

Application No:	Consultees Name:	Consultees Addr:	Received:	Comment:	Response:
2017/3593/L	Helen Bryan	30 Park Village East NW1 7PZ	22/09/2017 16:36:52	COMMNT	<p>1. I object to this application in its entirety, on three grounds:</p> <p>(i) As proposed it is not fit for purpose as it will not provide adequate noise insulation and/or ventilation, and</p> <p>(ii) It will have an unacceptable impact on the interior and exterior historic features of this Grade II* Listed Building, and</p> <p>(iii) The application is premature. There is a revised scheme being developed for the Euston approach, which HS2 have stated will have a different impact on Park Village East than the scheme accompanied by AP3 and SES 2, on which residents petitioned to the House of Commons and House of Lords. To date residents have not been informed what the noise impacts will be of any revised scheme on Park Village East, because HS2 say these have not yet been assessed. They depend on the contractors' design, and to date neither the design nor the noise impacts are known. Therefore it is as yet unclear what noise levels are being insulated against. More or less noise insulation may be required and/or it may prove impossible to provide effective noise insulation at all and affected residents will need to be rehoused. Given the current uncertainty over noise levels, this application is somewhat hit-and-miss, puts the cart before the horse and is a waste of taxpayers money.</p> <p>2. I note that the application has not been made by anyone who has ever lived in the property, or intends to live there. The application also suggests a lack of familiarity with the property, specifically in regard to the way it is impacted by noise in the surrounding area impacts it and the thermal effects from its east-west exposure. In the premises I assume the application was not informed by direct experience of living at the property but prepared on the basis of computer modelling. If so, the computer modelling is inadequate.</p> <p>3, I am in a position to comment on the application as I am very familiar with No. 34. Since 1980, my husband and I have lived two doors away from site address at No 30 Park Village East (PVE) in a similarly Grade II * Listed Building designed by John Nash. I am well acquainted with many of the Nash houses, and their characteristics., on Park Village East, but am particularly well acquainted with No 34, both internally and externally. From 1980, when my husband and I bought No 30, until approximately 1995, when the then leaseholders moved, we were close friends with the family who lived there as they had children the same ages as our own. The two families were in and out of each other's houses on an almost daily basis for fifteen years and I know every room and every window of the site address, and am familiar with its historic features, many of which are similar to those at No 30.</p> <p>PROPOSED NOISE INSULATION NOT FIT FOR PURPOSE</p> <p>4. The proposed noise insulation is to be provided to the front and side of the building only, but this will be insufficient, as anyone who lives between Nos 28 -36 and further south on Park Village East beyond the block of flats at Silsoe house can confirm. There are very large gaps between the detached and semi- detached properties, and all these properties</p>

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back directly onto the large brick buildings and concrete parking lot of the Regents Park Barracks. Residents on Park Village East, most of whom have lived here for many years, have repeatedly tried to tell HS2 and their contractors that noise insulation cannot be achieved if rear windows and doors are not insulated.

5. We all know from long experience that noise from anywhere in the street -a car alarm, burglar alarm or drilling in the street to give a few examples- produces a “surround sound” effect, with noise travelling through the large gaps between houses and reverberating off the Barracks wall and high brick buildings. Such noise is as loud in the gardens at the back of the house and internally as at the front and sides. It is impossible to tell where the noise is coming from, it’s everywhere.

6. We have also noticed after thirty-seven years of living here that noise can carry up and down the north/south “corridor” provided by the gardens to the rear, and even a children’s birthday party at the north end of PVE can, depending on conditions, be clearly heard at the southern end. While children’s birthday parties are never a problem, there have been many instances of late night parties- and I include our own- in any of the gardens up and down the street being heard as terribly loud up and down the street. We are unaware that HS2 have made any real attempts to deal with the particular acoustics

7. There has been a lack of consultation with HS2 over noise insulation. Like almost anything residents try to tell HS2, residents’ attempts to point out this problem to them and their contractors have fallen on deaf ears as HS2/contractors prefer to rely on inadequate and inaccurate computer modelling. However, contractors on site at least two other Nash properties on the street have now admitted to the residents of these properties that the computer model was wrong about the impact of noise from the rear. However, in the case of the current application there is no resident to point this out and HS2 and its contractors have signally failed to share this information when the proposed noise insulation application was drafted. Residents are left with a sense that HS2 and its contractors are trying to rush through an inadequate scheme to persuade Camden Council that HS2 is honoring its undertakings.

8. In relation to the proposed secondary glazing and the heat generated by the east/west exposure of the property, anyone who has spent time in No 34 on a sunny summer day can confirm, as I can, that the house gets very hot in full sun. With the proposed scheme, thermal gain seems likely to be intolerable, even with ventilation units. Previous occupants of No 34 left windows open front and back for a cross breeze from the garden. Since the application is not made by a resident who would know and be concerned by such things, I doubt that full consideration has been given to the problem. I know very well how hot direct sun can make our house at No 30, , even in winter, and how necessary cross ventilation is.

UNACCEPTABLE IMPACT ON HISTORIC FEATURES OF THE BUILDING

9. I note that the proposed noise insulation proposed for No 34 would be either unsuitable, impossible or both in many of the other properties on Park Village East. Individual houses

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have their own layouts, and at No 30 , the inadequate and unattractive scheme proposed for No 34 would certainly be impossible, given our large arched windows front and back, large radiators under every window save one, shutters which are necessary for security, privacy and integral to the historic character of the rooms on the ground floor, and inward opening casement windows on our top floor which becomes unbearably hot- - 30 degrees or more- in summer unless all windows are open to allow a cross breeze.

10. The effect upon the historic features of No 34 , such as the fixing of the shutters for the duration of the period the secondary glazing is required is unacceptable and not in keeping with their original purpose, to provide security and privacy to the inhabitants of the property. From the street the closed shutters look appropriate and in keeping with the architecture of the property.

11. It do not agree that the sliding windows of the secondary glazing as proposed will not be noticeable from the street. They will be a significant jarring element .

12, The Sonair units proposed for ventilation look better suited to a budget motel in Arkansas than the interior of a Nash house. They could hardly be less appropriate and look dreadful. Had No 34 been inhabited when the application was drawn up, the residents would surely have demanded to visit a similar property, if there are any, on a hot day where these units were in use to judge whether or not they would provide sufficient ventilation before agreeing to have them. Drawing on the experience of No 30 in warm weather, and the need to have almost all the windows in the house open for cross ventilation and as much breeze as possible from the garden, I query whether the Sonair units are sufficient to provide enough fresh air in such a large property.

13, I do not know what investigations have been carried out to assess the problems of condensation which affects some of the Nash properties. Many if not all the Nash houses had very thin glass in the windows and experience high levels of condensation at the windows. At No 30 we are careful to keep the house well aired to avoid damp. This must be similar at No 34 but has not been addressed in this application.

14. As for the claim that any negative or unsightly impacts on the historic character and features of No 34 are “temporary”, it invites the question “temporary as opposed to what?” An individual’s entire existence on earth can be said to be “temporary” in terms the passing of the ages. Nine years of living with unpleasant, unsightly and hot secondary glazing , and quite possibly longer given the tendency of construction projects to over run in time, may seem objectively “temporary” to HS2 but hardly temporary to anyone living in the property.

To summarize, I object to this application as premature, inadequate and unsightly for the reasons set out above. I recommend refusal of it and all applications for noise insulation until such time as the noise levels from the revised construction scheme on Park Village East have been assessed and calculated. When noise levels are known, HS2 and its contractors should be required to inform themselves of any issues pertaining to or

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characteristics of the individual properties , and in consultation with the owners, then determine whether an acceptable noise insulation scheme is possible, and if so, how to make it appropriate for the individual properties.

The current application as it stands is a waste of taxpayers' money.

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2017/3593/L	Matt Hollier (HS2 NIWG Community Representative)	6 Mornington Terrace London NW1 7RR	24/09/2017 12:21:01	OBJ	<p>Please find below comments on the application by HS2 and its sub-contractors for installation of secondary glazing in a heritage property in Park Village.</p> <p>I am supplying these comments on behalf of residents who participate in the Noise Insulation Working Group (NIWG). As you are aware, the NIWG is a forum for residents groups to meet with HS2 and its sub-contractors to discuss issues related to protecting residents from the noise of HS2 construction and operation. If these comments need to be registered in an individual's name then my name should be used, but I make the point that the comments below have had input from various community members of the group and I am submitting them on our collective behalf.</p> <p>I would also like to remind you that this application is the first of many similar that are expected and as such is a test case effectively. As such it is critical that the various issues arising are well thought through and discussed as necessary. If you have any questions on the comments below, please let me know.</p> <p>Kind regards,</p> <p>Matt Hollier 6 Mornington Terrace, NW1 7RR Co-Chair, Camden Cutting Group</p> <p>*****</p> <p>Site Address 34 Park Village NW1 7PZ</p> <p>Application No. 2017/3593/L</p> <p>General comments on drawings: The plans and sections do not show the external face of the windows within the full depth of the wall and the location of the outer face of the wall, so the context of the windows cannot be fully considered. Dimensions are missing to enable frame widths of existing and proposed to be compared and the overall size of windows to be ascertained, as are constructional details of the existing frames. In addition there are no internal elevations of the full window walls so that the impacts of the proposals can be understood within the context of individual rooms. This is particularly important in any rooms which have internal joinery (shutters and fixed panels) and where window recesses or designs occupy unusual locations, or are unique, as is frequently the case in the II* Listed Nash Villas. Whilst no. 34 does not have unusual window designs some of the other villas certainly do and it is therefore unfortunate that the test case chosen is the one where the least documentation is probably required. A precedent for not having internal room elevations etc. should not be set with this submission.</p>

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Glass to be used - in sensitive situations non-reflective and/or low iron glass should be specified so that double reflections are less of an issue and green tinges to thicker/larger pieces of glass are avoided. There is no mention of the use of these.

Specific comments:

Ground Floor Sitting Room - P2229-PVE34-00-01/02E and P

The existing internal joinery is not drawn correctly, with only the face of the shutters being shown, as if they were the face of the brick wall itself. The construction of both the shutters (e.g. number of panels / sections) and the box depth etc. is not drawn, nor the architrave that presumably covers the front edge of the shutter box. This is particularly important where it is proposed that the subframe will have to be fixed into this joinery. None of the existing glazing frames or bars are dimensioned - thus it is impossible to tell whether the proposed secondary frames will result in larger panes of glass (i.e. the new frames should be slimmer than the existing) as per HE"s guidance to minimise visual intrusion from both outside and within the interior. An elevation of the entire window wall should also be provided so that the context of these windows, with their full height window recesses, can be ascertained in the room.

The fixing of secondary glazing onto the original timber shutters, rendering the shutters inoperable, is concerning, as it will inevitably cause unnecessary physical damage to the original joinery. In addition the shutters will be exposed to different atmospheric conditions within the gap between the two windows, that is likely to cause damage over the longer term.

There is no indication of how the proposed subframe, being used to provide fitting tolerance, will be fixed into the existing timber shutters, of how the shutters will be pinned back, nor of how the boxes will be rendered less acoustically live without damage to the timbers by preventing air movement, to ensure that sound is not transmitted through them and out through the architrave (we are assuming the architrave caps the boxes in this location - although as this detail is not drawn it is difficult to tell).

The proposed use of an extended cill will form a substantial addition within the window recess which will cast the fixed joinery panels and the floor below the windows into deep shadow and therefore reduce the amount of light that is reflected around the room. The interruption of light coming into the room that presently highlights the joinery beading and panelling below the window, will result in a major change to its appearance. As these windows are a primary historic feature this is considered to cause significant harm as it will interfere with the both the proportions and original design intent of having full height recesses with joinery panels beneath the windows.

There are no details of how the proposed cill and cill support will be fixed into the existing joinery and the fixings will need to be reasonably substantial to support the weight of the secondary glazing frames and glass. The visual intrusion of this addition will be

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considerable in what is the principal room of the house.

The replication of the casement windows and fanlight in the framing for the secondary glazing does not appear to be necessary for what is not a huge window. HE guidance states at Section 4 p13 "Secondary glazing can have minimal visual impact if carefully planned. The design should seek to be as discreet as possible with small frames concealed from view from the outside and unobtrusive internally". The proposed subdivided frame does not comply with this intention. The proposed transom plus associated metal window framing with a dimensioned sightline of 126mm appears to be wider than the existing transom. The 107mm sightline of the flying mullion also appears to be at least as wide as the existing rebated casement leading edges. The proposed timber subframe to the window appears to be unnecessarily large as the windows are being individually measured and manufactured. This subframe, along with trims and the fixed angle frame housing the opening casement frames will result in a heavy and visually intrusive installation.

Externally fitted noise insulation with single panes of glass and a simple external frame within the rendered reveal depth, as per the sample at 31 Mornington Terrace, would deal with all of the problems listed above. The specification of low iron glass would remove any green tinge present. In addition an external installation would require to be Conditioned to be removed after works were complete, thus ensuring that the secondary glazing could not be retained by the owner to the detriment of the Listed building in the longer term. If it is not possible for an internal installation to be Conditioned in this way then what are unsightly and damaging proposals for the principal room could remain in situ permanently... as is noted as a risk in the accompanying Heritage Statement. This kind of fully framed secondary glazing would usually be refused for a building with II* listing so it is not appropriate to run the risk of having such a proposal retained permanently (the fitting of acoustic laminate inserts to the existing frames would be a far more appropriate solution in the normal course of events but such inserts would not comply with the Railway Noise Regulations and would not give as much noise reduction as the proposal, and we are therefore not advocating this solution in this instance).

First Floor Bedroom
P2229-PVE34-01-01&02P

Whilst there are no shutters in this room, there is a timber panel under the window and the window recess continues to the floor. The same observations about extending the cill and creating shadows applies here also therefore. In this location it may be possible to increase the specification/thickness of the laminate glass to enable the unit to be set onto the existing cill, without the need to extend it, but still achieving a similar noise reduction to having the 100mm gap between windows.

The heavy framing is also a concern. On this floor the thick secondary transom, when viewed from the road below, will be particularly visible and we would suggest that providing full height casements or, even better perhaps, vertical sliding sashes with slimmer mullions (as per basement and top floor windows) would considerably lessen the visual impact even

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though a small section of vertical frame may be visible within the narrow fanlight. The installation would also be simpler internally and therefore less detrimental to the room. Please see photographs in the accompanying comments for an installation which is similar to what is being proposed here. NB Montague Street is Grade II Listed.

Basement Floor Kitchen Dining Room
P2229-PVE34-B-01&02P

The proposed horizontal sliders are appropriate and the internal plastered reveals will accommodate the frames without further intervention required. The timber subframe dimensions should be minimised as far as possible.

2nd Floor Front Bedroom
P2229-PVE34-02-01P

Comments as for basement windows.

The proposed provision of a trickle vent in this room, and not a Sonair, will be inadequate for dealing with heat build up from solar gain through the roof, and heat in the building rising to the top floor. Far more frequent air changes will need to be provided during the night-time to enable the building fabric to dissipate heat gained during the day and to give the occupants the possibility of sleeping in the room during hot weather.

Sonair

It is proposed that this is provided with a G3 filter that captures 50 - 70% of particles larger than PM10. There is, however, an optional F6 replacement filter that captures 99% of all dust particles larger than PM10 and 95 - 99% of all particles larger than PM5. The F6 filter should be provided as standard on all buildings adjacent to the works. The proposed Sonair mounting cowl is square, however the duct is circular. A circular cowl would be preferable as it would be visibly smaller and there is no possibility of it being fixed out of line / skew.

Heritage Statement

The Heritage statement asserts that the harm being done in adding secondary glazing is not significant. It does so by suggesting that where it is significant the installation will only be temporary - whilst admitting elsewhere that it is not possible to insist that internal secondary glazing is removed once the works have been completed. No evidence is presented that original joinery is not harmed long term by being trapped between two sets of windows where heat and moisture can build up and cause shrinkage / warping etc.

Please see attached detailed comments from Alan Chandler, Specialist Conservation Architect.

The repair of render externally (particularly where it is not original as is the case for many of the buildings on PVE due to war damage) is far less of an issue than the repair of original

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joinery, and as such the use of external secondary glazing on the principal floors would be the least harmful intervention both for the building and also for the occupants (thus preserving "viability"). This unprecedented solution should be acceptable in this instance if Conditioned for required removal at the end of the works, due to the unprecedented nature of the works very close to the property.

Comments on the Heritage Statement, accompanying application 2017/3593/L
Alan Chandler BSc Hons, AA Dip. RIBA SCA FHEA 03 September 2017

At 2.1.12 the need to intervene to reduce unacceptable noise transmission through the Listed property's glazing is established. The period of the works is referred to twice in the same sentence – this emphasis defines a 'temporary' proposal. The temporary nature of the proposals are addressed in 3.4.5, with an end date for the intervention's necessity being set at 2026.

In Listed Building terms this creates concerns - where the future security of the building fabric is paramount how does one define the acceptability of temporary measures which, through their short-term technical requirements, may prove unacceptable in the long term by affecting the character of the Listed property? It is noted that HS2 offer only to remove these acoustic interventions if requested by the owner, making the visual acceptability of the secondary glazing units all the more important because they are likely to become permanent by default.

To summarise, the Heritage statement must be clear on the evidence that the installations are in every case appropriate as long-term additions to the building, OR are to be automatically removed when redundant in 2026. At present the proposal is not appropriate as a long-term addition – yet there is no means to ensure that the intervention will be removed.

As a Heritage Statement, we look for a concise description of the areas to be affected, an evaluation of options that meet the technical requirements established to justify the work and, given the stated "temporary" nature of the installation, how the installation can be fitted and removed with minimal damage to the fabric of the grade II* properties. This latter evaluation should be supported by on-site investigations into the composition and condition of the affected surfaces, with an informed method statement that addresses this evidence. When a listing description or documentary evidence on a property is scant, on-site investigation is critical. As noted in 3.1.5 the listing description omits reference to the interior. The affected areas are occasionally plastered masonry, more often original joinery such as shutters that are by definition both fragile and extremely important to the character of the building. This is recognised in section 3.2.6 and 3.2.7. Of concern is the phrase "reversible as far as possible" in 3.4.6 – what does this imply? How, and when is this not possible, what is the extent of the long term damage that is being conceded? Are holes simply filled, or are timber plugs of a suitable species and moisture content inserted? Are the shutters fully working before the installation and left in a similar condition, or will the nine year closure within a potentially overheated South-East facing aspect create issues of warping and desiccation – will this too be rectified?

Again in 3.5.3 the issue of compromise between performance and historic fabric is

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					<p>mentioned, but again remains unqualified through a lack of proper investigation. To summarise, the evidence presented along with the design proposals should be supported by documented investigation of the affected areas of the property, establishing suitable methods of intervention and reversibility.</p> <p>Given the grade II* Listing, Historic England are statutory consultees. Published guidance stresses reversibility, advocating the use of 'staff bead' secondary glazing with no intrusive sightlines/framing that is always more minimal than the existing window. Reference is made to pinning back shutters, however no detail is given as to the long term affect of this operation, and no field trials on such an operation have been conducted. From experience on a Grade II* Queen Anne property in Petersham, Surrey with a South-East aspect, shutters released from deep-set secondary glazing required complete dismantling (of all joints in each panel) and straightening, in order to return them to full operation. Evidence of this was presented at the House of Lords Select Committee in 2017. 3.5.6 asserts that the proposals have "been designed to avoid any substantial harm", but no objective evidence has been laid out to support this claim.</p> <p>In the presentation delivered to the House of Lords Select Committee, the weight of glass used in internal secondary glazing was referred to. In the proposals for the principal ground floor room at 34 Park Village East use is made of an add-on secondary cill to infill the bottom of the installation, which is inset from the window. The weight of glass and framing is either bearing onto this add-on cill, or is being sent into lateral fixings into the pinned back shutters. What historic fabric are the add-on cills being fixed to? Can it take the weight of the secondary glazing? Is load being placed onto the pinned back shutters via screws? Where is the evidence that supports the claim that the proposal will "avoid substantial harm" (3.5.5). No fixings have been specified into any of the historic fabric, nor details of how the shutters will be fixed in place.</p> <p>To summarise, the particularity of each installation requires quantitative evaluation in order to demonstrate 'least harm'.</p> <p>3.5.6 reiterates the "sensitive nature of the Listed building". As there is no undertaking to remove the installation in 2026, the secondary glazing must be considered as a potentially permanent addition to the property, and as such needs to demonstrate sensitivity in design, placement and detail. This is acknowledged later in 3.5.6 where it is stated "the secondary glazing has been designed to be sympathetic to the host building". How is this demonstrated? Does the proposal in every case respond to the published advice to minimise sightline interference and to use framing that is subservient in detail and scale to the original?</p> <p>Where staff bead installations are close to the original window, alignment often reduces the visual presence of the secondary glazing. With the deep set requirement for this glazing alignment appears, in the drawings, to have been staggered on horizontal elements to attempt to align the members for a viewer looking up from pavement to first floor level. This however creates misalignment for the occupant. Arguably a passerby spends a minimal time looking at the Grade II* property, the occupier much more – how has this judgement been arrived at? The used of inward opening secondary casements creates framing which is wider than the original. As a short-term installation this lack of sympathy with the original could perhaps be argued for if there was an requirement for eventual removal; as a</p>

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					<p>permanent addition it is arguably unacceptable. 3.5.16 stresses how straightforward the removal of the units would be (without addressing the points about loading made above). Again, is this a temporary installation or a permanent one? How is appropriateness to be judged?</p> <p>To summarise: some of the windows follow the idea of minimal sight lines and minimal section sizes (basement and top floor), others do not (ground and first floors). The inward opening framing is visually heavy and will be practically heavy and the heritage statement makes no proper evaluation of what other options have been considered nor a justification for the solution proposed.</p> <p>The matter of permanence referred to at the start of this piece is further confused in 4.2.1 where there is acceptance that HS2 cannot remove the installation, and claims that a “worst case scenario” has been accepted “alongside the temporary”. The simplest course of action would be to determine all HS2 related mitigation is temporary, that it is removed automatically in 2026, and that if an owner wishes to retain secondary glazing than a new application is made to retain it, or to propose a better and more visually acceptable solution such as a staff bead installation as advocated by Historic England (that will be appropriate for normal day-to-day background noise). Permanently pinning back shutters for the deep-set HS2 installation is unacceptable when the long-term secondary glazing solution in using ‘staff bead’ glazing would retain the shutters in proper order. This fact alone requires that the HS2 proposal is conditioned as temporary as it is not in the best long-term interest of the building and its fabric.</p> <p>As such the assertion made in 5.2.8 that the NPPF requirement to “properly assess the nature, extent and importance” of the heritage asset has been met, is refuted. Compliance with Camden Core Strategy 2010 is also questioned – minimal impact through “bespoke design” has not been delivered, because the installation of the additional framing and the pinning back of working shutters is not necessary, other than because of the exceptional nature of the construction work to be undertaken. As such Policy DP25 appears not to have been met.</p> <p>The Conclusion of the Heritage Statement makes clear that the proposed installation is both temporary and permanent, and that there will be no discernable visual impact even though the glazing is in some cases wider than the original, and from an internal perspective misaligns with the original window. 6.1.11 considers secondary glazing a private benefit, the bulk, location and misalignment of many of the proposed window installations certainly impact this benefit, and assumes that external presentation of a heritage asset is the overriding criteria. The occupation and regular use of the glazing and shutters to maintain their use-value and operability for future generations is also paramount.</p> <p>In summary: the HS2 Heritage Statement is a piece of advocacy rather than an objective assessment of the short and long-term security of the listed building.</p> <p>See attached photographs of the visual effects of a similar installation in Montague Street:</p>