

From: Zoe Davenport
Sent: 25 February 2025 20:09
To: Rebecca Taylor; Sola Odusina; Planning
Subject: Written Submission for Planning Applications 2023/5339/P and 2024/0286/L
Attachments: AALG objections to Feb25 Report.pdf

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Dear Sola

Please Can you add this written submission and objection to the Planning Application for Alexandra Road

ALEXANDRA & AINSWORTH LEASEHOLDER GROUP -

Objections to revised Planning Officers Report February 2025

ITEM 3 AND 4 ON AGENDA 27TH FEBRUARY 2025
2023/5339/P and 2024/0286/L

Please could you ensure this is attached to the above

thank you
Zoë Davenport
Secretary

Alexandra & Ainsworth
Leaseholder Group

The committee meeting agenda and the Planning Officer Report (POR) states the Application proposal is for "Replacement of existing single glazing with double glazing and associated works." This is not the correct or full description of the proposals. Among the missing items we note that description of works on the actual planning application form states that the proposal is to install '**double vacuum glazing**', hence our comments.

IMPROVING HEAT LOSS

The applicant has chosen not to pursue adding insulation to roofs and soffits, for fear of objections from Historic England and the conservation lobby. Consequently, as the planning officers report (POR) Feb 2025 states:
"8.4. Upgrading the windows from single to double glazing or vacuum glass was identified as one of the main retrofit measures to focus on to have the biggest impact. But rather than considering new double glazing and frames, Vacuum Insulated Glass was chosen.

8.8. improving the thermal performance of the glass while reducing drafts was identified as the single best way to reduce heat loss."

There is a presumption that the existing 40-year-old unmaintained windows could be repaired, draft proofed and simply have the new '**double vacuum glazing**' (VIG) installed into existing frames. All this without a survey!

PRECEDENT

We note that other substantial listed modern housing schemes such as Park Hill in Sheffield and the Trellick Tower in London have replaced their original windows frames for long term heritage benefits continuing the use of those buildings.

APPEARANCE

Our existing timber large sections could be replicated with aluminium sections as the POR (Feb 2025) acknowledges in their description of the windows in:

"9.5- However, the existing windows are not delicate frames with hand-drawn glass that one might see in older listing buildings – these are large, late mid-century windows with substantial frames. In this sense, sensitively focussing the intervention on the windows, rather than the brutalist concrete exterior for example, minimises the harm and means it is outweighed by the benefits of better thermal performance."

IGNORING WARNING ABOUT EXISTING WINDOWS

The Alexandra Road Estate Management Guidelines, 2000 and the 2006 revision give important advice on the weaknesses and challenges of maintaining the existing timber windows. These documents were commissioned by Camden and Heritage England (now Historic England) and contain detailed reference to the state of the existing timber windows and their ongoing problems. Contrary to Planning Officers comments, the documents are not out of date and particularly in this regard. They contain known problems that have now been forgotten. The documents are not referenced by Levitt Bernstein despite being a co-author. Although never formally adopted, they have been used for over 20 years to assess the sensitivity of planning and listed building applications. The majority of leaseholder planning /listed building applications at Rowley Way quote adherence to those standard documents. Camden have stopped referencing them for their own projects on the estate. Levitt Bernstein recorded in a letter accompanying their 2016/2595/L HPA - Better Homes application that Camden asked for these to be removed.

Is it because the landlord, Camden, has not followed the maintenance recommendations in the Alexandra Road Estate Management Guidelines that many of the timber windows are now in a parlous state? This will make it extremely costly to renovate them. No survey has been done to guide design choices, and without fully evaluating the frames' longevity, sustainability and cost of installing '**double vacuum glazing**' (VIG) in the existing 50-year-old frames with new windows, the choice currently proposed is not a given. We want a long-term solution.

OUR HERITAGE WILL BE THREATENED

Camden would need to take even more care and maintenance of the existing, old repaired windows with the additional stress of the new heavier '**double vacuum glazing**' (VIG) installed. If approval is given, a Condition must be made that demonstrates how maintenance has been budgeted for this for the next 50 years. There is huge heritage value in using conventional double glazing in new windows in that it will prolong the useful life of the buildings providing 520 homes in Camden. Even if it were affordable to repair the existing window frames, cold bridging at frames edges will be exacerbated and could lead to internal condensation and rotting of frames. Uncontrolled ventilation losses might be stemmed for a short time, but seals in wonky windows will not last long. The existing ironmongery is at the end of its expected life span which was not designed or specified to take the additional weight of '**double vacuum glazing**' (VIG) let alone laminated '**double vacuum glazing**' (VIG) for the large sliding doors.

THE FOLLOWING FALSE OR MISLEADING CLAIMS ARE MADE – “commonly used”

The Feb 2025 report states:

*“8.5 Vacuum glass is **commonly used** in historic settings where thermal improvement is sought in a sympathetic way within existing frames.”*

'Double vacuum glazing' (VIG) is not yet commonly used. It is *sometimes* used in high end conservation projects with *much smaller* panes of glass than needed for Rowley Way. Use of 'double vacuum glazing' (VIG) at this scale with large panes of glass in a 1970's public housing scheme would be unprecedented in the UK.

WEIGHT OF THE GLASS

A thread that runs through the submission documents and presentations to residents is that the proposed 'double vacuum glazing' (VIG) glass is lighter and thinner than the existing. **This is simply not true.** Much of our existing glass is either 4mm or 6mm thick. The 'double vacuum glazing' (VIG) glass starts at 8mm thick, weighing 20kg per m² whereas 4mm glass weighs 10kg per m². So, 'double vacuum glazing' (VIG) is **twice** the weight and not as thin as the existing. A survey of the existing has not been carried out by the applicant. The proposed Fineo Laminated 'double vacuum glazing' (VIG) glass is even heavier at 40kg per m² and 16.1mm thick.

PILOT FLAT AND TESTING OF GLASS

The POR Feb 2025 states:

“12.1. The applicant has confirmed that there has been no issue with opening and closing the windows and doors in these (pilot) flats. The weight of the glass matches that of the existing single glazing and therefore there are no foreseen issues with ironmongery, hinges or sliding mechanisms.”

Many of us noted at the time of visiting the flats, that the windows of the pilot flat were screwed shut with metal straps, as the ironmongery did not work. (We have photographs). The pilot flats were also not glazed with the now confirmed FINEO laminated glass, which is much heavier. We know that only toughened glass was used in the pilot flat because of the way the glass failed when the flat was broken into.

THERMAL PERFORMANCE CLAIMS

The anticipated better thermal performance (U value) of 'double vacuum glazing' (VIG) will be significantly impacted downwards because it is being installed into the existing frames which do not have thermal breaks and therefore poor psi values by current standards. This is not acknowledged. Better to have double glazing in new sashes with proper seals that will not rack and move in old, wonky, timber frames

WHERE IS THE GLASS COMING FROM?

Following objections to the difficulty (expense, time, CO₂ and transport) of replacing broken sheets of 'double vacuum glazing' (VIG) sourced from China, Camden have confirmed:

“We are sourcing glass panes that can be ordered and installed within a short period of time. The show flats have used a product from China, but we are in talks with other providers in Europe who can provide replacement parts within a shorter time period.” (Refer Appendix No 1 attached to POR for Feb 2025.)

It was subsequently confirmed by POR October 2024 that the VIG glass will be sourced from Belgium, item 6.5.

'The applicant has confirmed that the vacuum glazing would be sourced from Belgium' – which means the manufacturer Fineo. However, the drawings listed in the draft consents all show the Chinese glass. Will the source and manufacturer of glass be Conditioned as it is currently not?

LAMINATED GLASS FROM BELGIUM

In response to residents' objections to the lack of security/breakage of the 'double vacuum glazing' (VIG) the POR February 2025 confirms:

“The proposed glass is toughened with one pane laminated and is around 4 times harder to break than standard annealed glass.” (Item 12.3).

We have made enquiries and laminated Fineo glass is 16.1 mm thick, weighing 4 times our 4mm glass and nearly 3 times the weight of the glass on our easily accessible (vulnerable) balcony doors. We know the pilot flats did not have laminated glass installed - as evidenced by the smashed glass. We do not think that the existing 40-year-old hardware - let alone the frames - will be able to support the additional weight of the laminated 'double vacuum glazing' (VIG).

COST AND LONGEVITY

The POR Feb 2025 states:

“ 5.8 Officer response: The costs of replacements and repairs are a matter between the council as freeholder and the leaseholders and tenants. The planning considerations relate to whether the proposals are in accordance with the development plan and preserve the significance of the listed building or harm is otherwise outweighed. Vacuum glass

offers better thermal performance than normal double-glazing units and so can have a bigger impact on operational carbon – a material planning consideration. See Other Issues section for further details.”

This seem short sighted for everyone but especially the Council as they own the majority of the homes (400 approx) however viability of costs **can be a material consideration** when considering Grade 2* listed buildings. At the Bourne Estate ruling (Grade 2* housing) a report was produced by expert conservation architects, Donald Insall Associates, in order to obtain listed building consent. It included justification of the benefits of replacing the windows rather than repairing and redecorating them, and that the replacement was more cost effective than long term repair and decoration as the previous windows suffered from defects including timber decay in the frames and casements and sashes.

ONGOING COST AND VIABILITY OF PRESERVING THE APPEARANCE OF OUR HOMES

To replace one square metre of Fineo Laminated VIG GLASS costs £545 per m2. Our existing thickest glass costs £50 per m2 for toughened glass. None of the above figures include supply or fixing or VAT. We have read that **‘double vacuum glazing’** (VIG) alone costs as much as new double-glazed aluminium windows per m2.

The application should not be approved until a full performance and cost exercise is concluded. With new Aluminium windows set on the existing sub frames, there would be significant cost savings plus:

- visually equivalent (sight lines) upgrade
- lower heat losses - controlled through thermally broken frames
- practical and possible solutions to ventilation requirements meeting heritage considerations
- Lower and known financial risk
- removing the risk of unknown and varying level of repair
- introduction of certainty on the critical construction path and less disruption to residents
- provides a solution that would effectively be maintenance free for 20/30 years

VISUAL COMPARISON OF DOUBLE VACUUM GLAZING' (VIG) PRODUCED BY DIFFERENT MANUFACTURERS

LandVac **‘double vacuum glazing’** (VIG) as shown to us in the pilot flats has 267 dots per m2.

Fineo **‘double vacuum glazing’** (VIG) as currently proposed has 2774 dots per m2.

Obviously, Fineo **‘double vacuum glazing’** (VIG) is visually more intrusive.

-End-