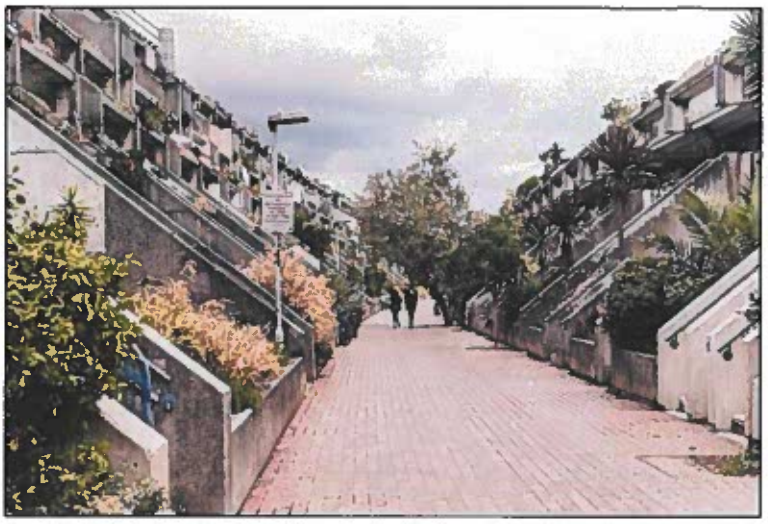
Alexandra and Ainsworth Estate
Tenants and residents' Association



29th February 2024

Dear Mr Burns,

The Grade II* listed Alexandra Road Estate ("Rowley Way"), designed by Neave Brown and completed 1978, is one of the most important examples of social housing in the world. It should be the pride of Camden, but the Council is threatening to harm it with a proposed new heating system (currently going through Planning). This fails to address crucial environmental and architectural concerns. Some are:

1. **Lack of engagement and consultation:** the Council claims to have consulted us and that we support the proposal. That is untrue. Hundreds of residents have registered objections to the planning applications, reflecting widespread resistance across the whole community.
2. **Threat to architectural integrity and the listing:** the proposal requires new external and internal pipework, with new radiators in the 520 listed interiors. These would harm Neave Brown's architectural vision. We residents are resolutely opposed to this. It must not happen.
3. **It isn't green**: there is no intention in the proposed new heating system to seriously reduce heat loss and energy demand. This is against Camden's own target of zero emissions by 2030.
4. **We want a better alternative:** green alternatives exist that are more cost-effective and environmentally friendly. They would minimise the impact on architectural features, reduce maintenance burdens, and offer individualised heating for residents.
5. **Neglecting the climate crisis:** the proposal overlooks the climate crisis and fails to address global warming. We should be investing long-term in renewable energy solutions and an up-to-date engineering approach that looks forward for at least the next 40-50 years. But Camden plans to waste £15.5m on an inappropriate system that is completely out of date even now.
6. **Cold and mould:** there is nothing in the applications about condensation and mould. It was only when residents themselves drew attention to this serious problem that Camden now claim to be revising the project, to deal with it: we find these engineering blind spots very concerning.
7. **Camden's "no maintenance" culture**: as residents we know that Camden would never maintain the new system and would simply waste money on "patching up" when something breaks down.
8. **Intrusion, stress, and disturbance:** Camden's engineers only see empty rooms and silent drawings. It has never occurred to them that these are the homes of families, with lives going on. The Better Homes were bad enough; this would be worse. We are already stressed and worried.
9. **Camden has got this wrong**. There is still time to reconsider this project. It is in the Council's interest to listen to what hundreds of residents are saying - not the technicians. They don't know.
10. **Please support us**. We need our elected councillors to protect us from this impending nightmare.

For your information:

Objections to the planning applications

2023/5338/P: 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. FYI so far 278 objections registered online.

2023/5339/P: Replacement of existing single glazing with double glazing and associated works. FYI so far 349 objections registered online.

2024/0286/L: External and internal works including replacement of existing single glazing with double glazing, removal of domestic hot water cylinders and installation of new heating interface unit, emitters, and associated pipework. FYI so far 196 objections registered online.

2024/0091/L: 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. FYI so far 186 objections registered online.

The objection letters registered online are short as Elaine Quigley, in planning, still has a number to upload on behalf of the residents. We are still chasing her to do this.

To-date we have collected a petition with 395 signatures

We have collected 289 signed by residents Objections against the above letters and still are still collecting.

If you read nothing else about this, please read the few important objections enclosed in this pack and ask a few questions!

We are committed to finding a solution to our energy needs for the long term, so

Alexandra and Ainsworth Estate
Tenants and Residents' Association

Planning Applications
2024/0091/L
2023/5338/P
2023/5339/P

Type of comment: **OBJECTION**

This TRA is the recognised body representing all tenants and leaseholders.

We have consulted residents individually and collectively including by:

- leaflet drop
- general meeting
- drop-in sessions
- a petition signed by **350** people (so far) saying NO and 289 individually signed letters objecting to the proposals
- 1 on 1 meetings
- doorstep conversations

The main concerns raised by residents are (In order of importance):

LISTING CONCERNS

- Extensive, irreversible harm to the Grade II* listed interiors of all 520 dwellings.
- Extensive, irreversible harm to the Grade II* listed exteriors of Block A and Block B.
- Schizophrenic attitude to heritage: the need for insulation has been discounted on "heritage" grounds but heritage concerns are ignored when it comes to the destruction of the interiors.

TECHNICAL CONCERNS

- The proposed new system is expensive and high-maintenance and is not in line with climate change objectives (despite what the engineers say). A more sustainable, simpler, less disruptive alternative must be considered.
- Condensation and black mould is a major issue, but is not even mentioned in the applications.
- Concerns about the health risks that would arise from the proposed potable water system.
- The proposed system is retrograde. We need a 21st-century solution valid for the coming 50 years.

CONCERNS ABOUT QUALITY OF LIFE/DISCRIMINATION

- The disruption to the elderly, young families, and others during the works would be unthinkable.
- The internal alterations would significantly reduce the usability of the habitable rooms.
- Residents would have to redecorate and/or replace floor coverings.
- Residents' furniture would have to be repositioned or even replaced if it no longer fits.
- Circulation/fire escape pathways within the flats would become too narrow for the disabled.

THIS TRA ASKS THAT ALL THREE APPLICATIONS BE UNCONDITIONALLY REFUSED

Application for Planning Permission;
Listed Building Consent for alterations, extension or demolition of a listed building

Site Location: **Alexandra Road Estate**
Planning Application number 2024/009/L
Replacement of the existing estate-wide heating distribution infrastructure including removal redundant pipework; installation of two new sub-plant rooms: installation if cold water storage tank rooms; replacement of existing site hoarding and installation of new replacement infrastructure pipework.

OBJECTIONS: The proposed works would severely disfigure the exterior of the buildings and irreversibly damage the interior of 520 flats. Therefore this application for Listed Building Consent should be unconditionally refused.

Heritage
The heated walls, which are to be decommissioned, were expertly designed to provide uniform warmth during the winter, that was affordable and hidden. The orientation of the flats meant the summer sun kept the flats dry for the rest of the year. Social housing consideration was a fundamental part of the brief. Architect Neave Brown's design demonstrates enormous architectural vision, expertise and innovation. On completion he delivered a world famous landmark for Camden. The iconic concrete construction combined with Max Fordham's engineering skill overcame the fact that concrete is notoriously prone to condensation, damp and mould. Our estate has remained free of this during its lifetime; unlike most Camden estates,

The minute this "Upgrade" goes ahead and the distribution pipework is attached to the boilers we will be at risk. Camden intends to use the boilers until they fail yet describe the current system as "not fit for purpose" quoting repair costs of £200,000 p.a. No resident believes the boilers will last the predicted 15-20 years given Camden's repair record. Camden also has no control over gas prices. In 2023 and 2024 our heating costs rose by 318% (Camden's estimate) and show no sign of falling. Gas prices are notoriously susceptible to the slightest political upheaval. Camden is also currently under investigation by The Housing Ombudsman, *(12/12/23)* for its numerous handling issues with **damp, mould, repairs and complaint handling.**

Camden tell us we will have control and be able to turn our heating down or off. Many flats (at ground level or next to external walls and lift shafts) will be colder. The residents in these flats will pay more to heat their homes because there's no insulation planned. Turning off heating will create conditions for damp and mould. We also won't be able to turn the boilers off or on if we hit a warm spot in winter, or a cold snap in the summer. This cannot be described as control
On top of the visual and environmental damage residents' quality of life will be greatly impaired through inflated gas prices whilst the "Upgrade" is connected to the gas boilers (2044).

The boilers are not guaranteed and no contingency plan if, the boilers fail earlier than Camden's prediction. If they fail during the major works we could find ourselves with No boilers, No heated walls, no HIUs but an enormous pile of distribution pipework. Camden's proposal is not only blisteringly un-green; it is also.... **A very questionable "upgrade".**

Camden's Responses with regard to:
Listed Building Alterations
None of the following has been discussed with residents
Camden says the works will affect both the interior, and exterior structure and adds that some internal walls, floorings, and ceilings will be stripped out, but give no details. In addition contractors will be working unsupervised! During Better Homes, unsupervised workers demolished several

original kitchens "accidentally". Contractors will also be trying to make a profit. Two pilot flats took 10 weeks over 6 months in unoccupied flats. Camdens says the "Upgrade" work will take 10 days in a fully occupied flat. How is this possible?

Planning Consent - Camden appears to have started already: an original kitchen (83a Rowley Way) has just been stripped out and replaced with a differently configured kitchen.

Trench Heaters - The application says the plinths will be used for trench heaters, involving a metal grill the length of the surface. A Capital Works Manager says this is not going ahead.

Vehicle Parking - Listed Garages, (22 in all) have been "given over" to large cold water storage. Garages have already been broken into. Where are the Service agreements, dB levels for pump noise, and Health Inspections and Reports. Planning Consent is not yet granted!

Environmental Impacts - Water management and Foul Sewage
There is no intention to install: a Sustainable Drainage System;, re-use grey water; recycle any demolition or construction material: or harvest rainfall. Surface water with all the building contamination will be drained into the main sewer and Foul sewage will be disposed of by "other" or "unknown" methods.

Biodiversity and Geological Conservation - The Listed Estate surrounds a Grade 2* listed Park and communal areas within a Conservation Area, which is open to the public. The whole area will be a building site for years.

Emissions - No figures have been provided to demonstrate that NOx, Particulate matter or Green house gas emissions will be within government guidelines or better.

Green credentials - Camden does not intend to mitigate fuel costs in any way by installing: an on-site community-owned energy generation; no Heat Pumps; no Solar Energy; no Passive Cooling Units and no green roof or anything else to offset the impact of this proposal. Camden's Urban Greening Factor is entered as 0.00!

Summary - Residents have not been consulted over this Heating "Upgrade". We have just been told what Camden intends. We have had no opportunity to question their proposal. We have told them we dont want it several times. We still have far too many questions that have never been discussed let alone resolved.
Camden says "We explained the project to everyone" No they have not! There are still very, many residents who have no idea what is planned and many who, because of language barriers, cannot reply. We urge the Planning Committee to halt this proposal immediately. The effort and cost required to ensure these boilers last until 2044 is disproportionate. The proposal will also saddle all residents with totally unreasonable heating costs for 15- 20 years along with two lots of Major Works costs for leaseholders. There is no sense in, or justification for, this proposal.

Mrs Brady
Historic Buildings and Areas Inspector for Historic England
4th Floor, Cannon Bridge House
25 Dowgate Hill
EC4R 2YA

26th of February, 2024

Dear Mrs Brady,

I am writing to express my disappointment with your response to the proposals to carry out works to Alexandra Road Estate, Application No 2024/0091/L.

I would like to take this opportunity to address some of the points you address in your letter to Ms Quigly at the London Borough of Camden in which you advise consent for the application to build 'as you think fit'.

As you state in the 'Summary' of the advice you give in the Historic England Advice, the Alexandra Road Estate is one of the best examples of innovative social housing, and has been noted for its 'high-quality, high-density' housing. It is for this reason that Historic England gave the estate its Grade II* listed status in 1993. At that time, Camden Borough Council (CBC) were proposing renovations that fell short of these remarkable exemplifications of outstanding design and thus the listed status halted CBC from significantly harming its impact as a milestone in UK architectural design.

As you must by now be aware, many hundreds of residents and leaseholders on the estate have commented on the proposals to refit the glazing and heating system. Some of these residents have shown, often in detail, that these proposals would harm the integrity of the Alexandra Road Estate, but your advice to Camden Council does not seem to take any of this into account. This is deeply surprising. Why not? Especially, as climate change is high on the agenda.

This proposal does not, as raised by many estate residents, contribute to mitigating in favour of climate change. It in fact does the exact reverse, it adds to the problems of climate change as I will show here. I am afraid that using climate change as a reason to shoehorn in additional planning permissions, is naïve at best, but at worst, may be interpreted as an exercise in object cynicism.

But let's take a closer look at the points you yourself raise and see if we can't share with you some of those comments made by residents concerning the issues surrounding the application for planning permission made by CBC.

1. The thermal upgrade to existing timber framed windows, plywood ventilation, etc (application 2024/0286/L).

The vacuum double glazing has been looked at extensively, not only by residents but by firms in the glazing industry, who have confirmed that this material is completely unsuitable to add to the existing timber frames. The original panes of glass were in fact 3mm and were then increased to 4mm. The proposal would increase these panes to 6mm, not including the vacuum space. Therefore, they certainly would not be 'thinner' as stated in your letter? In addition, the material these panes are made from is unfit for purpose. It's far too brittle, and easily breaks and is extremely expensive to repair. It is also sourced from China with ensuing delay to reach these shores. There are no benefits to mitigating climate change. It's wasteful, unworkable and will leave its respective carbon footprint!

I would also like to say that you are entirely correct when you say the timber frames are in need of general repair. This is because these frames have not had maintenance - not a lick of paint - since they were installed more than twenty years ago. And this is one of the main issues with Camden Borough Council, they will do major works, tendering out contracts that run into millions of pounds, but will then not carry out maintenance or even get their contractors to guarantee major works (In 2011, we took LBC to a leaseholder evaluation tribunal where we demonstrated this through documentary evidence, unfortunately our evidence was not permissible within the remit of the court's processes, nonetheless we did go on to win a significant rebate on the works).

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

Now onto the question of the distribution pipes, or heating infrastructure, which you have unfortunately categorised as 'minor changes.' Beginning with the 'water storage' tanks, which you have said need an upgrade. What you have failed to enlarge upon is that the proposal, which I must insist is in no way minor, involves gutting 22 garages under block B. These will then have two water tanks installed in each. This is because in order to achieve the correct hot and cold-water differential, water will need to be pumped to the Heat Interface Units (HIUs). Instead of Thames

water supplying us with mains water pumped to our roof-top storage tanks, and maintained by them, we will now have to rely on LBC to maintain these. Of course, in terms of climate change this completely negates any of the supposed benefits of the whole scheme, and this is before you factor in the noise, and the disruption to residents and loss of storage. You will then have electrical pumps that also need to be maintained, pumping water and all the ancillary service upkeep that this entails. Frankly, there is nothing wrong with the existing fibre-glass storage tanks on the roofs run by Thames Water; so adding another tier of complexity is once again negating environmental conservation.

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

Yes, Max Fordham, whose company Max Fordham Associates installed the coils, did identify that some of the tails (your words: connection points) of the coils were difficult to reach and suffered from corrosion, but he also suggested that using diamond cutters to access them would pose no serious challenge to those skilled in that trade. Diamond cutters will have to be used extensively, anyway, under the current proposals (the twenty-two garages come to mind!), so what needs to be done is straightforward enough: extend the pipework beyond the tails, or where that cannot be achieved, chase around the couplings using diamond cutters to get at the tails and to upgrade. This has all been documented and it would be my pleasure to provide the relevant document if you so require.

And this brings us to heat control. Ninety-five percent of leaseholders and over seventy-five percent of residents have already shown in their comments and petition signing that they are not moved to have heat control. Why? Because gaining unitary control, individually, in each flat is not how the heating system was originally set up, or designed to perform in the first place - as a social housing project. And this is a key point in terms of heritage and in terms of the environment. The heating system is integral to the design of the whole as it relies on the 'warm structure principle' in which there is heating and ultimately energy equality for all. The moment you unitise the system, divide it into parcels, you compromise the benefit to the whole as some flats will not be able to run heating to save on costs. The repercussions of such a contrary application of basic principle will mean that the building will begin to be heated unevenly, leading to humidity, condensation and eventually mould.

In conclusion, I have read carefully through your letter and am not a little disconcerted that you have missed so many key elements of the arguments that have been made by residents against the planning proposals put forward by LBC. Like you, I believe that minimising the impact of climate change is critical, but that these proposals in no-way mitigate the impact on the climate.

Running pipes up the fins of the A block and on the sides of B block will also change the aesthetic of the Alexandra Road Estate, without there actually being any significant improvements: the building will suffer from not being evenly heated throughout.

Finally, the disruption to us all will be considerable; notwithstanding, the impact on the environment. You do not mention that we will lose floor space to accommodate the pipework proposed (you say, 'adapted' behind skirting, but the plans show a 30cm extension: that's not a 'void' space and no-one wants their furniture cut to accommodate any of this, anyway), or that the decking on the upstairs floor will be raised and extended to accommodate a noisy switching on/off HIU, nor do you seem to acknowledge or show any awareness that this has all been done previously, and disastrously, on Whittington Estate where it failed dramatically, forcing leaseholders to take LBC to court, who consequently agreed to repair the system, but have yet to do so.

It is imperative that Historic England preserves the integrity of the Alexandra Estate and its heating system. In the vast majority of flats, the heating system works perfectly well, the problem is that LBC have not serviced the system adequately, to 'balance out' the heating system; that is ensure it is run properly, providing maintenance engineers the right training, instead proposing spending millions of pounds installing a system that does not tackle the central issues to do with energy distribution, the boiler house, and its infrastructure and the proper insulation of exteriors.

We RW tenants and leaseholders strongly believe these proposals fly in the face of our duty to mitigate the climate crisis and will cause irreparable damage to the Alexandra Road Estate's integrity as an example of 1970s social housing, while seriously compromising the originality of the design to 'maximise flexibility' in a small space.

Yours faithfully,
Ashley Chapman
RW resident

LETTER OF OBJECTION to Planning Application 2023/5338/P and Listed Building Consent 2024/0091/L.

Site Address: Alexandra Road Estate, Rowley Way, 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.'

We wish to lodge **OBJECTIONS** to the application on the following grounds.

1.0 PLANNING PROCESS

1.1 The application is categorised as 'Residential Minor Alterations'. This cannot possibly be correct or justified.

Minor alterations are usually limited to insignificant and virtually invisible adjustments to a single dwelling NOT a strategic change to a district heating network that applies to 520 Grade 2* dwellings!

Furthermore, the alterations are not in any way minor, as explained by the application. They result in appreciable external alterations to iconic architectural features of the listed building and a fundamental change to the thermal design and performance of the structure raising the possibility of creating mould and damp within all 520 homes.

1.2 This application seeks permission for the installation of the HIUs within homes. To install the HIUs in the locations shown, much of the listed interiors will be disturbed with wardrobes/cupboards needing to be removed and replaced. No details are given, yet permission is sought to install the HIUs. This application needs to be supplemented by detailed drawings before approval is given. As noted elsewhere, there is no record of where original listed details are extant and a record needs to be made before work begins. In addition, detail of the walls and surfaces that pipework will need to be attached needs to be given.

1.3 It is not acceptable that this application should be separated from a later application for the consequential alterations to the interiors that will result from the changes to heating and hot water system. Therefore this application should be combined with 2024/0286/L.

1.4 The application includes inaccurate statements and makes overextended and unsubstantiated claims. Why are such incorrect statements included within the report? Is it to hide the extent of the work and the damage it will cause to the dwellings?

Surely unsubstantiated evidence should not be accepted as the basis on which the application should be determined.

The following are typical instances of inaccuracy and exaggeration, but they are not the only ones.

a) *'All new horizontal and vertical visible service pipework will be installed either within a galvanised housing or exposed with suitable insulation finish to protect from freezing and sit sympathetically alongside existing adjacent building fabric'. p 38*

This statement means nothing. How a galvanised or coloured metal aluminium circular pipe housing might be sympathetic to the fine concrete finish is not obvious!

b) *'The proposed new system is designed to accomodate low carbon technologies in the future'. p.16*

The application does not demonstrate how this is achieved. We note below how most of the roofs are being left in state that will hamper installation of future technologies.

c) To say that new services *'will follow existing routes'* is a false claim.

For example, in the large block A (67% of the flats within Rowley Way) the distribution pipework currently runs internally to each flat via a service duct in every alternate party wall. The proposed route for the new distribution pipework is all external, located on every other structural fin and unique architectural feature of the north side of block A.

Not only an incorrect statement but proposal that will damage the architectural merit of this grade 2* listed building. Why make such a statement if it is not really true? See item 2b.

d) The application description states the *'removal of redundant pipework'* which again is not true.

In Block A (which houses 67% of the flats) and is the largest block, the redundant pipework on the roof is due to be left in place. Why state that it will be removed if pipework serving the largest block is planned to be left? It is not a minor matter as the photographs below from the application illustrate.

Mechanical pipes located on roof of block A

Roof mount located on Block A roof

g) The claim that there will be *'lower maintenance'* is unsubstantiated and not explained. Superficially it would appear unlikely and if being used to justify the proposal it should be fully and carefully examined.

Taking into account the following:

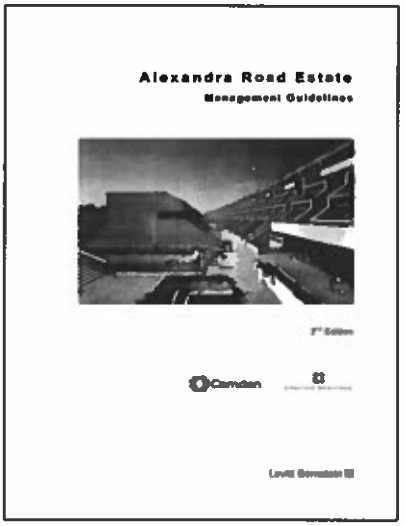
a) existing boilers remain so the maintenance will be same as now.
b) extent of proposed distribution pipework similar so similar maintenance required.
c) 520no HIUs in flats will require at least one annual visit every year. (Note HIUs have a limited life span, shorter than that of the boilers.) At the moment few visits required to individual properties as they contain no equipment.
MUCH higher maintenance required.
d) 11no new massive cold-water booster tanks, pumps and enclosures are proposed, all needing maintenance
Additional maintenance required.
e) the redundant external pipework *will* need to be maintained to stop it rusting and staining the building and stop the pipe cladding becoming a safety hazard as it falls apart.
Additional maintenance required.

f) More of the proposed distribution pipe work will run externally and much of it will be in difficult to access locations for maintenance. All pipework, especially the exposed horizontal runs will need maintenance and cleaning from bird faecal matter to stop damage and degradation of the pipework. **MUCH higher maintenance required.**

2.0 DAMAGE TO HERITAGE

2.1 Rowley Way is Grade 2* listed building. It is one of the most important 20th century examples of post war council (social) housing for rent in this country. *Only 5% of Grade 2 listings are of the quality that warrant the additional * rating.* Rowley Way is an exemplar in so many ways including the **desire by both Camden and their architects and engineers to ensure that all the residents would benefit from low-cost heating and hot water and live in damp and mould free homes.** They were not ignorant about building physics, and attitudes to insulation were very different at that time. That is the legacy we have to work with.

2.2 Questions should be asked why **The Alexandra Road Estate - Management Guidelines** produced by Levitt Bernstein and KM Heritage, signed off by Camden and English Heritage has NOT been referred to in the application.



The careful and detailed 64-page report states in Part 1.03.3 that *'The Guidelines are essentially a **Conservation Manual.'***

However, no reference is made to this document, which amongst many pertinent items specifically mentions keeping external pipework and ducting to a minimum.

How can an application be made ignoring such advice?

In the current British Standard 7913:2013 - 'Guide to the conservation of historic buildings' section 7.2.4 states the following:

'As an aid to the proper care of any building, particularly a large and/or complex historic building, a conservation manual should be prepared. This should be a permanent and accessible document containing essential information on the building, guidance on appropriate maintenance, management and housekeeping procedures, essential health and safety information and reference to the constraints to which any proposed work may be subject'.

It is necessary to ask why the applicants are not following this advice?

The Design and Access statement submitted as part of the application on page 59 also states:

'The renewal and addition of services should be undertaken in a fashion that does not harm the special architectural and historic interest of the listed building.'

The applicants are obviously aware of the advice but utterly fail to apply it. On these grounds alone we contend the application fails and seek for it be refused.

2.3 In short Rowley Way is unique and demands that exceptional care be taken to renovate it for a sustainable future.
The following are typical instances where the application fails to protect the heritage, but they are not the only ones:

a) This application seeks to **change the existing provision of a minimum temperature to unmonitored intermittent heating.**

We are all too aware of the health issues arising in homes with damp and mould and we would argue that the original thermal design principles must not be discarded, and the planners need to take this heritage factor into consideration. Without continual low-level heating to the structure the long-term existence of the estate is threatened.

To preserve the building and its heritage a different strategy is needed; one that uses green technology to provide low (running) cost background heating for the whole building. Ultimately this is likely to save the homes and save money.

The current proposal is more likely to lead to the opposite as Awaab's Law will rightly force social landlords to fix damp and mould within strict time limits. 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.

b) Not only will the heritage of Rowley Way be physically damaged by the proposal but the whole vision for a thriving supportive neighbourhood will be lost.

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 – it was not the result of ignorance or penny pinching.

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.

The principle is part of the heritage and should be respected and developed using new greener technologies now available and not swept away by a rush to individual control with the loss of universal benefit.

c) The heated walls drove the simplicity of internal layouts and gave the flats their unique uncluttered appearance.

Surely this is a material consideration in both planning and listed building consent terms?

d) **Block A – north elevation**

This is the iconic view, that thousands of people enjoy every day.

The damage to the north elevation will be considerable.

Why hasn't a CGI been produced from this vantage point?

The stadium like, concrete structure set out tangentially to a gentle curve, cradling the Block A flats above the railway line is unique. A constant rhythm along this 400-metre façade is created by the articulation of identical structural concrete fins running the entire length.

This unique harmonious composition will be totally destroyed by the proposed external silver distribution heating pipe work.

e) The application proposes that the new distribution pipe work will run vertically up **every other** concrete fin. This pipework will then be covered with bright aluminium casings destroying the homogenous architectural feature and the rhythm of this facade.

This is clearly shown by the technical drawings and CGI illustrations submitted in the application showing the unsightly pipe work somehow bathed in sunlight on a north elevation whereas it is more likely to be covered in pigeon poo.

The illustrations are misleading as they only show a view from the low-level service road. The angle of view also masks the awkward disfiguring set back at the top floor which will have a huge visual impact when seen from the public realm.

The elevation will be radically and irreversibly altered, and heritage destroyed.

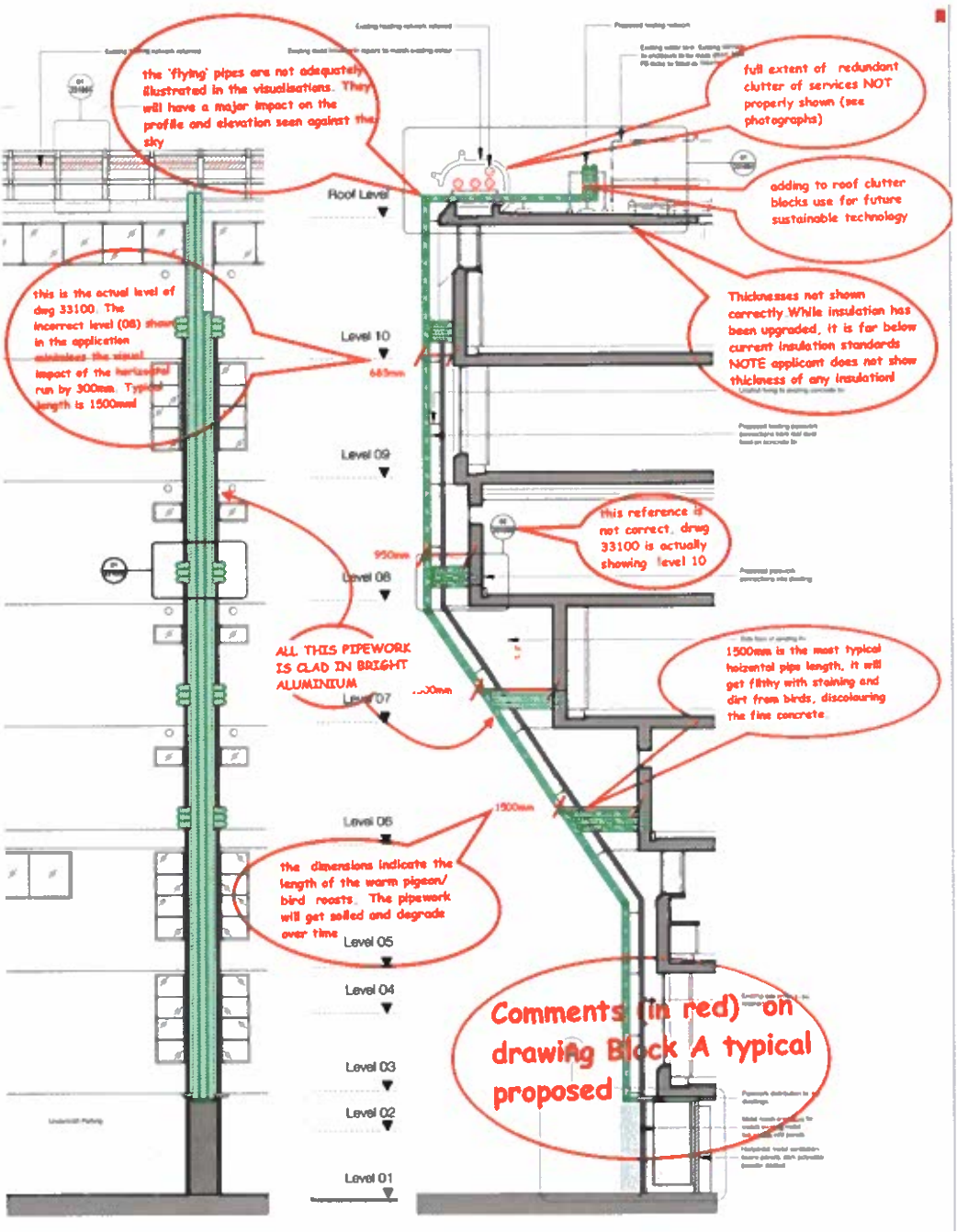
Photo of the existing concrete fins from report

Photo of concrete fins with the new proposed pipework from the report.

f) **Block A- drawing from application of the proposed distribution pipework**

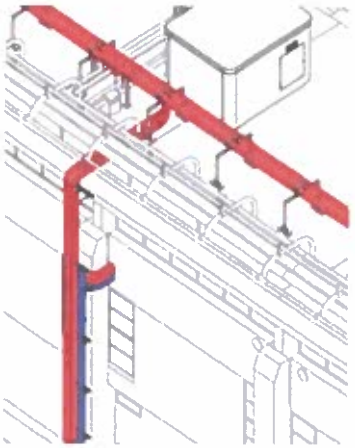
This is marked up with comments to highlight how visually intrusive the pipework will be on the north elevation as the drawings generally do not portray this adequately. For example:

- the number of pipes will make be very unsightly
- the insulation will increase their size and bulk
- the distance the pipes are off the face of the fins will make them perfect pigeon and seagull roosts
- at roof level the 'flying pipes' from every other fin to the roof will be visually very instrusive against the skyline
- all of which are minimsed in the report
- aluminium casings to pipes do not look like concrete!



g)

These are the only 3D views of the 'flying pipes' crossing over the edge of the roof on Block A. The CGI (cropped from image below is low resolution) and taken from a bird's eye view. Viewed from Abbey Road at eye level, this will be very noticeable.



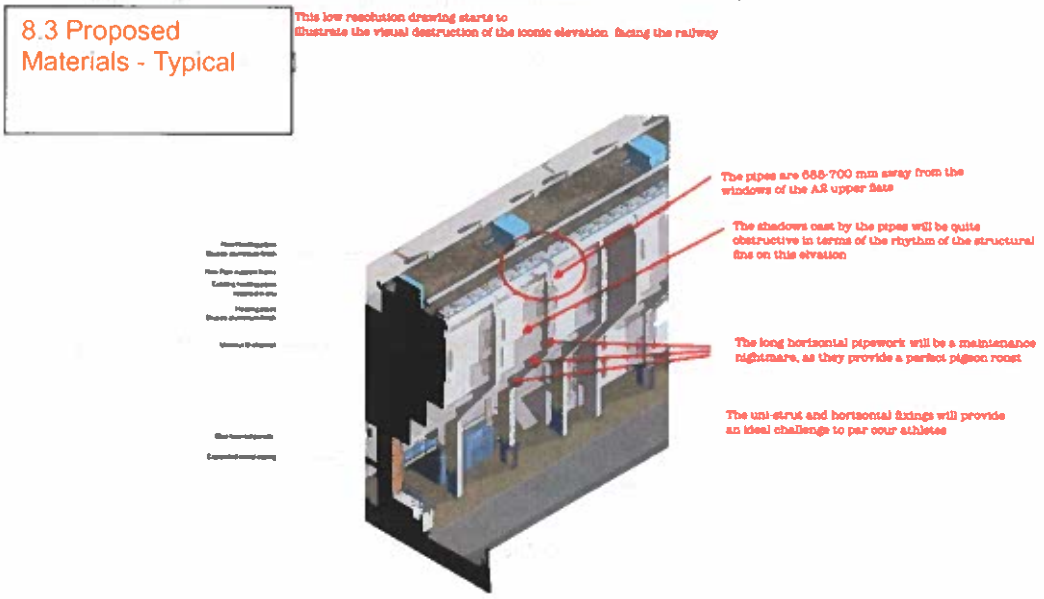
h) The applicant's Technical Report (in fig 3.6) shows that the existing pipework to Block A is 'externally visible'. However, while this is literally true in that the pipe work is visible at low level to someone walking under the building in the car parking area or on the roof! This shown in the report in figure 3.9. Claiming it is visible underemphasises and misrepresents the changes proposed. This is disingenuous.

h) **Infestation by birds/rodents**

Given the size and location of the horizontal warm pipework it will get colonised by nesting birds. The Block A situation will be much messier as there are three stacked horizontal pipes so the additional maintenance on-costs and detriment to the heritage and damage to this elevation will be greater.

Even without the droppings etc of birds /rodents, it is likely that many of the surfaces will turn green on the north facing elevation as damp sets in.

i)



j) **Bizarre decisions and statements.**

A number of aesthetic judgements and statements within the applications seem based on wishful thinking rather than a rational appreciation of the changes being proposed.

- The decision for all the pipework on the north of block A to be run as individual pipes and justified on the grounds of a conservation preference is odd. It will also be costly and be a maintenance challenge.
- The subsequent idea that if the pipes are then clad in grey coloured, aluminium weatherproof casings they will appear as similar to the concrete is riseable!
- The heritage will be damaged by the redundant distribution pipework not being removed. Being redundant it is unlikely to be maintained and therefore will rust and rot. The pipework casing is not suitable for conventional painting, it will be very expensive to maintain. (see photos in item 1.4d)
- All the existing cold-water supplies are being re-positioned on the outside of block A and B in exposed positions across the roofs which require careful insulation. This decision will also cause problems to any future roof repairs or insulation improvements.

Such 'overclaims' and 'short sighted solutions' by the applicant sound extremely dubious when used to support a proposal to deface the building.

i) **Block B – West elevation**
The proposal is to run pipework up the flanks of the block B type flats. The first block B forms the main end elevation and entrance to Rowley Way from Abbey Road. Surely this is a heritage elevation and should not be covered with distribution pipework for the heating network?

The application does not deal adequately explain why reusing internal routes was rejected (see also item 3.1 below). For both visual heritage reasons and to minimise heat loss it would appear to be a much better solution.

k) **Heritage Record for Rowley Way.**
Despite the Grade 2* listing a full record is not kept by Camden of each flat and the common parts despite their own Management Guidelines. This becomes very apparent in the detail of the planning application where many fundamental aspects of the flats are simply not known with any certainty. (e.g. hot water cylinders, which sliding doors remain, status of the listed wardrobes/cupboards that will need to be destroyed to install the HIUs) so consultants are relying on limited and incomplete information. Without a full and proper record of the historic asset, how will the works be monitored for compliance or indeed how will contractors calculate the cost to carry out the work properly?

l) There are many drawings in the submission that are not relevant and should be removed as they are not the subject of this planning application and could 'accidentally be approved'. eg drawing of a new internal pipe route behind a new skirting ref 3547-RW-M-605.

3.0 A LOST OPPORTUNITY FOR AN OPTIMAL GREEN SOLUTION

A questionable solution for the future?

3.1 The application reassures us that the proposals aim to use the existing routes. But as highlighted in item 1.6 c) above they **do not**. They propose creating new surface mounted routes generally externally but also internally.

Firstly – why state this it if is not the case? Is this to create the impression of less damage occurring due to the works?

Secondly - why not reuse existing ducts?

All existing internal ducts will need to be opened up and accessed as the report states that all the flats are to have fire stopping installed at floor level. The damage and upheaval to the residents caused by installing the new distribution routes is not likely to be significantly less than reusing internal purpose made service ducts leading directly to each flat. This

project is not some Victorian house which was never provided with service routes as part of its original features.

This appears to be a solution of dubious technical merit.

3.2 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.

3.3 The application's Technical Report on page 40 states *'it is hoped that possible future improvements to the glazing and fabric would reduce the scale of new heating emitters*.'

- How can this be just a 'hope'! Surely It is fundamental to the sizing of pipes, supply temperatures of the water etc.
- How can the design be so incomplete at this stage? For planning consent a full knowledge of the final design is needed.
- The application is far from complete, with crucial information missing, as noted below.

3.4. **Over 600m of south facing roofs not used for any solar technology!**

The application states on page 43: *'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.

Surely this is not sensible and not the way to preparing for the future and appears to be a solution of dubious technical merit.

a) The ability to use the roof spaces for future sustainable energy interventions will be more difficult and more expensive.

b) The ability to repair and maintain the roof will be hampered, more difficult and more expensive.

c) Improving the roof insulation to Block A (and other blocks) to current standards should be a priority. Leaving redundant distribution pipework on the roof, the opportunity to enhance the roof insulation at a reasonable cost will be lost.

d) There are huge downsides to not removing redundant services as they will almost certainly continue to rust and create an unsightly maintenance issue. Their presence will provide obstacles to new services and restrict opportunities for increasing insulation or locating more sustainable equipment on the roof.

e) The proposed external pipework does not appear to be very highly insulated. The submission refers to the insulation being to protect against frost, not to optimise heat retention. It would be better to keep the pipework internal on all blocks so that residents benefit from heat lost from distribution, rather than all going to heating London.

f) **Insulation**

Why are no improvements proposed to provide or improve insulation in the places where it is possble. Every guide available advocates improving the fabric first.

Surely this is not a sensible approach and not the way to preparing for the future and appears to be a solution of dubious technical merit.

g) **Additional ventilation to flats**

Currently the flats are provided with ventilation outlets powered by shared fans located in the common internal ducts to the bathrooms only. No mention is made of the additional ventilation required to make this scheme work.

Kitchens only have opening windows.

Undoubtedly to avoid the predicted issue of damp and mould, no doubt additional mechanical ventilation will be required and further changes will be sought. The current approach does not seem to have considered the issue fully appears to be a solution of dubious technical merit.

4.0 THERMAL PERFORMANCE - technical capability

4.1 In these days of high energy costs surely it would seem wise to consider the implications of **differential heating** in the properties, and what the consequential costs could be for the residents and the council.

They could be enormous!

Consider the money that will need to be continually spent on dealing with damp because next door can't afford to have the heating on, or the flat is void the time to manage complaints, the time to deal with maintenance issues etc etc!

4.2

Figure 2 : Rear of block A showing the heated party wall

This thermal image is included within the application.

This shows that heat from the heated walls travels through the fabric effectively keeping the building and the flats dry and warm with NO **mould and damp**.

The application does not propose how this heat should be kept INSIDE the flats and inside the structure. **Why not?**

Why has external insulation to walls and soffits not been considered? Rendered insulation would look much more like concrete than metal pipe casings!

4.3 The current application for intermittently operated radiators won't provide an even spread of heating through the floors or walls; wardrobes are behind most of these

external walls; the structure will become cold and therefore the external walls will get **damp and mould will occur**.

4.4 All the warm soffits are the underside of floors within flats. Currently they get adequate heating across the width of the floors due to constant heat conducted slowly through the concrete, this stops fabric temperature falling below dew-point temperature. It takes a long time for the heat to warm the structure in this way. Intermittent heated radiators will not distribute heat in this way, cold spots and **damp and mould will occur**. This result is predictable.

4.5 With the proposed metered heating some residents will have a heavy price to pay for ineffectively insulated building fabric. Currently the heating costs are divided between all residents in the individual block, based on floor area.
This is also true for flats on the lowest floors, against the earth, and kitchens with external planters and walkways over. Properties under the top roof slab would also benefit from additional insulation.

5.0 SUPPORTING DOCUMENTS ARE NOT SAFE TO INFORM A DECISION

5.1 Why are 15-year-old technical reports being used to justify the technical design solution?

Included as part of this 2024 application, is a report from The National Industrial Fuel Efficiency Service (NFSE) who were commissioned in **2002** to produce a report on the options for heating the estate. The final NFSE recommendations were made in **2009** in the report that forms a substantial part of this 2024 planning submission. Even for consultants with the best technical credentials how can this report possibly be reliable **15 years later?**

Most of the technical solutions available today (ASHP, GSHP, PV technologies and control systems) were not available or not even on the horizon in 2009.

People on the estate have been urging, calling for green, sustainable solutions to be considered for many, many years. This is so disappointing and disheartening that the only body capable of ensuring the long- term sustainable solution for Rowley Way should not be supportive of such a sensible way forward.

5.2 Paradoxically, the NFSE report advised that the option to have individual heat metering should not be pursued. That recommendation to omit the heat meters would at least be in line with the original design intent and protect the heritage of the buildings.

5.4 Information on the existing state of the heating and hot water is fundamental to defining the extent of the work needed. Camden organised a letter drop questionnaire (page 32 of the technical report) 'due to a lack of detailed survey information about the heating and hot water supply and distribution in homes' rather than gathering the information in a systematic and quantifiable way.

Subsequently 154 responses were received (out of 520) which is slightly less than 30% of residents. The document notes there was much confusion amongst respondents about how their homes were heated. What was the point of the survey and how can it be relied upon?

SUMMARY

6.0 This sub-optimal submission should be refused for ignoring heritage, not considering better, greener, more sustainable solutions in line with current best practice, government guidance and Camden's own green agenda.
We ask that the application is refused.

Gerard and Judith Ryan
- End-

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

	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', 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	**BUILDABILTY, 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.**	
	VACUUM GLAZING 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. This application proposes to fit this very expensive, novel, glass into 50-year-old timber frames of dubious robustness. Why and at what risk? 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.	

	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. 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. 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. 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. 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.) The evolution of vacuum glass has been plagued by lack of robustness[2] 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.
	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.
	All the research we have done into vacuum glass raises more concerns. [3] 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. If the glass is both expensive and difficult to get hold of how will Camden ensure that broken glass is replaced with vacuum glass? 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

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.

The vacuum glass works on the two sheets of glass separated by a **fraction of a millimetre** (0.3.mm). The little dots that hold the sheets apart are called stools.

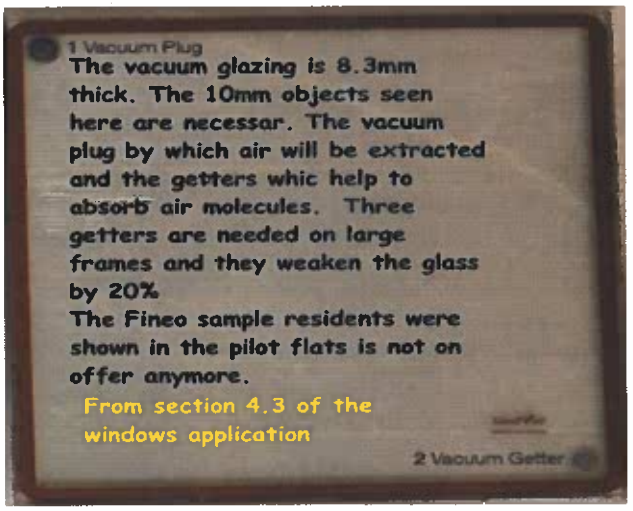
All the larger panes of glass have circular **'vacuum plugs and getters'** which are *'necessary to extract air and absorb air molecules(?)'* but they also reduce the strength of the glass by 20%.

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.

See below images from pilot flat installation and application documents:

1 Vacuum Plug

2 Vacuum Getter



RAILWAY LINE VIBRATION

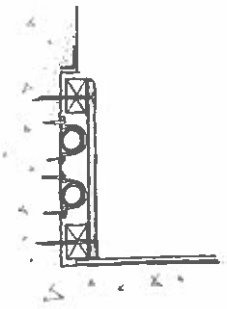
How much do the adjacent railway line cause vibration? We know that the some of the buildings have special isolating foundations, but I doubt that this aspect has been examined in terms of impact on the long-term functioning of the glass. Is it possible that the vibrations or airborne high and low frequencies 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.

Equally, in terms of acoustic performance, it would be sensible to test an analyse the glass for any unexpected consequences of the coincidence effect of same thickness glass either side of a cavity and impact on performance.

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.

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.

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.**
	We think it is fundamentally important that Camden develop a design to ensure landlord supplied background heating is provided to avoid condensation as *the existing heritage design strategy has proven so successful and still functions today.* 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. **The thermal design strategy was *'an explicit part of the original brief'* and is an intrinsic part of the heritage.** 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.
	HEALTH OF RESIDENTS AND VIABILITY OF THE BUILDING 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. 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. 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. 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.
	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.
	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. Quote from Peter Brook on the listing of Grade 2* Estate *(Conservative Secretary of State for National Heritage 1992-1994.)* The listing decision makes the involvement of English Heritage obligatory, so their officers will advise on all future phases of work on the estate. *Article in the Architects Journal - 1 Sept 1993*

	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.
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.**
	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. 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. 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 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.
	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.
	 **Proposed finished skirting board in pilot flat** Electrical trunking shown above **Concealed heating pipes at skirting level**  This does not show where the displaced electrical wiring and sockets are relocated.
	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.

	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. 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 *(see photo)* 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. 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. 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 Trellick 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? 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.
4	**NOT A SUSTAINABLE GREEN SOLUTION – all this destruction to continue to use gas boilers of unknown life expectancy**
	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? Please consider our objections listed against 2023/5338/P and 2024/0091/L as part of the objection to these applications too.
	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.
	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.

	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. It is shame that the Council is not using this opportunity to help their residents adopt green technology.
5	**BUILDABILTY, PRACTICALITY and MAINTENANCE – all underestimated, unrealistic and therefore under costed.**
	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: *'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.'* (Imagine what Buckingham Palace would like if pipes were run externally for services because it was 'difficult' to accommodate them internally!) 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!** While that disruption is taking place, new pipework could be installed. **External pipe routes would not be necessary**. Has this even been considered? Why are they not being used? Discounting an option to avoid **disruption for residents** is disingenuous and being used as a spurious argument.
	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. *(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?)* 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! 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.

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

	Please consider our objections listed against 2023/5338/P and 2024/0091/L as part of the objection to these applications too.
	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. 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. There is also a problem of insufficient hot water and kitchens and bathrooms can't be used simultaneously. (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.) 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. Please consider our objections listed against 2023/5338/P and 2024/0091/L as part of the objection to these applications too. 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. 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. 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. 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.

PILOT FLATS NOT COMPLETE

The pilot flats are unfortunately still incomplete (as the applicant acknowledges.

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.

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.

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!

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.

Again, that application was also described as signalled as 'Residential Minor Alterations'.

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.**

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.

31/01/2024 11:37	Application Form Redacted - Please refer to planning application ref 2023/5339/P for all drawings and supporting information

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:

> 'where the building fabric is improved the background ventilation should also be considered, this is to avoid future problems and unintended consequences.'

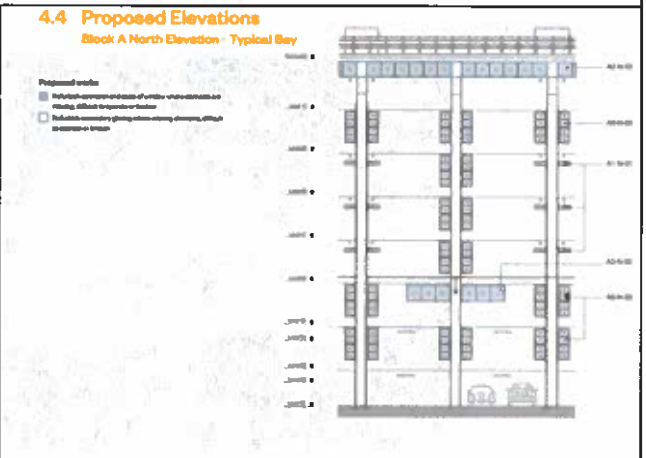
Anyone processing the application will probably take comfort from this. However, this sound advice has not been followed up otherwise we would see the impact on these second applications for Residential Minor Alterations works. A problem for the future – condensation and mould will arise.

The drawings on these applications and the earlier 2023/5338/P and 2024/0091/L do not align. For instance in Block A.

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.

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



Planning aplicatuions 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?

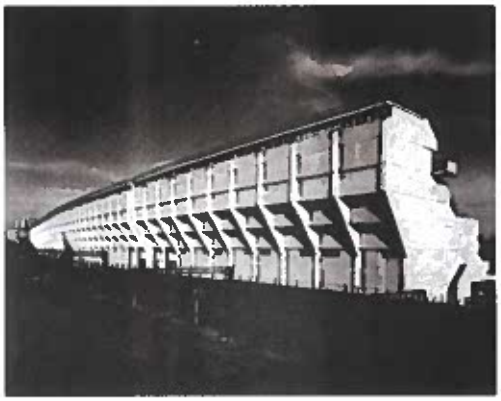
In the section titled **'Projected cost of the works'**

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'.

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.

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.

PRESESRVING THE EASTHETIC - BRUTAL , ROBUST & SPARE

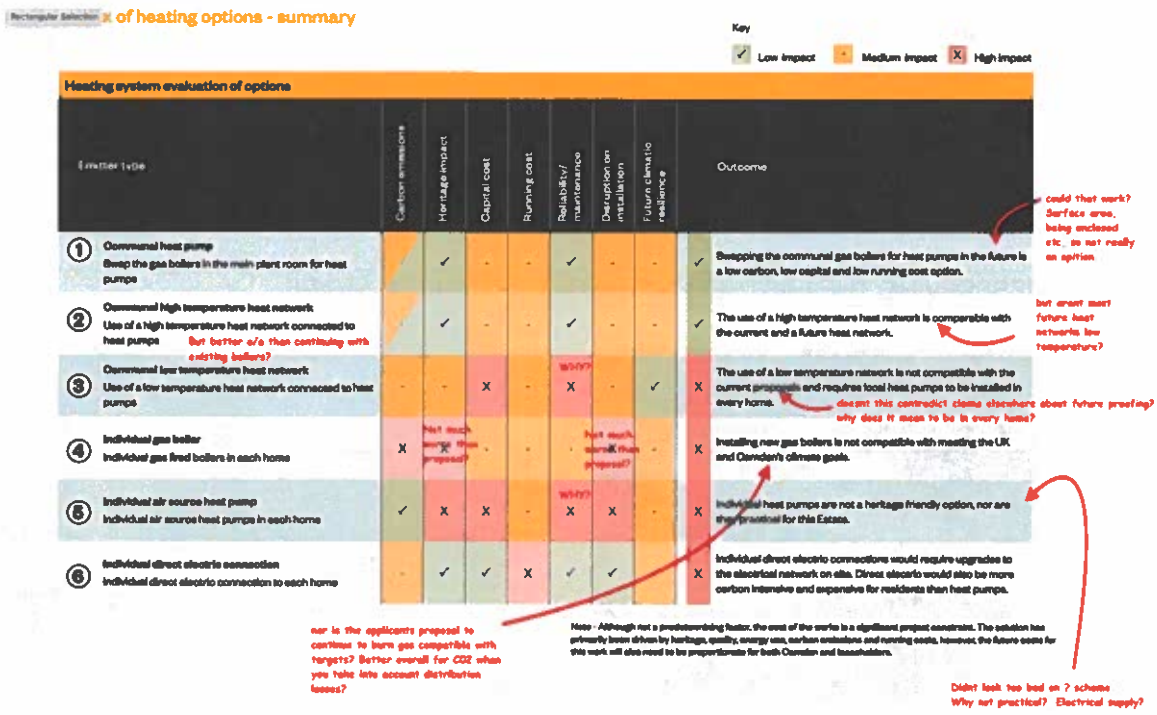


Rear Elevation Facing Train Line to the North

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.

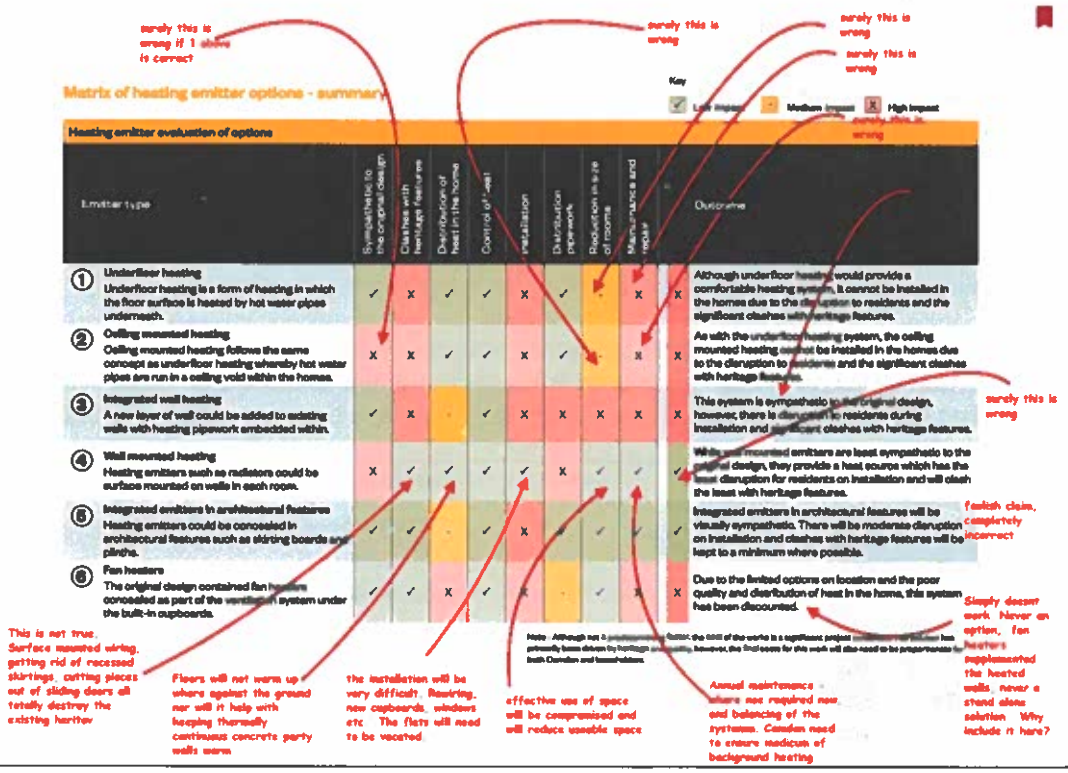
The drawings above for the current proposals which are not adequately visualised and will destroy the elevation.

THE MISLEADING MATRICES PRESENTED TO BIAS THE TECHNICAL ASSESSMENT



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.



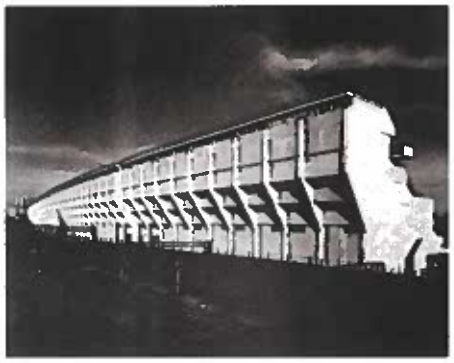
- Option 4 - while radiators may be the final choice - is fundamentally not green (ie best option) as it flies in the face of the heritage design which sought explicitly to exclude radiators.

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 elecation and yet the internal work - as proposed - depends on the external pipes shown in the prevous 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 apllications. They are still valid but have been ignored in this submision.

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

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.**

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.

11.10.3.3 **Wooden Windows Generally**

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.

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.**

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.**

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.

11.10.6.3 **Ironmongery**

General ironmongery was obtained through Beaver Architectural Ironmongery (Consortium Supplier).

Front door ironmongery was supplied with the Multisecure doors. Also refer to 11.10.3.6

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.

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

11.10.3.9 **Brush Seals and Draught Strips**

All the existing seals on joinery have been replaced with Schegel Seals and draught strips which are more robust.

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.

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).

11.10.3.8 Windowcare System

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

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Alexandra Road Estate

Management Guidelines

2nd Edition

Camden

Levitt Bernstein

Gerard and Judith Ryan