

19.3.24

Dear Elaine Quigley

I am writing to express my concern and objection to the proposal for the replacement of the heating system and associated works at Alexandra Road, as presented in two planning applications, 2023/5338/P and 2023/5339/P, and the associated Historic Building Consent applications 2024/0091/L and 2024/0286/L.

I write as an architectural historian who has written extensively on 20c housing. I am the author of *Cook's Camden: The Making of Modern Housing* (2017) and, as such, the recognised authority on the works at Camden undertaken by Neave Brown, including Alexandra Road.

Alexandra Road is internationally recognised as one of the most important housing projects of the twentieth century. It is listed grade II*.

The National Planning Policy Framework states that

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification. (paragraph 206)

The proposal, which would involve substantial harm and alteration to this heritage asset, is not supported by any such 'convincing justification'.

In fact the proposal contains so many holes that it is hard to know where to begin. To take just the most glaring:

(1) Claimed problems with the heating system

The proposal is predicated on the assertion that the heating system is broken and unsalvageable, due to problems in the distributive pipework connecting the boilers to the dwellings. But this assertion remains entirely unsubstantiated, with no details given of where/when/under what conditions these problems have occurred. So from the applications it is not possible to judge whether wholesale replacement of the pipework, with all the consequences that follow from that, is justified or not.

A report was prepared by the same consultants for the council, 'Alexandra Road Estate Heating Infrastructure: Technical Report, Feb 2020', in which one might expect to find answers. But this likewise fails to provide chapter and verse to support the assertion that the system is broken beyond repair. Indeed such information as it does provide on problems with the heating system on the estate shows that the number of call-outs has fallen year on year since installation of new boilers in 2016 (p 31), ie the problem is reducing not increasing.

Furthermore the fact that, as widely reported, the people directly affected – the tenants and leaseholders, in the form of the Alexandra and Ainsworth Estate Tenants and Residents Association – vehemently oppose the proposal does not appear to have been recognised.

(2) Loss of warm fabric

The proposal claims as a benefit that it would replace the uniform heating currently provided with a system under the individual control of the individual householder. It ignores the negative consequences, namely the loss of the warm fabric, which has hitherto prevented the emergence of condensation/mould. The original heating system with its radiant walls was designed to maintain an air temperature of 70 degrees F (21 degrees C) in the dwellings and hence keep the entire fabric above dew point. No suggestion is made in the proposal for preventing the problems of condensation and mould that could be reasonably be expected to follow the removal of this uniform heating.

(3) External trunking

As part of the new system of distributive pipework, three 120/125mm diameter pipes would be installed on the external elevations, namely on the fins of the north side of Block A and the flank

elevations of Block B. Surface-mounting of external trunking on the iconic elevations of a grade II*-listed structure is egregious and unacceptable. Characteristically no justification is given for this, eg why the internal risers (which the applicants say they plan to open to insert fire barriers at every level) cannot be used for this purpose.

(4) Introduction of heat emitters and HIUs

In place of the decommissioned radiant wall heating, the proposal is to install HIUs and radiators in the dwellings, destroying the remarkable 'radiator-free' interiors created by Neave Brown at the estate. Furthermore these radiators are sized on the basis of the current boiler-fired system. But elsewhere the proposal speaks of replacing the gas boilers with some more eco-friendly heat source (a heat pump) in about 15 years. But no consideration is given as to how this projected change will affect the design of the heat emitters in the dwellings: ie what reason is there to believe that emitters adequate for a gas-powered system will also be adequate when the power source changes?

(5) Windows and vacuum glazing

Characteristic of the cavalier manner adopted is the proposal to fit new glazing to the windows. No analysis or modelling is provided of the heat that is currently lost through the windows, and therefore of the saving that might be made (in terms of energy and running costs) by replacing them. Undeterred by this, the application proposes retrofitting vacuum glazing to the windows. Vacuum glazing is a technologically advanced (and hence costly) system; it has been in existence for many years but has never been widely used in Britain, mainly because it is the most expensive option available, costing substantially more than double, and even triple, glazing. One must therefore ask why – without explanation – it is considered the appropriate solution here. The fact that it is proposed to source the vacuum glazing from – of all places - China only adds to the Kafkaesque sense of the whole thing: what are the prospects of being able to enforce product guarantees and/or service over the projected life time of the installation from such a source? No calculation or estimate is offered of the energy demand per square metre with the new glazing installed. Furthermore, what is the evidence for thinking that such a sophisticated system, based on a vacuum gap of only 1mm being maintained between the twin sheets of glass, could be successfully retrofitted to the window frames of 520 dwellings by a council contractor chosen on price? The quality of the work at Alexandra Road under the Better Homes initiative strongly suggests the opposite.

(6) Conservation manual ignored

A conservation manual, 'Alexandra Road Estate: Management Guidelines' 2nd edition, 2006', exists, to which both Camden and English Heritage (now Historic England) were signatories. In paragraph 1.01.1 of this document it is stated that 'The parties to this Agreement undertake to use the Guidelines for Alexandra Road Estate, which are appended to the Agreement'. Yet, inexplicably, no mention is made of this defining document in the current proposal, in which this agreed conservation manual appears to have played no part.

(7) Projected cost

Even though it includes fitting the most expensive form of glazing available to all 520 dwellings, there is no indication of projected cost given in the proposal and hence no way of telling whether what is proposed is economically viable or not. The only information is on the planning portal (PP-12659528 for 2023/5338/P and PP-12660311 for 2023/5339/P) where the projected cost is stated to be 'Between £2m and £100m'. This gives little basis for confidence that proper costings have been done and hence that items proposed would, in fact, happen if the project went ahead.

In view of these absences and lacunae, the proposal cannot be said to provide 'clear and convincing justification' for the significant alterations and unquestionable harm that it would cause to this grade II*-listed group of buildings and must therefore be rejected.

Yours sincerely,

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Lately editor of *Architectural History: the Journal of the Society of Architectural Historians of Great Britain* (2020-23). My most recent book, *Housing Atlas: Europe–20th Century*, was published last year.