

---

**From:** Alex Fugallo [REDACTED]  
**Sent:** 08 October 2015 00:22  
**To:** McClue, Jonathan  
**Subject:** Re: Planning application 2015/4041/P: External Wall Insulation for Hilgrove Estate  
**Attachments:** JS Lewis Report Hilgrove Affordable Warmth Review Revision F 071015.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Jonathan McClue

Re: Planning application 2015/4041/P: External Wall Insulation for Hilgrove Estate

Further to my telephone conversation with you, I am writing to you to express my additional concerns about the proposed external wall insulation works for the Hilgrove Estate. As a resident leaseholder, I commissioned an independent third party report of the proposals for 48 -79 Dobson Close (part of Hilgrove Estate) by an advisory company specialising in the sustainable built environment, renewable energy and carbon reduction sectors.

The attached report contains an analysis of the environmental, financial and technical aspects of the proposed works. The report considers material uploaded to the planning website up to the end of September 2015. Its conclusions, summarized below, are substantiated in detail in the text of the attached report.

Given these independent findings, as well as the overwhelming unpopularity of the application with residents, it is evident that Camden Council is unreasonable in pursuing this planning application. Surely, the only rational outcome is that this planning application is rejected.

Please add this report as we discussed to the Planning Documents for this application.

Yours sincerely,

Alex Fugallo

57 Dobson Close

#### **Summary of Report conclusions:**

##### **Coherence of Proposals**

- The proposals are unclear as is the rationale.
- Contrary to the claims of the applicant solid wall insulation is an extremely expensive method for reducing CO2.

- Survey work has not been undertaken, thus the evidence provided is not site-specific and cannot be considered as a robust analysis of the project specifics. The estimated benefits are conjecture.
- The applicant states that the systems proposed will be breathable, but provide technical information on expanded polystyrene systems, which are not. This is significant in terms risks relating to internal air quality, ventilation and moisture.
- The proposals would seem to contravene Camden's own planning guidance, which requires the relocation of services attached to external walls. This is not proposed by the applicant – rather a boxing-in of services, including rainwater goods, is proposed.
- Little coherent information is provided on the maintenance and guarantees of the product and workmanship.

### **Costs and Benefits**

- The capital costs seem extremely high. Leaseholders are being required to pay £10,400 for the measures in Dobson Close, and up to £17,000 elsewhere. Per flat, the cost is even greater than the costs analysed by the EST for EWI, which were based on semi-detached dwellings with larger wall areas. Those EST costs for EWI were already extremely high compared with other energy efficiency measures. Modelling based on flawed or limited assessment mechanisms and assumptions is unlikely to provide realistic savings expectations.
- The capital cost of the project is so high that it would effectively never achieve a payback. Even the applicant's own savings estimates, which are already in question, demonstrate a payback period of 65 years. This is far beyond the 36-year lifespan that is attributed to external wall insulation under ECO, and the 30-year expected lifespan set out in the product literature provided by the applicants.
- The projected savings do not seem to account for the EST's recommended 15% comfort factor and 10% inaccessibility factor, which would take the quoted savings down to around half their original estimates. Nor do they seem to account for the actualities of the estate itself. It is quite possible that the savings are significantly overstated. More robust analysis by the applicant is recommended to be undertaken to test the claims.
- Due to the practice of recharging the costs to leaseholders, the end result is that the project is likely to increase fuel poverty, not decrease it, as the measures installed will never pay themselves back. The 'overarching aim' of reducing fuel poverty seems unlikely to be achieved.
- The overall cost-efficacy of CO<sub>2</sub> saving is very poor when considered in the wider light of marginal abatement cost curves for a whole range of technologies. The cost efficiency is estimated at an average of £395/tCO<sub>2</sub> saved, which is extremely high. As a comparison, the capital cost of PV would equate to approximately £160/tCO<sub>2</sub> based on a 25-year lifespan, and this is without the saved electricity costs and any pseudo-public subsidy through the feed-in tariff.
- The use of public and pseudo-public funding through ECO and Camden Council for such a high marginal cost funds raises questions over whether money is being effectively spent.
- As a proxy, the project would not meet the Golden Rule that formed part of the Green Deal, i.e. a requirement to make a financial payback within 25 years – basic analysis shows this is likely to be closer to 65 years using the applicant's figures, and likely higher due to the issues set out in this report.

## Longer Term Risks

- The technical analysis and energy modelling undertaken to justify the scheme seems to be over-simplified and lacking in robust evidence to support the claimed benefits – this means that the poor cost performance may be even worse.
- No use of comfort factors or inaccessibility factors is in evidence.
- Thermal bridging and evidence on actual thermal performance of brick walls does not seem to have been fully accounted for, and it is further understood that no specific surveys of the dwellings in question have been undertaken, meaning that performance estimates are generic.
- As a result likely CO2 savings are likely to have been over estimated by a factor of two, and as a result, the already minor cost savings to residents are also likely to have been similarly over-estimated.
- There are technical risks to the works, particularly for solid brick building elements, and the lack of building-specific surveys and detailed analysis raises concerns about the approach taken.
- Timescales for undertaking the works are not clear, but there are concerns that a desire for prompt commencement could be at odds with clear system recommendations to avoid adverse and cold weather conditions.
- Not all detailing seems to follow best practice and may create risks leading to future problems – in some cases this can also apply to 'standard details'. In some cases it does not seem to accord with Camden's own planning guidance and the requirements set out in the supporting BBA certificates provided.
- There appears to be a risk of this project being approved before an accurate picture of the costs and benefits has been determined.