HASC Sustainability response to planning objection by resident at Freeling House

15th September 2015

In order to respond clearly, the comments by the resident have been broken down and number. Our response is in blue.

1. Reducing Carbon Emissions & Sustainability

1.1 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?

Response: Typically the embodied energy of insulation and installation is a small fraction of the total energy saved during the lifetime of the insulation.

1.2 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.

Response: The only mention of "organic" in the planning statement is "organic based renders"

1.3 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.

Response: According to Lakehouse full works to each block will take around 6 months including preparatory and snagging stages. We have received a detailed indicative timetable for each stage of the works from our contractors to which dates will be added if permission is granted and the works proceed.

Regarding disruption to the environment, the external wall insulation (EWI) works are carried out to the exterior of the property, thus any disturbance to resident's daily routine is minimal as the contractors may not need to access homes. Appointments will be made in the event of access to individual dwellings being required. Scaffolding will be erected but will be removed once the works to the block are completed. There will be some noise disruption and dust, however any noisy work will follow Camden's contractors guidance on hours of site works, and will not start until after 8am and finish by 5pm. The contractors will minimise dust as far as possible.

1.4 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?

Response: As per the attached British Board of Agrement certificates, the insulation is guaranteed to last at least 30 years. The expected lifespan is longer based on similar projects in Europe, with an expected life of 60 years and beyond.
It is always possible for residents to use less fuel, but in a thermally inefficient dwelling there is a limit to how much this can be done before suffering from thermal discomfort and even ill-health due to cold. The external wall insulation will allow residents to take the energy efficiency savings either as thermal comfort (heating their homes to a higher temperature for a similar cost) or to use less energy (and save money) by keeping their homes at the same temperature.

1.5 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.

Response: The guttering is not removed. It is encased in a timber boxing and insulation is filled around it. An access hatch is installed for future maintenance or repairs. Please see attached method statement for a gas pipe.

2. Fuel Poverty

2.1 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%**

Response: The costs quoted to Leaseholders do not include a reduction due to ECO funding, of an average of £1,450.

The energy savings quoted in the proposal are those calculated at recent energy prices (on the Energy Savings Trust Site), they do not take account of energy price rises, which, if they occurred in line with the long term trend would increase the value of energy savings in the longer term.

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

Response: There will be no additional costs to tenants, many of which are on low incomes and at risk of fuel poverty, as are tenants of leasehold landlords who can rent their properties out at market rates.

2.3 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.

Response: Household income is a key factor in fuel Poverty along with domestic energy prices and the energy efficiency of the home. However, residents can move in and out of fuel poverty as a result of changes to household income levels.

In addition, residents change and the circumstances of one household may be very different from those of the next set of tenants. The average tenancy duration is 13.5 years, the lifetime of the insulation will be at least 30 years and possibly over 60 years. Private tenancies (in non-resident leaseholder flats) typically change more often.

There is a proven link between poor energy efficiency in dwellings and fuel poverty. Residents with uninsulated solid walled properties are more likely to be in fuel poverty than those in properties with other wall types - as the most recent Department of Energy and Climate Change report on fuel poverty states "the highest incidence of fuel poverty is found in dwellings with solid walls (16%)" (Annual Fuel Poverty Statistics Report, 2015 - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/429873/Fuel_Poverty_Annual_Report_2015.pdf).
Flats with more wall space than others than others will be colder and will benefit more from external wall insulation. The specific risks of fuel poverty on the estate, and the impacts that external wall insulation could have on this, were evaluated as part of the Re:New modelling (below).

Camden therefore focuses on the improvement of building fabric and heating systems as the most effective way of reducing the risk of fuel poverty, and improve the energy efficiency of as many dwellings as possible. Most of the heating systems on Hilgrove Estate 2 are energy efficient, see below:

- 73.9% B rated (86-90% efficient), 17% D rated (78-82% efficient), 4.5% E rated (74-78% efficient), 4.5% G rated (70% or below – these flats have been offered new boilers but have refused access).

We do have a targeted fuel poverty alleviation scheme in our Well and Warm service, which provides home energy visits to vulnerable people and some low cost measures.

However, to make a significant improvement in energy efficiency, major changes are required to the building fabric of our most energy inefficient blocks, which are the solid walled ones. We have already insulated the vast majority (95%) of our cavity walled properties and are currently insulating the remainder.

3. Consultation with the local neighbourhood

Response: The consultation process at Hilgrove Estate 2 is detailed below:

- Initial letters regarding the proposed works were sent to all residents on 15th June 2015 from Camden's HASC Sustainability Team.
- HASC sustainability team attended the Hilgrove Tenants and Residents Association meeting on 14th July 2015 to discuss the works.
- An open meeting for all residents was held Wednesday 12th August 2015.This was followed by the statutory leaseholders' consultation meeting.

Full contact details for the HASC Sustainability Officers - Andrew Lovern and Saima Iqbal - were given in letters distributed to residents, dated 15th June and 30th July 2015 and the aforementioned officers have spoken to several residents on the telephone and also visited residents at home.

4. Lack of research and planning

4.1 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.

Response: As mentioned above, we have a targeted fuel poverty programme to advise and assist specific vulnerable people with advice and low cost measures. Some issues can be alleviated through this method; some (such as windows not closing properly) can be dealt with by Repairs. Some, such as boiler replacement (see below) are dealt with under other procedures.

However, certain types of housing are systemically more at risk of fuel poverty than others, in particular solid walled housing. For major energy saving works we do not target specific households for the reasons given previously. Wall insulation makes the biggest single and long term difference to the energy efficiency, CO2 emissions and fuel cost savings of any energy efficiency measures. Internal wall insulation is more prone to technical defects (in particular thermal bridging and interstitial condensation) and the disruption and decrease in room size mean it is unsuitable for a lot of flats and occupants.

All solid walled properties will be made significantly more energy efficient (by around 27% according to the modelling of Hilgrove Estate 2) by the application of external wall insulation.

Camden has over 16,000 uninsulated solid walled dwellings and cannot externally insulate the majority because of planning restrictions in conservation areas, ornate brickwork or other distinctive features (even though external insulation provides the best technical solution). HASC sustainability has also been advised by Planning that it would be preferable to treat collections of buildings together to provide visual coherence. Hilgrove Estate 2 was chosen as it was could benefit from external wall insulation without adversely impacting on the neighbourhood. Additionally, it is relatively low rise which reduces installation costs.

4.2 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?

Response: HASC Sustainability has worked closely with planning in order to identify the blocks which will best benefit from EWI and not excessively impact visually on the local environment. If the applicant would like to know the number of dwellings that have been rejected from the EWI process then this can be supplied. It was agreed that these blocks were acceptable for external wall insulation because either they were relatively isolated blocks visually, or measures could be undertaken to make them acceptable from a planning perspective, bearing in mind the overarching purpose of the project is to make homes more affordable to heat. For Plender Court, Camden is freeholder of one half of the block – the freeholders of the other half have been enthusiastic about getting and paying for matching EWI and were granted planning permission in May.

4.3 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.

Response: Camden's leasehold services team have stated that if the EWI works go ahead then at the Final Account, a credit will be given for the recent painting that will be overlaid with the new render (so in effect leaseholders would not pay twice for the same works)

5. Alternatives to EWI

5.1 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?

Response: External wall insulation is generally the single biggest energy efficiency improvement that can be made to a solid walled dwelling in terms of long term carbon reductions and reducing the risk of fuel poverty. It is not cheap, but it lasts for 30-60 years and in doing so helps protect a variety of residents including vulnerable people against fuel poverty, particularly if the long term trend of energy price rises continues. Domestic gas bills have increased by 172% (115% in real terms) over the last 10 years (source: average of fuel bills for England and Wales from 2004 to 2014 in "Average annual domestic gas bills for GB countries" [Table 2.3.2] - https://www.gov.uk/government/statistical-data-sets/annual-domestic-energy-price-statistics) – this is the equivalent of 10.5% per year (or 8% per year in real terms – a doubling every 9 years).

Ill-fitting windows, damp issues and fault central heating would normally be dealt with by repairs. Similarly where roofs and gutters are leaking these are usually dealt with as part of repairs, or if major roof works are required, as part of the capital works programmes. At Hilgrove Estate 2, any leaking gutters will be dealt with as part of these works.

5.2 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.

Response: Camden's stock has been modelled (from existing survey data and other energy reports) to establish its energy efficiency performance and analyse the potential impacts of different energy efficiency measures for all estates and properties across the borough. This has been performed by the Re:New support team (the Re:New programme appointed and part funded by the Greater London Authority to assist local authorities with implementing energy efficiency works). The modelling and results are currently awaiting final sign off, but they have confirmed that solid wall insulation is the measure with the biggest impact on energy efficiency, carbon emissions and affordable warmth for gas heated properties.

As part of this modelling above, the existing energy rating (SAP value and band) of the flats on the Hilgrove Estate 2 was assessed. By comparing this to the national incidence of fuel poverty, it was calculated that the current risk of incidence of fuel poverty was 12% for dwellings on the estate. Because solid wall insulation has such a major impact on the energy performance of dwellings, installing EWI would reduce this risk to 5%.

There are other measures in addition to EWI, but none have the same impact.

A range of energy-efficiency measures are considered by HASC as part of its improvements and sustainability programmes. Many cost–effective energy efficiency measures have already been undertake, for example, 95% of Camden's suitable properties have had cavity wall insulation. Other dwellings are undertaken as part of existing programmes of works, such as roof insulation, hot water cylinder insulation upgrades and heating control upgrades.

Camden also has an extensive programme of upgrading district heating systems. Individual boilers are replaced every 10-15 years, depending on the age and efficiency of the boiler, and also the condition of the units and the repair history.

6. Design

6.1 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?

Response: Materials have been chosen for their insulation properties and conformance to building regulations. We have also chosen the materials in response to feedback from Planning on designs. Aluminium does not rust

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

filled?

Response: where items are permitted to be affixed, please see attached information on exterior fixings.

- What will happen to the wires which currently run along the building?
- How will down pipes be fixed to the walls? – As with gas pipes, all downpipes will be encased in timber boxing. Please see attached information on gas pipe encasing.
- 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?).

Response: Yes this is the case for all water.

6.2 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.

Response: Please see attached information on gas pipe encasing.

6.3 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?).

Response: The final colour of the brick slip and render is subject to the Planning decision. We have made samples available at meetings as well as inserting images of previous schemes in written communications.

6.4 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?

Response: All blocks are different and present challenges. We ensure these challenges are addressed in the design consultation and planning process.

6.5 To the untrained eye and without being able to get close to all parts of the buildings, whatwas 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.

Response: There are no dates on the photos supplied. We are currently in the process of snagging ready for final handover on the following blocks.

1-48 Greenwoods

7-12 Plender Court

Ashdown Crescent

148-152 Weedington Road

We have been made aware of a number of impact damages that have been caused prior to the correct protection being in place. We expect full handover within the next 2 weeks. Please see attached before and after photographs of Greenwood addressing some of the issues stated. The after photos were taken on 11th September 2015.

7. Well-being

7.1 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.

Response: The final appearance of the building will largely be dependent on the planning department, which will consider the aesthetics and other considerations put

during the 21 day consultation period. In a recent post installation survey of residents at Kilburn Gate, 93% of respondents stated that the appearance of the block was“ a lot” or “a bit” better than before, and 86% of respondents said they were “very likely” or “likely” to recommend the external wall insulation to their neighbours in other estates. In addition, phase one of these works met with not one objection to the project, indeed freeholders of the non-council part of Plender Court opted to commission identical works to their property.

7.2 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.

Response: please see response to 1.3.

7.3 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.

Response: We are unaware of any complaints about the reduction of light caused by EWI on any existing schemes. In addition, this has not been raised as an issue on any existing EWI project.

8. Disruption caused by works

Response: please see response to 1.3.

9. Subsidence

Response: Camden’s structural engineer carried out an inspection on Friday 11th September at Hilgrove Estate 2. The inspection included the external front faces of the blocks (including the stairwells) and also the inside and outside of the stairwell to the Block (Flat Nos.37-42). He concluded that there is no current evidence of any significant structural cracking due to subsidence in the stairwells of the lower lying blocks in (25-48, 49-78) Dobson Close.

Past cracking to the front wall of Flat 38 was probably caused by the trees planted in front of the block (which have now been removed -the stumps of the trees are still visible in the ground outside the block) which cracked the solid brick wall supported on a traditional concrete strip foundation. We do not believe that there is any need, at this stage, to install monitoring studs to monitor the cracking to this wall.

The additional weight that will be added as a consequence of the insulation that is to be installed, is relatively very small. Hence, this additional load is very unlikely to lead to any *'increased hazard of land collapse and compression'*. External wall insulation to the blocks will only cover the external faces of the perimeter walls. Hence, the inside faces of these walls will still be visible and may be used to monitor

any cracking that may take place in the future (subsidence cracking of a serious nature is often visible on the inside, as well as the outside, face of a wall).