12 October 2016

Mr Robert Lester
Supporting Communities Directorate
Regeneration and Planning Management
London Borough of Camden
WC1H 9JE

Dear Mr Lester,

Re: Application Ref: 2016/4457/P: Objection To Proposed Replacement Of Horizontal Aluminium Sliding Sash Windows With Polyester Powder Coated Aluminium Casement Windows

Please find attached 6 letters of objection to Planning Application Ref: 2016/4457/P from the following residents of 1-19 Millman Street/Place WC1N:

Ian and Celia Pett, 2d Millman Street
Michael and Mary Kane, 6d Millman Street
Feri and Susan Shahbakhti, 8 Millman Street
Adele Smith 12c Millman Street
Pippa Hughes 2 Millman Place
Arie Greig 19 Millman Place

You have already received an electronic copy of the same objection letter from ourselves and from Mr Bill Murray of 7 Millman Place.

Yours sincerely,

[redacted]

[redacted]

Ian and Celia Pett
2d Millman Street
WC1N 3EB

11 October 2016

Mr. Robert Lester,
Supporting Communities Directorate,
Regeneration and Planning Management,
London Borough of Camden,
Town Hall,
Judd Street
London WC1H 9JE

Dear Mr Lester,

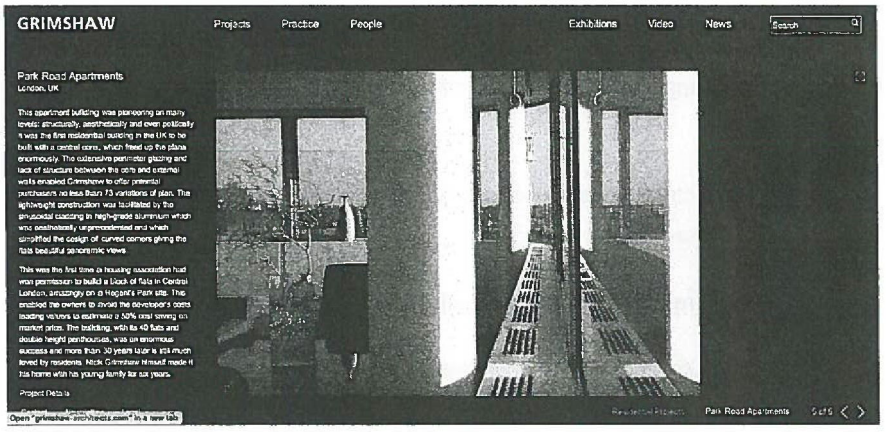
RE: APPLICATION REF: 2016/4457/P: OBJECTION TO PROPOSED

[redacted]

https://www.architecture.com/Explore/Architects/NicholasGrimshaw.aspx

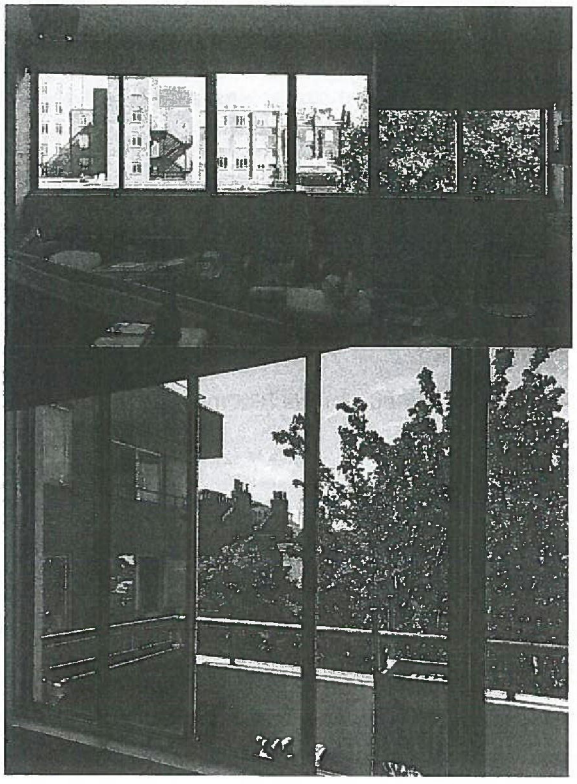
Their work was also featured in a 2014 BBC television series 'The Brits Who Built the Modern World' (https://en.wikipedia.org/wiki/The_Brits_Who_Built_the_Modern_World)

A notable feature of the buildings is the aluminium sliding windows. These are an integral element of the original design and are a 'trademark' element of Farrell and Grimshaw's work. For example, the windows of Grimshaw's iconic Park Road Apartment development in St John's Wood completed in 1968 http://grimshaw-architects.com/project/park-road-apartments/ are identical to those at 1-19 Millman Street/Place.



(Screenshot from Grimshaw website of Park Road Apartments)

See images of the Millman Street windows below for comparison.



(Windows at Flat 2d Millman Street, London WC1N 3EB)

Camden's Bloomsbury Conservation Area Appraisal and Management Strategy Report (April 2011)[2] describes the Millman Street estate as follows: 'Housing for the London Borough of Camden built in 1974 to the designs of Farrell and Grimshaw Architects lines much of the eastern side: the predominant facing material is a hard, stack-bonded red brick at upper floor level, with render at street level, lightwells with railings and a recessed fourth floor easing the skyline. Arguably, these features are inspired by elements of the traditional townhouse'. (Page 78. Section 5.185). In addition Camden's

[2] http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/planning-policy/supplementary-planning-documents/conservation-area-appraisal-and-management-strategies/bloomsbury/

2012 planning application for window replacement at 20-48 Millman Street, highlighted the sliding windows describing how *'their number and prominence make a significant contribution to the characteristic subtle elegance of this 1970s building. subtle elegance of this 1970s building'*

While the estate is neither listed nor identified as a building that makes a 'positive contribution to the conservation area', it is certainly an example of the innovative British 'modernist movement' designed by two pioneering architects who are now widely regarded as leaders in their field.

Outlining the management strategy for the Bloomsbury Conservation Area, the report stipulates that:

. *5.32 The appearance of all buildings of historic interest (listed and unlisted) within the Conservation Area is harmed by the removal or loss of original architectural features and the use of inappropriate materials. For example, the loss of original joinery, sash windows, porches and front doors, can have considerable negative impact on the appearance of a historic building and the area. Insensitive re-pointing, painting or inappropriate render will harm the appearance and the long-term durability of historic brickwork.*

. *5.33 In all cases the Council will expect original architectural features and detailing to be retained, repaired, protected, or refurbished in the appropriate manner, and only replaced where it can be demonstrated that they are beyond repair.*

The report goes on to identify specific elements of buildings within the Conservation Area that it is important to preserve, and highlights the detrimental impact that 'small scale additions' (such as 'inappropriate windows') have on the character of the area. See the relevant sections extracted from the report below:

5.38 The Conservation Area retains many diverse historic rooflines which it is important to preserve. Fundamental changes to the roofline, insensitive alterations, poor materials, intrusive dormers, or inappropriate windows can

harm the historic character of the roofscape and will not be acceptable.

5.6 Building frontages, roads, pavements and the squares are all important elements of the public realm and the cumulative impact of small scale additions can have an overall detrimental impact on the character of the area.

As stated earlier, the aluminium sliding windows are integral to the design of the estate. The appearance of the building, which is of historic interest would be harmed by the removal of this original architectural feature.

Camden's own Planning Guidance on Building Design [3] lays out good practice principles for external alterations and makes explicit reference to window replacement. As per the excerpted text below, windows are to be replaced with 'like for life wherever possible' and should match the originals as closely as possible'.

(*Page 30*) ***Good practice principles for external alterations***

Alterations should always take into account the character and design of the property and its surroundings. A harmonious contrast with the existing property and surroundings may be appropriate for some new work to distinguish it from the existing building; in other cases closely matching materials and design details are more appropriate so as to ensure the new work blends with the old.

Windows

- *Where it is necessary to alter or replace windows that are original or in the style of the originals, they should be replaced like with like wherever possible in order to preserve the character of the property and the surrounding area. New windows should match the originals as closely as possible in terms of type, glazing patterns and proportions (including the shape, size and placement of glazing bars), opening*

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3 (http://www.camden.gov.uk/ccm/cmsservice/stream/asset/?asset_id=3369897&

method, materials and finishes, detailing and the overall size of the window opening.

- *Where timber is the traditional window material, replacements should also be in timber frames. uPVC windows are not acceptable both aesthetically and for environmental reasons, including their relatively short lifespan and inability to biodegrade. Similarly, where steel is the traditional window material, steel replacements will be sought wherever possible, see also CPG3 Sustainability (Sustainable use of materials chapter), which gives guidance on the use of sustainable materials).*
- *Reference should be made to the Building Research Establishment's (BRE) Green Guide to Specification when sourcing replacement window frames.*
- *Where the original glazing bars are highly detailed and intricate, or contain stained glass or leaded panes these should be retained and repaired. See also the Camden leaflet A Guide to Windows (2006), which is available on our website, for advice on secondary glazing and other ways to improve energy efficiency while retaining attractive original features.*
- *Where windows are replaced they should have the lowest 'U-value' feasible.*
- *Listed building consent will be required for replacement windows, secondary glazing and double-glazing in listed buildings.*
- *In conservation areas original single-glazed windows often contribute to the character and appearance of the area, and should be retained and upgraded. There may however be some instances where double-glazing can be installed in a design that matches the original, for instance sash windows or casements with large individual pane sizes, or in secondary glazing. In such cases, the window frame and glazing bars of the replacement windows should match the existing.*

Camden does not appear to have considered the possibility of refurbishing the windows in spite of their own instruction in the Conservation Area Report that:

(Page 122) 5.33 In all cases the Council will expect original architectural

features and detailing to be retained, repaired, protected, or refurbished in the appropriate manner, and only replaced where it can be demonstrated that they are beyond repair.

The windows have not been maintained since they were installed more than 40 years ago. In some flats all the existing windows operate normally, but some others are problematic. Some would benefit from a spot of maintenance. We are not aware that the applicant has actually examined any windows or whether refurbishment has even been considered. Not having seen the justification for spending this enormous amount of money, in what the Council repeatedly tell us are austere times, we assume that it is in order to make good a theoretical thermal insulation shortfall between the existing type of window and a current ideal standard for new construction. We have not been told how much central heating cost would be saved but heat insulation is not much of an issue for all but the top floor flats since lower flats, particularly in Millman Place's compact cuboid formation, need only minimal use of radiators even in midwinter. Some rooms need no heating at all year round. Presumably we will be provided with the calculations when we are consulted directly by the applicant, but it seems that the trade off between the enormous cost of replacing the windows would fall far short of the central heating cost savings.

2. Quality and design of proposed replacement windows

Residents of 1-19 Millman Street are concerned about the quality of the proposed replacement windows. At the residents' consultation meeting in June 2016, residents of 20-48 Millman Street where replacement has already taken place, residents expressed their dissatisfaction to John Burton (project manager) with the installation and the powder-coated aluminium windows themselves (residents' names can be supplied on request). Specifically, they complained that the fitting of the windows was sub-standard, for instance, gaps between the walls and the window frame. They also complained that rain drips into their flats when the casement windows are open, even if only slightly and that the finish of the windows is of low quality, for instance powder coating already peeling off and window handles falling off. An additional

concern stems from the fact that in order to match the 'fenestration pattern' of the originals, the individual casement window panels are wider than usual and some residents of 20-48 Millman Street note that the hinges are already sagging, probably as a result of the excess weight of these panels.

John Burton (project manager) has stated that Camden proposes to use a different manufacture of window at 1-19 Millman Street/Place because of the negative feedback from the residents of 20-48. However, it is not possible to obtain the technical specifications of the proposed replacement windows from the planning application information on Camden's website.[4]

The design and access statement that accompanied Camden's 2012 planning application for window replacement at 20-48 Millman Street (Application ref: (Ref 2012/1802/P) cited two main reasons for replacing the windows with aluminium casement windows as per the excerpted text below:

'3) To match the exact profile of the existing windows would require the use of a specialised steel framed window system, which would result in a change of material and colour, as well as a significant additional cost: steel framed windows are typically four times the cost of a standard aluminium window and this would make the project financially unviable for the council's housing department.

4) The existing sliding windows cannot be replicated with modern double-glazing systems...'

Neither of these statements appears to be accurate:

- The frames are not steel as a simple test with a magnet demonstrates. We conclude that they are actually aluminium (i.e. the same construction as the windows of the acclaimed Grimshaw-designed Park Road Apartments mentioned earlier). Thus, the argument that an expensive specialized steel window system would be required is not

[4] http://www.camden.gov.uk/planningcomments

correct.

- Residents have been told that (by John Burton, Camden's project manager), that double glazed aluminium sliding window units are not available. However our research indicates that sliding windows of this type are widely available. The Millman Street Tenants and Residents Association has obtained two estimates for sliding double-glazed aluminium windows for one 3 bedroom flat at 1-19 Millman Street/Place. (These can be provided on request.)

The 2016 design and access statement prepared by the contractor Arcadis for the current window replacement planning application at 1-19 Millman Street states that

'Consideration was given to installing new horizontal sliding sash windows, however the sash, sill and head fenestration patterns would be significantly wider than the slimmer profile of the polyester powder coated aluminium casement windows'.

According to the measurements provided in the estimates we have obtained for double-glazed aluminium sliding units, they would only be slightly wider than the replacement casement windows and would fit within the existing window apertures.

The statement also notes that:

'The polyester powder coated aluminium casement windows are more suitable than sliding sash as they comply more closely with BS 8213-1:2004, which gives guidance on the design, construction, operation and maintenance of windows, including door height windows, for safety in use and during cleaning, including safe opening characteristics and the arrangement of window controls, to safeguard occupants and passers-by'.

We dispute the assertion that the sliding windows at 1-19 Millman Street pose a safety risk. It seems more likely that wide and heavy casement replacement windows on inadequate hinges at 20-48 Millman Street[5] pose more of a risk to passers-by. Also several residents at 20-48 Millman Street have complained that they find it extremely difficult to clean the casement windows because the panes are so wide and inaccessible.

More importantly, we consider that the original sliding window design is superior to casement windows because:

1. The building was designed for sliding window panels and has a narrow overhang at the top. This is why residents of 20-48 Millman Street complain that rain leaks in even if the casement windows are only slightly open.
2. Sliding windows allow you to choose how much to open the window by sliding. Unlike casement windows, this means you can have them open just a tiny little bit if you just want to keep some air flowing through the room, or keep the wind or rain out.
3. Because casements open outward, the edges are exposed to sun, rain, and wind. The top edge particularly is exposed and gets weather-beaten fast.
4. Casement windows are liable to sustain damage in windy weather. The casement window replacements at 20-48 Millman Street have large panes mounted on insubstantial hinges. Residents complain that hinges are already sagging.
5. For flats with balconies, casement windows take up much more room and impinge on the space. This would make the balconies effectively impossible to use when the windows are open. Also there are some flats where secondary glazing with sliding panes has already been installed at considerable expense to reduce noise from the neighbouring school playground or from the Camden Council Cockpit

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5 http://planningrecords.camden.gov.uk/Northgate/PlanningExplorer17/GeneralSearch.aspx (Ref 2012/1802/P)

Yard Waste Depot. These would not be compatible with casement windows.

We hope that this document provides a comprehensive summary of valid objections to the proposed planning application. We are not convinced by the rationales set out in the contractors' design and access statements for both 2012 and the current planning applications because both contain significant technical inaccuracies. Therefore we request that:

- Before proceeding Camden should provide proper justification for window replacement rather than refurbishment,
- If ~~there~~ a convincing justification for replacement is provided, we request that the windows should be replaced 'like for like' both in design and quality as per Camden's own good practice principles for windows[6]:

  '*Where it is necessary to alter or replace windows that are original or in the style of the originals, they should be replaced like with like wherever possible in order to preserve the character of the property and the surrounding area. New windows should match the originals as closely as possible in terms of type, glazing patterns and proportions (including the shape, size and placement of glazing bars), opening method, materials and finishes, detailing and the overall size of the window opening*'.

A final point: While not strictly relevant to the planning application itself, we wish to record the fact that residents are rather insulted by this 'consultation'. We understand that the Council is obliged to consult with us prior to submitting a planning application for major works. There has been no consultation, which makes a mockery of the so-called 'consultation process'

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6 (http://www.camden.gov.uk/ccm/cmsservice/stream/asset/?asset_id=3369897&

and reduces it to a box ticking paper relay amongst different Council departments. Eva Reynolds confirmed this sham in an email dated 21/07/16: 'Planning permission is sought early on because in our experience it takes a very long time to go through the planning process, and in order to begin the work on time we need to have planning started well in advance of when we want to begin.'

We look forward to your response.

Yours faithfully,

[redacted] ARIE GREIG
19 millman place
WC1N 3EA