I live at Freeling House on the Hilgrove Estate and I would like to strongly object to proposals to clad Farjeon House, Dobson Close, Castleden House and Gillies House on the Hilgrove Estate with external wall insulation. (Ref: 2015/4041/P).

The planning statement says that: "*The external wall insulation works are being proposed to help meet two key public benefit commitments - **reducing carbon emissions** and **reducing the risk of fuel poverty**... "*

Reducing Carbon Emissions & Sustainability
The planning statement says that *"The National Planning Policy Framework 2012 (NPPF) sets out the Government's planning policies and how these are expected to be applied. Several sections are relevant to the proposals at Hilgrove Estate. 7.2 The NPPF It makes clear that local authorities should adopt proactive strategies to mitigate and adapt to climate change and, to support the move to a low carbon future, local authorities should actively support energy efficiency improvements to existing buildings."*

What is the expected carbon footprint of producing the huge amount of materials which will be needed to clad these buildings, transportation of these materials and other materials needed to carry out work (e.g. scaffolding) to site and of using electrical tools/concrete mixers etc to carry out the work?

The planning statement says that the cladding is made of "organic material", but not what that material is or how its production impacts on the environment.

There is no indication on the application as to how long these works will take or how much disruption they will cause to the environment.

In section 8 of London Borough of Camden's Planning Guidance on Sustainability, part 8.9 says *"Reducing waste is the preferred option and at the top of the waste hierarchy – this means the Council prefers you to prevent waste being produced in the first place rather than recycle or dispose of waste".*

The life span of EWI is given as 30 years, what happens when the cladding wears out and needs to be removed, disposed of and remade? How does this compare with the possible (unproven) reduction of carbon foot print caused by residents using less fuel?

During the application of the EWI, guttering etc will need to be removed. Will this be replaced with new guttering etc? This will again create more unnecessary waste.

Fuel Poverty
Part of the calculation of fuel poverty is based on the income of a household versus how much is being paid for fuel.

The Affordable Warmth Scheme website states that fuel poverty can be avoided by:

"Increasing household income so that fuel costs as a percentage of income falls below 10%. Unfortunately, reducing income has the opposite effect and in the recent recession many UK households have suffered a drop in real income which has pushed some into fuel poverty."

In order to complete the proposed external wall cladding, leaseholders are being asked to contribute thousands of pounds. For a lot of people this will involve taking out a loan which will need to be paid back on a monthly basis, thus cutting into their available income. This loan will become an additional fuel cost and thus, if income vs fuel costs are calculated, more people are likely to end up suffering from fuel poverty after the work has been carried out than were suffering before. A quick calculation from Tesco online bank calculates a £10,000 loan repaid over 3 years as follows (this is assuming that criteria is met to apply for and receive a loan):

Representative example

- Total amount repayable **£10,570.68**

- Monthly repayment **£293.63**
- Representative APR **3.7%**

- Loan amount **£10,000.00**

- Length of loan **3 years**
- Annual rate of interest (nominal) **3.7000%**

Also, will there be additional costs to council tenants (e.g. a rise in rents) in order to pay for these works?

The planning statement says that *"Camden...seeks to support all low income households..."*

What consultation has been carried out or what data has been used to show which households are on a low income and which are on a high income? Has an assumption been made about which types of households will be on a high income and will be able to afford a bill running into thousands of pounds?

Has the council spoken to residents to find out if their flats are difficult to heat? Maybe some flats are harder to heat than others and a surveyor would be able to find another solution for these flats rather than just blanket cladding the whole building and hoping for the best.

Consultation with the neighbourhood

The Communities and Local Governments National Planning Policy Framework, section 7 "Requiring Good Design" states:

"Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of the new development should be looked on more favourably."

"The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see. To support this, local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning."

In the section entitled "Plan making. Local Plans" it states that *"Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made."*

The London Borough of Camden has not followed this guidance from central government:

No planning notices have been attached to the front of any of the blocks concerned.
Many residents in the blocks who will be having the works done have no knowledge of the planned works.
Information has not been passed to all the residents in the neighbourhood, so they have not had a chance to comment.
The consultation period has been during the summer holidays when many people are away or unable to attend TRA meetings.
The London Borough of Camden has not respected that this estate and the surrounding area is a community and that the whole neighbourhood should have been consulted.

Lack of research and planning

The planning statement says that *"Currently the construction is such that the buildings offer poor thermal performance and therefore it is expected the residents within are generally suffering from elevated levels of heat loss, high fuel bills and general issues surrounding fuel poverty"*

This sentence contained in the planning statement shows the lack of research and consultation that has been carried out: "…it is expected that...", "generally suffering", "general issues surrounding fuel poverty."

The intended works are on a very large scale and extremely costly and, as such, a vitally important part of pre-planning should be to carry out consultation to find out: which households are suffering from fuel poverty and low income, how fuel bills and consumption compare with average bills, what the lifestyle of the residents are – e.g. do they need more heating than others because they are housebound or less because all householders are out at work during the day (criteria that the Affordable Warmth Scheme uses to judge fuel poverty). Consultation about conditions within the home which affect fuel consumption should also have been carried out, e.g. do your windows close properly?, is your boiler functioning well?, is there condensation/damp in your property? The direction a property is facing and its position in a terrace will also have an effect on fuel consumption. This planning application gives no evidence that this research has been carried out.

Apart from making assumptions about fuel poverty after no consultation with residents, there is no clear indication in the planning statement as to why the Hilgrove Estate was chosen for these works. On visiting the estates where EWI has already been carried out, it seems as though only one building in each estate has been clad and, in the case of Plender Court, only part of a building. How has this work been planned to take into consideration the local environment and architecture? How has it been ascertained that certain buildings on certain estates will benefit from EWI more than others?

Work has only recently been carried out to decorate the exteriors of Dobson Close to a high standard and electrical works are under way at Farjeon House at a high cost to leaseholders. Not only is this extremely poor planning, but it is financially unfair (and possibly illegal?) to expect them to pay for works which will be concealed by external wall insulation or to hit them with one high bill after another.

The application has been prepared with little knowledge of the estate: e.g. Farjeon House is referred to as Farejon House on the architect's plans which accompany the application.

Alternatives to EWI

The planning statement says that it wants "...to improve the energy efficiency of as many dwellings as possible".

Has it been proved that the cladding is a more sustainable and more cost effective way of improving energy efficiency than dealing with problems such as ill-fitting windows, leaking roofs and gutters, internal damp issues and faulty central heating etc? Could the money saved be spent in another way?

This report should show that it has looked at alternative ways of reducing fuel usage and making the estate more sustainable and give reasons as to why it has decided that EWI is the best solution.

The Planning statement says that *"Unlike shorter term changes to income levels and reductions in domestic energy costs, improving the energy efficiency of the home is a permanent solution to fuel poverty".* it is not a "solution" as fuel poverty will still exist for those people for whom, however energy efficient their home is, are on a low income and paying more than 10% of their income on fuel.

Design

The Communities and Local Governments National Planning Policy Framework, section 7 "Requiring Good Design" states that *"Planning authorities should not refuse planning permission for buildings…which promote high levels of sustainability because of concerns about incompatibility with an existing townscape if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits)."*

"Good Design"

The planning application has been put forward as "minor alterations". The application is for the alteration of almost the entire external part of the buildings, which (as explained by the 20th Century Society and the Camden Civic Society in previous objections to this planning application) have unique architectural features and interesting brickwork which are loved by many of those who live on or within sight of the estate and those who pass by or through the estate. As such, a Design and Access statement should have been included with the application to show how these features will be affected and why certain decisions about design have been reached (one small example is the change from black balconies to grey and the choice of silver metal).

An explanation of the following should have been included in the planning application statement:

- Why have the materials used been chosen in relation to design E.g. Is using aluminium on top of the cladding under gutters prone to leaks a good idea? Will the aluminium rust?

- How will the cladding cope with being drilled into in the future and how can holes be filled?

- What will happen to the wires which currently run along the building?

- How will down pipes be fixed to the walls?

- The report mentions that the cladding will help to resist water – is this the case for all water, or just rain water (e.g. what happen if there is a leak from the gutter or overflow pipe and water is in contact with it for a sustained amount of time?).

More informative drawings and artist's impressions in colour should have been included with the application, with specific attention given to how the utilities will be housed – e.g.

the gas pipes on Farjeon House and air extractors, in order for informed decisions to be made about whether the effects of the cladding would be positive or would be detrimental to the estate and its residents.

A colour photograph of the brick slips should have been included so that people can see what colour they will be and how closely they match existing brick work – not everyone can get to the TRA meetings or planning department to see samples of the materials that will be used (assuming that samples are available for public viewing at the planning department?).

The application statement says that "*Given the extensive consultation that has been carried out with the planning department, the carefully considered details and the high quality proposed materials; it is considered that the proposals present a well-designed and most practical solution to improving the energy efficiency of the Estate."*

On Saturday 5th September and Monday 7th September, in order to assess what "high quality" materials and "well-designed" means to the London Borough of Camden, I visited the first stand-alone EWI schemes it has carried out as mentioned in Section 5 of the planning statement. The planning statement says that *"the EWI works have been completed with distinguished success; utilising high quality materials and workmanship".*

The first thing to note is that Plender Court, Ashdown Crescent and 146 – 152 Weedington Road are rendered only and what was visible of 1 – 48 Greenwood was brick slips only with (from what could be seen) fewer architectural details than those on the Hilgrove Estate. Would it be fair to assume that the Hilgrove Estate presents a far trickier challenge with its mixture of brickwork, plaster, balconies, downpipes, walkways, windows directly under walkways and entrances with residences directly alongside?

To the untrained eye and without being able to get close to all parts of the buildings, what was visible at these buildings where EWI has already been carried out, was wonky brickwork, uneven pointing between bricks, aluminium sloppily attached, unsightly large gaps between entrances and the brick slips or rendering above, patchy coloured plasterwork, large gaps at the bottom of rendering which end in dangerous, sharp corners and unattractive metal? /plastic? squares applied to brick slips (I do not know why – maybe concealing trunking boxes?). Doors or surrounding areas have not been upgraded and some original brickwork (which looks nice and well-built) has been left exposed which means the overall design is not harmonious. As it is possible in places to see the old and new alongside one another, the quality and design of the recent work is brought into sharp contrast with the original superior quality of the design and build.

Photos of 1 – 48 Greenwood, 146 – 152 Weedington Road, Ashdown Crescent and Plender Court have been sent alongside this document.

As seen at 1 – 48 Greenwood, there is a large gap above entrance before the EWI begins. How does this affect the performance of the EWI and, with so many more architectural features to consider, (e.g. balconies and walkways), are there going to be a lot of gaps above, around, underneath etc or 10cm thick over or underhangs where different architectural features meet? How has this been taken into consideration when designing

the new exterior for the buildings on the Hilgrove Estate? It is not clear from the architect's drawings enclosed with the planning application or the planning statement and is difficult to envisage.

As seen at 146 – 152 Weedington Road, there are sharp corners by the entrance to the block where the EWI rendering buts up against the steps. Not only is it unattractive, but it is also potentially dangerous, particularly for the elderly and children. What steps have been taken when considering the design, to ensure there are no similar sharp corners, particularly at shared entrances and walkways which are in continual use? Presumably it will always be necessary to have a gap at the bottom of the brickwork or plasterwork to ensure that moisture cannot penetrate upwards?

Some of the photos of Plender Court show how the render which has been applied in the communal bin area is not fit for purpose and has already severely deteriorated.

Section 10 of the Communities and Local Government National Planning Policy Framework states that local planning authorities should "*design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts".*

The planning statement does not satisfactorily address how the plans will adversely affect the visual appearance of the buildings or visually impact on the area in general. E.g. the current style of the buildings and brickwork are in harmony with the buildings on the Eastside of Finchley Road.

In addition to design impact, the points listed above also point to poor workmanship and materials and the questionable longevity of cladding buildings which are in constant use by a large volume of people. It is all very well to say that work and materials are under guarantee (as is stated in the design statement), but, as seen in the attached photos, especially in the communal bin area in Plender Court, recent EWI work already requires maintenance. Also, calls about repairs to the cladding will need to be processed, alongside claims on the guarantee and liaison with the company who installed it. Scaffolding will also need to be organised in some cases. This will add to the workload of the repairs team.

It is also a concern that EWI will cause an area to quickly look shabby and poorly cared for.

Well-being

The planning statement mentions that the cladding may improve the well-being of vulnerable residents.

In the Communities and Local Government National Planning Policy Framework, section 8 "Promoting Healthy Communities" states:

"The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people"

"..will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development"

"establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit"

"respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation"

"are visually attractive as a result of good architecture and appropriate landscaping"

"*Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness."*

"Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions"

Currently, the architecture of the estate is harmonious and distinctive, with soft natural-looking brickwork and clean lines, creating a peaceful -looking environment for the residents. It is part of the local character and distinctiveness of the area. Cladding would change the look of the estate to the detriment of the residents and the area in general. At the moment the people living on the estate take care of it because they like how it looks and take pride in how it looks. If it is changed so that architectural features are lost and the harmony of the building style taken away then it is likely to change the way the residents feel about it and their pride in their surroundings will diminish and they may be less inclined to take care of it.

There is no indication on the application as to how long these works will take or how much disruption they will cause to the well-being of residents.

For some vulnerable residents the view from their windows may be the best part of their flat and yet for some properties the proposed work will reduce light coming into properties and the view out of it.

Disruption caused by works

In order to carry out the works to a high standard, everything that is attached externally to the walls will need to be removed. In the case of the Hilgrove Estate, this includes guttering, downpipes, electrics, gas pipes, air extractors and satellite dishes. This will cause huge disruptions to those who live here and their well-being, but no mention or acknowledgement of this has been made in the planning application.

Subsidence

Section 11 of the In the Communities and Local Governments National Planning Policy Framework, "Conserving and Enhancing the Natural Environment" states that *"The planning system should contribute to and enhance the natural and local environment by...preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability..."*

I believe there have been previous concerns about subsidence on the Hilgrove Estate. The planning statement should include figures as to how much extra weight will be added to the buildings concerned and how the risk of subsidence has been taken into account.

Examples of EWI work recently carried out by the London Borough of Camden

1 – 48 Greenwood.
Pages 1 - 13

Close up showing metal/plastic fittings which have been attached to brick slips, gap above front entrance and loose wires which have been left hanging down.

Close up showing wonky brick work and irregular pointing which could allow water penetration.

Unattractive design feature. Little thought has been given as to where the brick slips should end (as in what is the normal shape of a brick), or what the shape its cut into will look like once applied. The aluminium on the left does not appear to go right to the end of the slips.

Irregular brickwork – both in terms of how they sit horizontally and how they sit vertically. No-one has bothered to remove plastic from aluminium (?) sheeting.

Gap between brickwork and side aluminium sheet. Poor finish of pointing at end of bricks.

Wonky brick work and gap between aluminium (?) sheet.

Close up of previous photo.

Self-explanatory.

Uneven brick work halfway up side wall.

Stained brick work

Unattractive design and poorly applied pointing work between bricks.

NB: One of the screw covers is already missing.

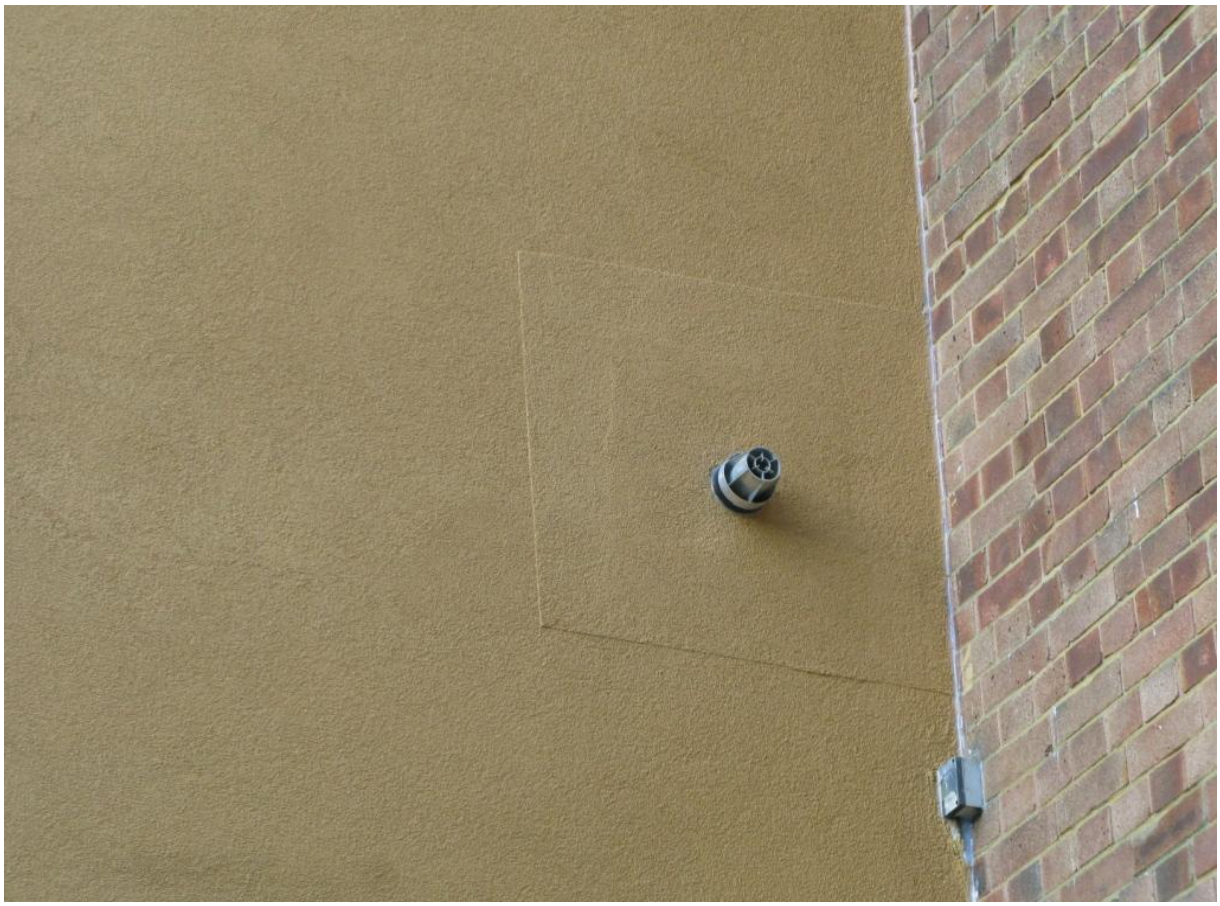
Unattractive design

Detail of the last bit of attractive old brick work with well-laid bricks which remains. This has been replaced by what has been shown on the previous pages.

146 – 152 Weedington Road.
Pages 14 - 19

146 – 152 Weedington Road

Sticking plaster effect of placing a layer of the same colour on top of another layer around extractor. Poor finishing and design means that the extractor fan is not even central to the “sticking plaster”.



Dangerous sharp edges to left of entrance. Also, an unattractive design feature.

Gap between render and entrance making an unattractive design feature.

New rendering mixed with old brick work.

1 – 42 Ashdown Crescent
Pages 20 - 24

Already showing signs of deterioration.

Detail of wall above front entrance. Not sure what this wall is made of or if done alongside recent works. Cracks in brickwork, top layer (of cladding?) coming away in parts, pointing missing in places. From a design point of view, it does not sit well with new plastering which has been carried out beyond entrance hall.

Details of wall to left of entrance hall. The top layer of the wall has come away at the bottom of the wall. Unclear if these walls have been recently clad or if they have been done previously and not upgraded when recent cladding has been done.

Details of area by entrance hall. Walls are stained. Unclear if these walls have been recently clad or if they have been done previously and not upgraded when recent cladding has been done.

Plender Court
Pages 25 - 31

Plender Court, bricked part of the building, which doesn't appear to have been clad.

Plender Court, rendered part of the building, which has been clad.

Broken plaster by communal bin area.

Broken plaster and stains by communal bin area.

Broken plaster and stains by communal bin area.

Plasterwork behind metal (aluminium?) fixture by entrance shows discolouration – rust marks?

Area around fixture at front of building is badly filled and painted which could allow moisture to enter the building.