estate - Management Guideline document from 2000. The right hand image is from 2024 and shows how well the estate has survived over the intervening 24 years.</p> <p>The drawings above for the current proposals which are not adequately visualised and will destroy the elevation.</p>

THE MISLEADING MATRICES PRESENTED TO BIAS THE TECHNICAL ASSESSMENT

Rectangular Selection **x of heating options - summary**

Key: Low impact, Medium impact, High impact

Emitter type	Carbon emissions	Heritage impact	Capital cost	Running cost	Reliability/maintenance	Disruption on installation	Future climatic resilience	Outcome
1 Communal heat pump Swap the gas boilers in the main plant room for heat pumps	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Swapping the communal gas boilers for heat pumps in the future is a low carbon, low capital and low running cost option.
2 Communal high temperature heat network Use of a high temperature heat network connected to heat pumps <i>But better o/a than continuing with existing boilers?</i>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The use of a high temperature heat network is comparable with the current and a future heat network.
3 Communal low temperature heat network Use of a low temperature heat network connected to heat pumps	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The use of a low temperature network is not compatible with the current proposals and requires local heat pumps to be installed in every home.
4 Individual gas boiler Individual gas fired boilers in each home	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Installing new gas boilers is not compatible with meeting the UK and Camden's climate goals.
5 Individual air source heat pump Individual air source heat pumps in each home	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Individual heat pumps are not a heritage friendly option, nor are they practical for this Estate.
6 Individual direct electric connection Individual direct electric connection to each home	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Individual direct electric connections would require upgrades to the electrical network on site. Direct electric would also be more carbon intensive and expensive for residents than heat pumps.

nor is the applicants proposal to continue to burn gas compatible with targets? Better overall for CO2 when you take into account distribution losses?

Note - Although not a predetermining factor, the cost of the works is a significant project constraint. The solution has primarily been driven by heritage, quality, energy use, carbon emissions and running costs, however, the future costs for this work will also need to be proportionate for both Camden and leaseholders.

could that work? Surface area, being enclosed etc, so not really an option.

but aren't most future heat networks low temperature?

doesn't this contradict claims elsewhere about future proofing? why does it mean to be in every home?

Didn't look too bad on ? scheme. Why not practical? Electrical supply?

This matrix is faulty in the claims it makes. It demonstrates how biased the proposals are in that they do not consider low carbon alternatives. A false argument is presented as it is not an inclusive one.

Having prejudiced the choice of heating source, this second table justifies choices. The two green outcomes are simply incorrect.

Matrix of heating emitter options - summary

Key: Low impact, Medium impact, High impact

Emitter type	Sympathetic to the original design	Clashes with heritage features	Distribution of heat in the home	Control of heat	Installation	Distribution pipework	Reduction in size of rooms	Maintenance and repair	Outcome
1 Underfloor heating Underfloor heating is a form of heating in which the floor surface is heated by hot water pipes underneath.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Although underfloor heating would provide a comfortable heating system, it cannot be installed in the homes due to the disruption to residents and the significant clashes with heritage features.
2 Ceiling mounted heating Ceiling mounted heating follows the same concept as underfloor heating whereby hot water pipes are run in a ceiling void within the homes.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	As with the underfloor heating system, the ceiling mounted heating cannot be installed in the homes due to the disruption to residents and the significant clashes with heritage features.
3 Integrated wall heating A new layer of wall could be added to existing walls with heating pipework embedded within.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	This system is sympathetic to the original design, however, there is disruption to residents during installation and significant clashes with heritage features.
4 Wall mounted heating Heating emitters such as radiators could be surface mounted on walls in each room.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	While wall mounted emitters are least sympathetic to the original design, they provide a heat source which has the least disruption for residents on installation and will clash the least with heritage features.
5 Integrated emitters in architectural features Heating emitters could be concealed in architectural features such as skirting boards and plinths.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Integrated emitters in architectural features will be visually sympathetic. There will be moderate disruption on installation and clashes with heritage features will be kept to a minimum where possible.
6 Fan heaters The original design contained fan heaters concealed as part of the ventilation system under the built-in cupboards.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Due to the limited options on location and the poor quality and distribution of heat in the home, this system has been discounted.

surely this is wrong if 1 above is correct

surely this is wrong

surely this is wrong

surely this is wrong

surely this is wrong

surely this is wrong

surely this is wrong

surely this is wrong

foolish claim, completely incorrect

Simply doesn't work. Never an option, fan heaters supplemented the heated walls, never a stand alone solution. Why include it here?

This is not true. Surface mounted wiring, getting rid of recessed skirtings, cutting pieces out of sliding doors all totally destroy the existing heritag

Floors will not warm up where against the ground nor will it help with keeping thermally continuous concrete party walls warm

the installation will be very difficult. Rewiring, new cupboards, windows etc. The flats will need to be vacated.

effective use of space will be compromised and will reduce useable space

Annual maintenance - where not required now, and balancing of the system. Camden need to ensure modicum of background heating

Note - Although not a predetermining factor, the cost of the works is a significant project constraint. The solution has primarily been driven by heritage and quality, however, the final costs for this work will also need to be proportionate for both Camden and leaseholders.

- Option 4 - while radiators may be the final choice - is fundamentally not green (ie best option) as it flies in the face of the heritage design which sought explicitly to exclude radiators.

Even if it Option 4 was the only choice, the assessments that this table make are biased and incorrect for the reasons given.

- Option 5 - was never a possibility in that the surface areas were never going to be large enough.

I would be glad to explain this further. Lets have some honesty, please.

PRESESRVING THE EASTHETIC - BRUTAL , ROBUST & SPARE



Rear Elevation Facing Train Line to the North



The left hand image is from the English Heritage/Camden Alexandra Road Estate - Management Guideline document from 2000. The right hand image is from 2024 and shows how well the estate has survived over the intervening 24 years.

The drawings above for the current proposals which are not adequately visualised and will destroy the elevation. Note that these planning application pretends that no changes are made to this elevation and yet the internal work - as proposed - depends on the external pipes shown in the previous two applications.

We do not understand the separation of this application from the earlier infrastructure applications 2023/5338/P and 2024/0091/L as they are mutually dependent.

This creates confusion and inaccuracies.

For clarity, in this letter of objection we will refer to submission 2023/5339/P and the Listed Building Consent 2024/0286/L application together for the purposes of objecting.

Extracts from the Alexandra Road Estate Management Guidelines

These guidelines have been submitted in support of previous Levitt Bernstein Planning and Listed Building Consent applications. They are still valid but have been ignored in this submission.

Alexandra Road Estate
Management Guidelines
March 2000



Levitt Bernstein
Architects

11.10.3.1

Sliding Glazed Doors to large screens - living room

All sliding doors have been replaced and a number of the complete screens.


The screens have been replaced to the original design and stain colour.

In the report 2/4/98 ongoing problems affecting these screens were identified as south facing solar gain, together with black stain causing maximum heat absorption and internal heat build-up due to lack of control of heating systems. These problems cause excessive movement in the joinery which in turn affects the ability to slide on the track and

Objection to Planning Application Listed Building Consent 2024/0286/L and Planning Application 2023/5339/P.

	<p>9.7 Listed Building owners have a responsibility to keep them in good repair. The Council therefore has a special responsibility to maintain Alexandra Road Estate.</p>	<p>On the stable doors, recommendation has been made to further improve the top leaf hanging by using some form of continuous hinge to overcome the tendency for leaves to drop.</p>
	<p>11.10.3.3 Wooden Windows Generally</p> <p>Opening lights generally have been replaced, frames repaired and redecorated. (Repair work has been done with Windowcare.) Fitting new opening lights in existing frames, particularly in long bands on Block B & C has required considerable skill as there is little tolerance on the ironmongery because the frame distortion needs fine adjustment. This will lead to on-going maintenance problems.</p> <hr/> <p>Alexandra Road Estate Management Guidelines 66</p>	<p>9.9 Listing helps to protect and maintain a building, by requiring the original material to be used for repairs, rather than cheaper substitutes. As a result of this, maintenance and repair of Alexandra Road estate tends to cost relatively more than for an unprotected estate. In recognition of this fact the maintenance allowance given to the Co-op is higher than for an unprotected estate.</p>
	<p>9.10 All works to Alexandra Road Estate must be approved by law. In practice it would be impossible to seek permission for every job because hundreds of maintenance jobs are done on the estate each year. In most cases these are routine jobs which do not affect the appearance or character in any way. For example, changing the taps on a wash hand basin, or fitting a new light switch. Some jobs do make a big difference, even minor ones. For example, painting the stained wood frames to windows or doors. To avoid doing work which would break the listed building conditions and to show the Co-op and occupiers what can be done, 'Management Guidelines' have been written.</p> <p>The following list of common jobs has been selected from the full "Management Guidelines" held by the Coop. If a job does not appear on this list it probably cannot be done without Listed Building Consent and/or Planning Permission. If in doubt please do not go ahead, but ask Co-op staff for guidance.</p>	
	<p>11.10.6.3 Ironmongery</p> <p>General ironmongery was obtained through Beaver Architectural Ironmongery [Consortium Supplier].</p> <p>Front door ironmongery was supplied with the Multisecure doors. Also refer to 11.10.3.6</p> <p>Windows</p> <p>The existing window stays had largely outlived their useful life. The new ironmongery (because of the situation with new windows in old frames), requires a high level of skill to obtain optimum fixing location.</p> <p>Sliding Doors [L.R. Screen]</p> <p>The problem with the existing screens was that the sliding doors could be relatively easily lifted off the tracks making them insecure. After various trials a locking angle was devised to overcome the problem. The locating bolt has a coarse thread to allow for some misalignment but it</p>	
	<p>11.10.3.9 Brush Seals and Draught Strips</p> <p>All the existing seals on joinery have been replaced with Schegel Seals and draught strips which are more robust.</p> <p>A problem with all the joinery has been excessive movement due to dark stain [being heat absorbent] and abnormal heat build-up in the flats, this in turn affects the seals and strips as they can only cope with normal expected movement. If too much adjustment is made the brush seals in particular make the sliding doors difficult to move. There have also been some problems with seals 'part reversing' when closing windows.</p> <p>The seals do have a limited life in use and replacement within the expected life of the joinery should be planned. There have been complaints during the contract of draughts past the seals. This appears to happen on strong windy days with certain wind direction. It should be understood that the seals are not airtight and there always will be some limited air movement [which helps reduce condensation].</p>	

Objection to Planning Application Listed Building Consent 2024/0286/L and Planning Application 2023/5339/P.

	<p>11.10.3.8 Windowcare System</p> <p>A proprietary repair system has been used throughout on joinery. This has provided an excellent repair system giving the joinery a new lease of life. Any future repairs should use this system. Windowcare provide an inspection and advice service as it requires some specialised skills. There is a range of products for different types of joinery failures and Windowcare should be consulted prior to work being carried out.</p>
	<p>11.10.6.3 Ironmongery</p> <p>General ironmongery was obtained through Beaver Architectural Ironmongery [Consortium Supplier].</p> <p>Front door ironmongery was supplied with the Multisecure doors. Also refer to 11.10.3.6</p> <p>Windows The existing window stays had largely outlived their useful life. The new ironmongery (because of the situation with new windows in old frames), requires a high level of skill to obtain optimum fixing location.</p> <p>Sliding Doors [L.R. Screen] The problem with the existing screens was that the sliding doors could be relatively easily lifted off the tracks making them insecure. After various trials a locking angle was devised to overcome the problem. The locating bolt has a coarse thread to allow for some misalignment but it</p>
	<div style="text-align: center;"> <p>Alexandra Road Estate Management Guidelines</p>  <p>2nd Edition</p> <p>Camden ENGLISH HERITAGE</p> <p>Levitt Bernstein</p> </div>
Gerard and Judith Ryan	