Address:	Alexandra Road Estate Rowley Way London NW8 0SN		**6 & 7**
Application Number(s):	2023/5338/P 2024/0091/L	**Officer:** Elaine Quigley	
Ward:	Kilburn		
Date Received:	20/12/2023		
Proposal:	**Planning permission (2023/5338/P)** Replacement of the existing estate-wide heating distribution infrastructure including removal of redundant pipework; installation of two new sub-plant rooms; installation of cold water storage tank rooms; replacement of existing site hoarding and installation of new replacement infrastructure pipework. **Listed Building Consent (2024/0091/L)** Replacement of the existing estate-wide heating distribution infrastructure including removal of redundant pipework; installation of two new sub-plant rooms; installation of cold water storage tank rooms; replacement of existing site hoarding and installation of new replacement infrastructure pipework		

Background Papers, Supporting Documents and Drawing Numbers:

Existing drawings:
Site location plan; 3467_LB_004000 rev P3; 3467_LB_003000 rev P3; 3467_LB_003002 rev P3; 3467_LB_003010 rev P3; 3467_LB_003011 rev P3; 3467_LB_003012 rev P3; 3467_LB_003013 rev P3; 3467_LB_003014 rev P3; 3467_LB_003015 rev P3; 3467_LB_003016 rev P3; 3467_LB_003017 rev P3; 3467_LB_003018 rev P3; 3467_LB_003019 rev P3; 3467_LB_004012 rev P3; 3467_LB_004013 rev P3; 3467_LB_004014 rev P3; 3467_LB_004020 rev P3; 3467_LB_004021 rev P3; 3467_LB_004031 rev P3; 3467_LB_004034 rev P3; 3467_LB_005020 rev P3.

Proposed drawings:

3467_LB_110000 rev P3; 3467_LB_110002 rev P3; 3467_LB_11003 rev P3; 3467_LB_110004 rev P3; 3467_LB_110005 rev P2; 3467_LB_120000 rev P3; 3467_LB_120001 rev P2; 3467_LB_120002 rev P2; 3467_LB_120003 rev P2; 3467_LB_120005 rev P3; 3467_LB_120006 rev P3; 3467_LB_120007 rev P3; 3467_LB_120008 rev P2; 3467_LB_120010 rev P3; 3467_LB_120011 rev P3; 3467_LB_120012 rev P3; 3467_LB_120013 rev P3; 3467_LB_120015 rev P2; 3467_LB_120020 rev P2; 3467_LB_120021 rev P2; 3467_LB_120022 rev P2; 3467_LB_120023 rev P3; 3467_LB_120024 rev P2; 3467_LB_120025 rev P2; 3467_LB_120026 rev P2; 3467_LB_120027 rev P2; 3467_LB_120030 rev P2; 3467_LB_120031 rev P2; 3467_LB_120032 rev P3; 3467_LB_120033 rev P3; 3467_LB_120040 rev P2; 3467_LB_130000 rev P2; 3467_LB_130001 rev P2; 3467_LB_130010 rev P3; 3467_LB_130011 rev P3; 3467_LB_130012 rev P3; 3467_LB_130013 rev P3; 3467_LB_130014 rev P3; 3467_LB_130015 rev P3; 3467_LB_130016 rev P3; 3467_LB_130020 rev P2; 3467_LB_130021 rev P2; 3467_LB_130022 rev P3; 3467_LB_130023 rev P3; 3467_LB_130030 rev P2; 3467_LB_130031 rev P2; 3467_LB_130032 rev P2; 3467_LB_130033 rev P2; 3467_LB_140005 rev P2; 3467_LB_140006 rev P3; 3467_LB_140007 rev P3; 3467_LB_140010 rev P3; 3467_LB_140011 rev P2; 3467_LB_140020 rev P2; 3467_LB_331000 rev P3; 3467_LB_331001 rev P2; 3467_LB_331002 rev P2; 3467_LB_331003 rev P2; 3467_LB_331004 rev P2; 3467_LB_331005 rev P2; 3467_LB_331006 rev P2.

3547-RW-M-020; 3547-RW-M-502; 3547-RW-M-503; 3547-RW-M-505; 3547-RW-M-506; 3547-RW-M-507; 3547-RW-M-519; 3547-RW-M-534; 3547-RW-M-541; 3547-RW-M-560; 3547-RW-M-561; 3547-RW-M-562; 3547-RW-M-563; 3547-RW-M-601; 3547-RW-M-602; 3547-RW-M-605.

Supporting Documents:
Acoustic Consultancy Report prepared by LCP dated 07/08/2024; Alexandra Road Estate Heating Infrastructure Technical Report prepared Levitt Bernstein dated February 2020; Design and Access Statement prepared by Levitt Bernstein dated November 2023; Brochure extract by Unistrut (P3300T10); Brochure extract by Unistrut (M8_M10 Standard R); Strut details prepared by Big Foot Support; LD Support Frame and Support Foot data sheet produced by Roof Runner.

RECOMMENDATION SUMMARY:

(i) Grant conditional planning permission subject to a s106 legal agreement
(ii) Grant conditional listed building consent

Applicant:	**Agent:**
London Borough of Camden 79 Holmes Road London NW5 3AP	Levitt Bernstein Thane Studios 2-4 Thane Villas London N7 7PA

EXECUTIVE SUMMARY

i) The council property team proposes works to replace the heating system, replace and upgrade windows, install interfaces for heating emitters, and associated internal works like pipe and service runs. The works have been separated into two sets of applications:

- a set of applications to cover the replacement heating, external pipework, and the associated internal pipework to serve the new heat interface units (references 2023/5338/P and 2024/0091/L, and the subject of this report), and
- a set of applications to cover the replacement of the glazing (references 2023/5339/P and 2024/0286/L).

ii) The application is for the replacement of the existing heating and hot water system associated with the Alexandra Road Estate which is a Council owned residential estate. The works include decommissioning the existing heating system within dwellings and its replacement with new distribution network, including installation of two new sub-plant rooms; installation of cold water storage tank rooms and installation of new replacement infrastructure pipework.

iii) The decommissioning of the existing heating and hot water system is accepted given its age, the associated issues with access and maintenance and running costs. The proposal would retain the use of the existing communal gas boilers in conjunction with the installation of new individual heat interface units (HIU's) in each flat. The continued use of the existing communal gas boilers has been accepted given the age and future life expectancy (10-15 years) considering the need to resource efficiency and generating unnecessary waste. Alternative greener options to heat the estate have been explored including external and internal insulation of the buildings. The outcome of that exercise confirms that the majority of the options have been discounted due to either technical shortcomings, impacts to the Grade II listed fabric and overall costs. The new HIUs and the associated infrastructure will be future proofed to link to alternative greener hybrid solutions when the existing gas boilers come to the end of their life.

iv) The Alexandra Road Estate includes Grade II* and Grade II listed buildings. It is also located within the Alexandra Road Conservation Area. The decommissioning of the existing heating system is regrettable, but the long term future of the buildings, the estate, and energy consumption across the borough means an upgrade is now necessary. The proposals would cause less than substantial harm, at the low end of the scale, to the significance of the Blocks A and B which are Grade II* listed buildings with regards to the internal and external works. There is no harm to the other listed buildings, the Alexandra Road Estate Conservation Area or the setting of the Alexandra Road Estate Park which is a Grade II* listed Registered Park and Garden. Although the harm is at the lower end of the scale, you must give this harm considerable weight and importance. Officers believe there are public benefits that outweigh the harm, including sustainability benefits arising from reduced energy use and a lower carbon footprint, as well as improved quality of service and choice to local residents.

v) The scheme would not raise any impact on existing and neighbouring residents in terms of loss of daylight, sunlight, privacy or noise. There would be disruption arising from the implementation works themselves, but this would be temporary.

vi) The proposal includes the installation of new water storage tanks within the car parking / garages under the residential blocks. The loss of 22 car parking / garage spaces on site is welcomed, reducing dependency on private motor vehicles.

vii) The scheme would deliver sustainability benefits in the form of more energy efficient replacement heating and hot water system to the estate which is future proofed to link to alternative greener heating solutions. It would make use of existing boilers that are not at the end of their life, maximising resource efficiency. The less than substantial harm to heritage assets which has been identified is outweighed by public benefits.

viii) Taking account of the policies of the development plan and all material planning considerations, including the representations made by local residents, local groups and statutory consultees, the proposals are considered acceptable. A shadow section 106 legal agreement will be secured to ensure that the works are implemented concurrently.

ix) The scheme complies with the development plan as a whole and is recommended for approval subject to the shadow section 106 legal agreement.

OFFICER REPORT

Reason for Referral to Committee:
The Director of Economy, Regeneration and Investment has referred the application for consideration after briefing members due to the significant number of objections to each of the applications (Clause 3(vii)).

1. SITE AND BACKGROUND

Designations

1.1 The following are the most relevant designations or constraints:

Designation	Details
Listed buildings	Grade II* and Grade II
Conservation Area	Alexandra Road
Registered Historic Park or Garden	Alexandra Road Park (Grade II)

Table 1 - Site designations and constraints

Description

1.2 The application site consists of a linear housing estate that stretches from Loudon Road in the east to Abbey Road in the west, with the West Coast Mainline Railway line bounding the site immediately to the north. The site covers an area of approximately 6.47 hectares.

Figure 1 – The existing site

1.3 Designed in 1968 and built between 1972-1978 by the architect Neave Brown of Camden's Architect's Department (under Sidney Cook), Alexandra Road Estate is widely acclaimed to be one of the most exceptional and iconic examples of postwar social housing in Britain. The Architect's Department developed a low-rise, high-density model to meet a high housing demand as

an alternative to a high-rise approach; the linear stepped section of the blocks was inspired by the work of Leslie Martin and Patrick Hodgkinson, including at the Brunswick Centre (1967-72). By including a park and community buildings (including resource centre, community centre, shops, and launderette) the Estate fulfilled the opportunity to improve an entire neighbourhood. A reinterpretation of the traditional street was a key element of the design; each dwelling is entered directly from the street, freed by traffic by below-ground parking.

1.4 The majority of the concrete blocks are Grade II* listed. Two later mixed use blocks on the eastern end of the estate at Loudon Road and Alexandra Place were built from 1974-80 to the designs of architect Tom Kay using a brick aesthetic, and are listed grade II. The entire estate is situated in the Alexandra Road Estate Conservation Area. The park which forms a spine through the estate (between Blocks B and C) has been designated as a Registered Park and Garden which is Grade II* listed.

1.5 The estate is separated into 3 blocks. Blocks A is 7 storeys and Block B and Block C are 4 storeys. The Estate is constructed from site-cast board marked white, unpainted reinforced concrete, capable of the large spans required by the stepped section of the megastructure with flat roofs. The 3 blocks are parallel to each other with Block A, the northern block, forming an acoustic wall to shield the estate from the adjacent railway line. The northern pair of blocks (Block A and Block B) face in towards the pedestrian street, Rowley Way, and are organised with stepped elevations facing in towards Rowley Way. Each level provides a private outdoor area for every home.

1.6 Block A, Rowley Way comprises 2 storey, 2 bed flats at the top and 2 storey, 3 bed flats at the bottom with 3 layers of single storey 1 bed flats between. Block B comprises 4 storeys of 2 and 3 bed masionettes.

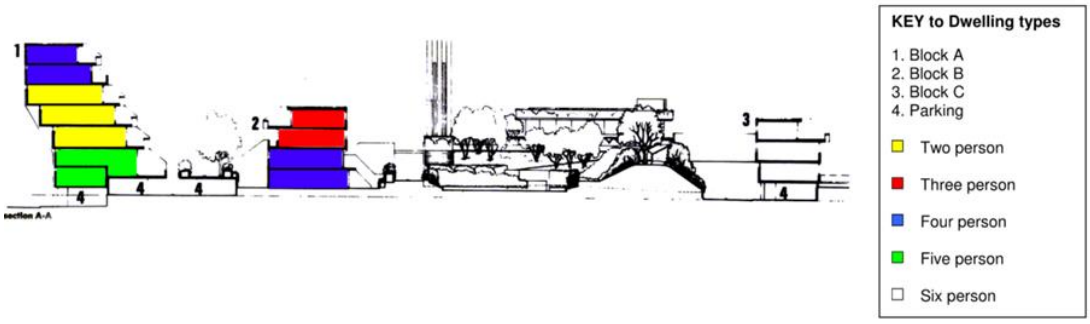


Figure 2 - Typical dwelling types within the Alexandra Road Estate

1.7 The site has a Public Transport Accessibility Level (PTAL) rating of 2 (Moderate) but is within walking distance of South Hampstead and West Hampstead tube stations, as well as a number of bus services.

2. THE PROPOSAL

2.1 The proposal is for replacement of the existing distribution pipework across the estate with the installation of a heat interface unit within each home. The following works:

External works

- Partial removal and total replacement of the secondary low temperature hot water (LTHW) heating distribution pipework to the estate dwellings. This would run from the boiler house to all home through external pipes. The proposed heating pipework would run from the water tanks on the roof along the roof of the blocks and down the relevant elevations (northern elevation fronting the railway line on Block A, the western side elevation of Block B, under the soffits of each of the blocks in Block C).
- Installation of above ground exposed and insulated 2 pipe hot water flow and return pipework
- Installation of cold water storage tanks in 2 of the parking bays of the existing garages / parking bays of each block. Blocks A and C are formed of 8 blocks so 22 parking spaces would be affected. The garage doors would be replaced with louvre doors.

Internal works

2.2 Replacement of internal pipework connecting into each home from the estate distribution network via a new heat interface unit (HIU), located in the same location as the existing domestic hot water cylinders which will be removed.

2.3 The replacement heating and domestic hot water services would also extend to other community buildings within the estate including the Council offices, Youth Club, Loudon Way workshops, Community Centre, Alexandra Place dwellings as well as the flats about the shops on Langtry Walk. Stand-by heating would also be provided to the College Building.

2.4 The other set of applications covers the HUIs as well, and then proposes glazing upgrades. The glazing upgrades are not included in this set of applications.

Revisions

2.5 A revised acoustic report and additional detailed drawings associated with the design of the boosted cold-water supply were submitted during the course of the application.

3. SHADOW SECTION 106 LEGAL AGREEMENT

3.1 Objections have been received (see Consultation summary) that there should have only been one planning application and one listed building consent for all the works to cover the replacement heating system, the

replacement windows, heating emitters and all associated internal works. However, it is for the applicant to divide the programme of works into applications as they wish. They are nonetheless related and have been considered by officers in light of one another. The applicant has separated the works into two sets of applications:

- a set of applications to cover the replacement heating, new sub-plant rooms, cold water storage tank rooms, external pipework, and the associated internal pipework to serve the new heat interface units (references 2023/5338/P and 2024/0091/L), and the subject of this report
- a set of applications to cover the replacement of the glazing installation of new heat emitters (radiators) and the associated internal pipework to and from the new heat interface units (references 2023/5339/P and 2024/0286/L).

3.2 A legal agreement is recommended to secure the full implementation of the works so that they are fully and satisfactorily completed to ensure consistency, uniformity and completeness, and to ensure social equality for the residents which was a driving factor behind the original architectural design of the estate. The intention would be for such assurances to preserve the special interest of the grade II* listed buildings. The two sets of applications, for the heating distribution infrastructure and the replacement glazing, would be linked by a legal agreement head of term (HoT).

3.3 The recommendations are based on certain HoTs being secured in the event of approval. These Heads of Terms would usually be incorporated in a s106 agreement. However, in this case the applicant is the Council and as a matter of law the Council cannot enter into a s106 agreement with itself.

3.4 Nevertheless, it is still imperative that this application is dealt with in a way that is consistent with the way the Council would deal with non-Council applications. Therefore, the Heads of Terms will be embodied in a “Shadow Section 106 Agreement”. This will be in the same form as a “standard” Section 106 agreement. Incorporating the “usual” legal clauses and negotiated by separate lawyers within the Borough Solicitor Department representing the interests of the Council as landowner or applicant, and the Council as local planning authority.

3.5 The shadow section 106 will include a provision linking the applications for the works that form part of this planning application and the works for the heating distribution infrastructure that forms part of the other set of applications (planning ref 2023/5339/P).

3.6 The shadow s106 agreement will include, among other things, a provision requiring (i) that in the event of any disposal of the relevant land the shadow s106 agreement terms will be included in the terms of the sale transfer and

(ii) the purchaser will be formally required to enter into a shadow s106 agreement as owner of the land at the point of acquisition (and hence its terms will thereafter bind the site).

3.7 Once the shadow s106 agreement has been finalised, the Director of the applicant department will sign a letter formally undertaking on behalf of the department that its provisions will be complied with during the course of the development.

3.8 The shadow s106 agreement and the Executive Director or Director's Undertaking of Compliance will be noted on the Planning Register (so the agreement is put on the record in the same way as a "standard" s106 agreement) and compliance with the shadow s106 agreement will be tracked and monitored by the Planning Obligations Monitoring Officers in Development Management in the same way as a standard agreement.

4. RELEVANT HISTORY

The site

4.1 **2023/5339/P and 2024/0286/L** - Replacement of existing single glazing with double glazing, removal of domestic hot water cylinders and installation of new heating interface units, emitters and associated internal work. **This is the other set of applications relevant to this set of applications and is pending consideration.**

4.2 **2020/1450/P and 2020/2723/L** - Replacement of the existing estate-wide heating distribution infrastructure including removal of redundant pipework; installation of two new sub-plant rooms; replacement of existing site hoarding and installation of new replacement infrastructure pipework. **Granted on 17/11/2020**

Part of these permissions included the installation of the new heat interface units and associated pipework within the flats. These works were undertaken in 2 uninhabited flats (referred to as the pilot flats) in January 2022. The pilot flats demonstrated the various approaches that were being considered including options for heat emitters.

4.3 **2010/4568/P and 2010/4575/L** - Installation of external ducting in association with replacement of existing underground heating services on the Alexandra and Ainsworth Estate (Class C3). **Granted on 03/11/2010**

4.4 **2008/3640/P and 2008/3687/L** - Installation of semi-circular risers on alternate structural columns from ground to roof level on the north elevation of blocks A1- A5 to provide new electrical and heating services and associated works to staircase at ground level. **Granted on 27/01/2009**

5. CONSULTATION

Statutory consultees

Historic England

5.1 No objection to the thermal upgrades or the replacement of the heating infrastructure and consider that the applications meet the requirements of the NPPF. Overall the proposed new heating systems are considered to have a low impact on the architectural significance of the interiors of the residential units. Furthermore, the works would be largely reversible, therefore they would not prejudice the installation of new technologies as they evolve in the future, while minimising impact on historic fabric. Historic England was pleased to be involved in pre-application discussions about these proposals which, following the exploration of a range of options, appear to be well considered. We acknowledge that the proposals will cause noise and disturbance to residents. However, the proposals seek to address long term issues with heat loss to windows and doors and the provision of heating across the estate. In our view, the proposals that are the subject of these applications are likely to have a minimal impact upon the special architectural and historic interest of the building

Local groups

Alexandra and Ainsworth Estate Tenants and Residents' Association (TRA)

5.2 Objection covering the following issue(s):

Heritage

- Extensive. Irreversible harm to the Grade II* listed interiors of all dwellings
- Extensive, irreversible harm to the Grade II* listed exteriors of Block A and Block B
- Need for external and internal insulation has been discounted on heritage grounds but heritage concerns are ignored when it comes to the destruction of the interiors
- New external and internal pipework and new radiators would harm Neave Brown's architectural vision

Officer response: The impact on heritage assets has been carefully considered. Officers identify less than substantial harm at the lower end of the scale. Harm has been balanced, not discounted, and efforts have been made to minimise harm first, where possible. See analysis of significance assets in the Heritage Section and an assessment of the level of harm. The impact on all designated and non-designated heritage assets is considered in this section. The new radiators and associated internal pipework form part of the separate listed building application ref 2024/0286/L which are also being considered by the Council.

Technical concerns:

- New system is expensive and high maintenance and not in line with climate change
- Condensation and black mould is a major issue which has not been mentioned in the applications
- Concerns about health risks arising from potable water system
- Retrograde system

Officer response: See Sustainability section. The issues of mould from condensation have been considered in the assessment. The functionality of the existing ventilation systems will be reviewed in the rooms that are a potential source of increased moisture to help minimise condensation and mould. See Other Issues section.

Options associated with HIU's within the flats

- Relying on installation of heat interface units reduces the ability to discuss all options available for internal distribution of heat / hot water within the flats

Officer response: The HIU would contain the return temperature limiters which are required to work with future heat pump technology including connection to possible ASHP's.

Sustainability

- No intention to reduce heat loss and energy demand. Contrary to Camden's own target of zero emissions. There are better green alternatives that are more cost-effective and environmentally friendly that would also minimise the impact on architectural features.
- Neglecting the climate crisis by not investing in long term renewable energy
- Overlooked alternative solutions

Officer response: Alternative heating options were considered prior to the submission of the application but were discounted for a number of reasons including limitations with current technology providing sufficient power to the existing distribution network, impact on the historic fabric and cost. See Sustainability section for further details.

Noise and disturbance

- The residents are already stressed and worried. The Better Homes project was bad and this could be worse.

Officers response: Any works of repair and refurbishment will have a level of disruption and this will be proportionate to the scale of the works. See Amenity section and Other Issues section.

Alternative solutions

- In light of the information circulated as part of the consultation on the internal distribution options, the A&A TRA believes that the Council has so far overlooked alternative solutions which might make the need for renovation the external distribution network unnecessary. These alterative solutions include the installation of Combi boilers in each property or the use of electrical heating systems. Ongoing consultation regarding the internal heat emitters including preferred option of skirting heating. However planned replacement of the external distribution network and the installation of HIU's should be put on hold until alternative options are considered.

Officers response: Due to the remaining life expectancy of the existing gas boilers the estate will continue to heated using gas. Alternative energy efficient solutions will be considered when the existing gas network is to be replaced in the future. See Sustainability section

Concerns about quality of life /discrimination

- Disruption to the elderly, young families and others during the works.
- Residents are stressed and worried about the intrusion, stress and disturbance.
- Circulation / fire escape pathways within the flats would become too narrow for the disabled.

Officer response: Any works of repair and refurbishment will have a level of disruption and this will be proportionate to the scale of the works. See Amenity section. Internal circulation space for disabled users / fire escape issues fall within the Building Regulations and planning should not double up on this. The impacts will also be temporary and must be balanced against the benefits of the scheme and considered against the development plan as a whole. The impacts of the works can often affect certain groups more (including those with protected characteristics) but such impacts are not considered to outweigh a recommendation for approval.

Lack of engagement

- The Council claims to have consulted TRA and that they support the application but this is not true. Significant levels of objections from local residents about the application reflecting widespread resistance across the whole community.

Officer response: The details of engagement are provided in the Consultation section. Resistance to the proposed works is clear from the significant number of objections that have been received to the applications. However, representations have also been made in favour of the application. The number of objections is not a material planning consideration in itself – it is the material planning issue which is relevant, and the weight is for the decision maker unless otherwise noted.

The AA leaseholders Group

5.3 Objection covering the following issue(s):

Heritage

- Application suggests some internal walls, flooring and ceiling will be stripped out but no details provided
- Contractors will not be supervised and may remove historic fabric
- The application states plinths will be used for trench heaters, involving metal grilles the length of the surface. The Capital Works Manager says this is not going ahead and so remains unclear
- The whole area will be a building site for years

Officer response: The works associated with the installation of internal pipework to serve heat emitters is included in the associated listed building application (ref 2024/0286/L). The impact on heritage assets has been carefully considered. Officers identify less than substantial harm at the lower end of the scale. Harm has been balanced, not discounted, and efforts have been made to minimise harm first, where possible. See analysis of significance assets in the Heritage Section and an assessment of the level of harm. The impact on all designated and non-designated heritage assets is considered in this section. The new radiators and associated internal pipework and the plinths form part of the separate listed building application ref 2024/0286/L which are also being considered by the Council.

Environmental / sustainability impacts

- No sustainable urban drainage (SUDS) is provided. Surface water with all the building contamination will be drained into the main sewer and foul swage will be disposed of by other or unknown methods
- No figures have been provided to demonstrate the NOx particulate matter or greenhouse gas emissions
- No heat pumps, no solar energy, no passive cooling units and no green roof or anything else to offset the impact of this proposal.

Officer response: Sustainable urban drainage is not required to be provided as part of the proposed works. The option to use the existing gas boilers and considerations associated with alterative heating options is discussed in the

sustainability section. The NOx particulate matter has been discussed in the sustainability section of the report. The review of the life of the existing boilers has been undertaken and still has an operational life expectancy of 10-15 years.

Consultation

- Residents have not been consulted over the heating upgrade. No opportunity to question the proposal. Too many questions that have not been discussed.

Officer response: The details of engagement are provided in the Applicant Consultation section.

Length of time to carry out the works

- Unoccupied pilot flats took 10 weeks over 6 months to install the HIU's and associated works and the replacement glazing. The Council suggest the upgrade works will take 10 days in a fully occupied flat. How?

Officer response: The schedule programme and duration of works is undertaken by the Council as freeholder

Vehicle Parking

- 22 garages would be given over to large cold water storage. These garages have already been broken into for works to start

Officer response: The cold water storage boosters would be secured by metal louvred doors. The garages are currently rented or leased from the Council and the security of these spaces would be managed by the Council as applicant and freeholder. The applicant has confirmed that no construction works relating to this proposal have not started on site.

Condensation and mould

- Due to design of the current (original) heating system there is no condensation or mould. There is no planned insulation of flats so heating will create conditions for damp and mould

Officer response: The issues of mould from condensation have been considered in the assessment. The functionality of the existing ventilation systems will be reviewed in the rooms that are a potential source of increased moisture to help minimise condensation and mould. See Other Issues section for full details.

Maintenance

- Existing boilers won't last predicted 15-20 years and there is no contingency plan if the boilers fail
- The existing heating system has not been properly maintained which has led to the failure of the system

Officer response: The ongoing maintenance of the heating system is a matter for the Council as freeholder. See section Existing heating system and its replacement for further details

Costs

- No control over gas prices and heating costs have risen 318% between 2023 and 2024
- The proposal will saddle all residents with totally unreasonable heating costs for 15-20 years along with 2 lots of major works costs for leaseholders

Officer response: The costs associated with the new heating system will be costed by the Council as freeholder.

Joint letter from the TRA and the Leaseholder Group

5.4 A joint letter from the Alexandra and Ainsworth Tenants and Residents Association (TRA) and the Alexandra and Ainsworth Leaseholder Group - Registered Tenants Association was sent to the Leader of the Council and the Chief Executive in November 2024. It raised the following points:

Ownership certificates

- The incorrect certificate of ownership has been submitted with the applications with Certificate A signed rather than Certificate B. Application should be rejected until this is rectified

Officer response: The applicant was made aware of this issue and will submit and serve an updated Certificate of Ownership in line with the correct procedure. An assessment of the applications can continue to be carried out but a decision cannot be issued until it has been received.

Separation of the works into 2 separate applications

- The proposed works are co-dependent on each other and on can't happen without the other. This presents an incomplete picture to the planning department and is misleading as the applications cannot be considered in isolation.

Officer response: Although separate applications have been submitted for the replacement heating system and replacement glazing the applications have been considered by officers together. The planning applications for the

replacement glazing and heating infrastructure (refs 2023/5339/P and 2023/5338/P) will also be subject to a shadow section 106 agreement to link them so that they are implemented together.

Lack of reference to Alexandra Road Estate – Management Guidelines 2006 or other current advice for Grade 2 listed buildings*

Concerned about omission of reference to these documents in the application as it doesn't demonstrate adherence to this current advice.

Officer response: The Alexandra Road Estate Management Guidelines (2006) is a conservation manual. The document was never formally adopted by the Council so this document is for guidance purposes only. The guidelines document is also 22 years old and much of the advice in them is now outdated – for example specification of certain products. Advice relating to the kitchens, bathrooms and electrical wiring in the guidance has been superseded by the shadow Heritage Partnership Agreement (this probably is not applicable to the heating and window proposals). In assessing the applications the Council has considered the relevant planning policy documents and supporting planning documents.

Inadequate drawings and information required for a Grade 2 listed building*

- Grade 2* listed buildings are deemed particularly important by Historic England and paragraph 206 of the NPPF affirms this extra special significance of Grade 2* and requires that clear and convincing justification for the alteration or destruction of the asset must be sought. These applications do not provide essential information and are inadequate in the following ways:
  a) It does not acknowledge that it is changing a fundamental design principle of the heritage heating system (maintenance of a 160c internal temperature. This heating strategy has avoided the occurrence of condensation, damp and mould at the estate for the last 50 years
  b) The application minimises the extent of the damage to the structure that will be caused by the new distribution network drilling many holes for either heat distribution pipes or ventilation through the concrete structure rejecting the option to reuse existing duct routes. No provision has been shown on the external elevations and making holes in a grade 2* external façade is a material consideration.
  c) The provision of verified 3D visualisations of the publicly available iconic views has not been provided. The 3D's that have been provided are diagrammatic of only small areas giving a falsely favourable impression that does not show all the connections or the distributing "T" pipework. A previous planning application (2020/1450/P

withdrawn) illustrated in 3 dimensions how the pipes on the north elevation swept up and over the top floor to distribute on the roof. The clutter of pipes will have high impact on the skyline elevation and should be illustrated by verified 3D's in order that officers can make an informed decision.

d) The planning application (2023/5339/P and 2024/0286/L) (windows and internal radiators) notes that residents were shown 2 pilot flats fitted with new bespoke cupboards to accommodate the HIU's, the associated wiring, pumps and controls. While the description in the planning application refers to the removal of the hot water cylinders, it makes no mention that the proposal is to rip pit the original 1970's built in cupboards, sliding doors and shelving that has been protected for retention in previous listed building applications. No drawings or even photographs have been submitted to show the detail of this bespoke item of original built in furniture. No details of the proposed new joinery and hardware, as shown to the residents in the pilot flats, are included within the application. The shelving and hot water cylinder cupboard could be seen as a 'minor heritage item' but it is used daily by residents. Insufficient detail is provided within the application to ensure that poor quality substitutions would not be provided should the original cupboards be consented. It is a major error to not to acknowledge the removal of the historic built-in shelving and insist on detailed drawings and specifications, hardware etc to show the replacement sliding cupboard doors and interior.

e) The decision to heat the flats with radiators is more damaging to the internal heritage than might be imagined as the consequences are not fully explained in the applications. The recessed flush skirting's, are an important internal heritage feature in every flat throughout the estate. The application proposed that the new radiator pipework will run at skirting level. As a consequence, the existing flush electrical sockets will need to be displaced, as the depth behind the skirting board is insufficient to house the pipework, resulting in skirting boards being ripped out, and replaced with new projecting boxings that have no resemblance to the original. This is not reversible. New sockets will be surface mounted above the skirting board. A reversible and less expensive solution, considered in consultation with tenants, needs to find an option that is less damaging to the heritage and resident's flats. Until that is agreed, this proposal should be rejected.

Officer response: The impact on heritage assets has been carefully considered. Officers identify less than substantial harm at the lower end of the scale. Harm has been balanced, not discounted, and efforts have been made to minimise harm first, where possible. See analysis of significance assets in the Heritage Section and an assessment of the level of harm. The impact on all designated and non-designated heritage assets is considered

in this section. The applicant has confirmed that it is proposed to retain the original cupboards and shelves wherever possible. In flats were existing cupboard shelves or sliding doors are warped, rotting or damaged, these are to be made good. The references to the replacement glazing and the existing cupboards are covered in the associated planning and listed building applications (ref 2023/5339/P and 2024/0286/L).

Inadequate regard for the national or local climate change agenda

- The application does not have a sustainable, carbon aware agenda. It purports to be about improving energy efficient heating but on the contrary, it proposed using existing very out of date non-condensing boilers that will be run even more inefficiently in order to provide low temperature to the proposed radiators
- Air source heat pumps are mentioned only as a potential future solution not as a planned actual provision. Improving insulation to the external envelope has been ignored (apart from the glazing) and no measures proposed to mitigate the obvious cold bridging in the existing structure have been incorporated
- Only improvement to the thermal performance of the external envelope is the proposal to install vacuum insulated glass (VIG) from China into the existing 50 year old window frames without any technical appraisal of the state of the poorly maintained existing windows, many of which will need replacing. A comparison between refurbishment of frames v's replacement of the frames that will give a new lave of life to our buildings is needed to inform a decision.
- Residents are frustrated at how ill-considered the proposals are in terms of eventual carbon and financial cost once the existing boilers fail. We would like to see a proper analysis and justification for the proposals. In particular the application shows no evidence of having looked at NPPF 14 Meeting the challenge of climate change, para 164 and the applications should be rejected on these grounds.

Officer response: The option to use the existing gas boilers and considerations associated with alterative greener options is discussed in the sustainability section. The applicant is proposing to retain as much of the existing historic fabric as possible to try to improve the thermal insulation of the building. The state of the existing window frames is discussed in the replacement window glazing application (ref 2023/5339/P and 2024/0286/L). The review of the life of the existing boilers has been undertaken and still has operational life expectancy of 10-15 years.

<u>20th Century Society</u>

5.5 Objection covering the following issue(s):

Damp and mould:

- Loss of background heat on the fabric could lead to build-up of condensation, damp and mould. Ventilation needs to be provided and doesn't appear to have been properly considered.

Officer response: The issues of mould from condensation have been considered in the assessment. The functionality of the existing ventilation systems will be reviewed in the rooms that are a potential source of increased moisture to help minimise condensation and mould. See Other Issues section for full details.

Consultation with local residents

- Concerned about lack of apparent meaningful consultation with the residents. If this had been carried out it would ultimately lead to a more robust and successful scheme

Officer response: The details of engagement are provided in the Applicant Consultation section.

<u>DOCOMOMO UK Working Party</u>

5.6 The DOCOMOMO UK Working Party objects to the proposal on the following grounds:

Proposals not in accordance with NPPF and has not mentioned the Conservation Management Plan (CMP)

- Work of this scale and significance should be planned and carried out in accordance and in reference to an established Conservation Management Plan that has been developed and agreed with residents. We have not seen evidence that this protocol for good practice has been followed

Officers response: The guidance has been considered, along with the improved thermal performance, as well as other up to date guidance. See Sustainability section and Heritage section for further details.

Lack of consultation with residents

- Condemn unexpected publication of the applications and lack of consultation with residents many of whom are well-qualified with technical expertise in building professions.

Officer's response: Consultation with residents has been undertaken prior to the submission of the applications. See Applicant Consultation section for further details.

Lack of detail in the plans

- There is insufficient detail on the impact on the flat interiors for the new heating units and without this, it is evident that the proposals will cause great harm to the significance of the exterior of the building and severely damage the integrity of the interiors, requiring intrusive radiators, pipework and large skirtings that are completely out of character to the carefully composed internal joinery, including cupboards and bespoke sliding doors of the original, still existing design. A credible listed building application for a Grade II* building requires detailed drawings for each flat and area which will be affected by the new pipework. As this does not currently exist this application for alterations to a Grade II* building is inadequate and the fitness of the proposals cannot be substantiated.

Officers response: The appearance and location of the external works and their impact on the significance of the listed buildings have been considered in the heritage section. The heat emitters (radiators) and associated internal pipework do not form part of this application but are part of the associated set of applications (ref 2023/5339/P and 2024/0286/L). Refer to Proposal section for further details.

Condensation and mould

- Concerned that the potential effects of switching off the heated walls have not been fully examined, leaving open the possibility of negative health outcomes to the occupants and the potential for interstitial condensation in the fabric of the building leading in turn to accelerated frost damage to the concrete

Officer's response: The issues of mould from condensation have been considered in the assessment and ongoing maintenance is possible but remains the responsibility of owners rather than the Council's planning department. Refer to Other Issues section

Removal of redundant pipework and new pipework

- There appears to be no proposal to remove redundant rooftop pipework, and this omission is deplored. As well as retention of pipework, it is highly shocking to understand that there are no proposals to insulate roofs or stepped soffits of the main block where insulation could be discreetly installed. In terms of pipework it is reasonable to expect that, where they are available, existing internal routes will be used for services installations on a Grade II* building. Otherwise it is essential that a proposed mock-up of pipework on the rear concrete fins should be installed in public view before any decision is made

Officer's response: The appearance and location of the external pipework and its impact on the significance of the listed buildings have been considered. Conditions would be attached to ensure the removal of any

redundant pipework and details of new external pipework and how it will be fixed to the historic fabric. See heritage section for further details.

Adjoining occupiers

5.7 Due to the size of the estate 14 site notices were displayed around the estate from 12/01/2024 to 05/02/2024 and a press notice was advertised from 18/02/2024 that expired on 11/02/2024.

5.8 An extensive number of residents, architectural experts and other interested parties have raised a wide range of objections to the proposed works on a macro and micro scale. Due to the number of objections received to the planning and listed building applications (over 500 objections to each application) it is not possible to list the individual addresses of all the objectors. The majority of the objections have been made to the replacement of the estate wide heating distribution infrastructure which form part of the other set of separate applications. The exact numbers of objections are difficult to tabulate and itemise across the two sets of applications. The majority of the objections are from local residents who live on the estate. The main concerns raised have been summarised below:

Principle of replacement heating and associated works

- Consideration should be given to refurbishing the existing heating systems. Diamond cutters can be used to chase around the couplings to get at the tails and to upgrade the existing heating coils.
- Proposal fails to justify the substantial alterations proposed
- Existing heating coils are not at the end of their life only the connecting pipework has deteriorated so the new pipework should be installed to this.
- No evidence to justify assertion that the existing heating system is broken and unsalvageable
- Supporting information appears to suggest the problems that residents have with the system are reducing rather than increasing
- There are alternatives which could be considered (double glazing, insulation of various parts of the building, replacement of some pipework, maintain the boilers (no Heat interface Unit (HIU's)) and then look at internal works)
- Why can't the new pipework be connected to the existing coils? Less disruption inside the flats

Officer's response: Sections of the existing pipework have corroded and become clogged. There are difficulties in refurbishing the existing heating system and it is not possible to connect the existing coils to the new pipework

so it has become necessary to consider an alternative heating system. See Existing heating system and its replacement section for further details.

Sustainability

- Continuing to operate with gas hinders ability to consider more sustainable heating options
- The proposed system is retrograde and a more sustainable, simpler, less disruptive 21st century solution should be considered.
- Retaining gas boilers is environmentally unfriendly
- How will the new system be designed to accommodate low carbon technologies in the future?

Officer's response: Due to the remaining life expectancy of the existing gas boilers the estate will continue to be heated using gas. Alternative energy efficient solutions will be considered when the existing gas network is to be replaced in the future. See Sustainability section

Heritage

- There will be extensive and irreversible harm to Grade II* interiors of 520 dwellings and exteriors of the Blocks A and B
- The proposed heating system is a departure from Neave Browns vision of social equality
- Works will deface the building with additional pipework and wiring which goes against Neave Brown's intentions.
- Surface mounting of pipework on the iconic fins of the buildings is unacceptable. Why can't internal risers be used?
- Current flats were designed to be radiator-free. Proposal will result in radiators based on current system which may not be compatible / suitable when the power source changes
- Works will damage the internal form and fabric of the building as well as its external appearance.
- This is a large scale development of Grade II* listed buildings and not "Residential minor alterations" which seriously impact the outside and damage the inside of the flats
- Running pipes up the fins of Block A and on the side of Block B would change the aesthetic of the estate without actually being any significant improvements

Officer's response: The appearance and location of the external pipework and its impact on the significance of the listed buildings have been considered. The type and location of the heat emitters form part of the separate planning and listed building applications (ref 2023/5339/P and 2024/0286/L). See Proposal and heritage section.

Maintenance / costs

- Proposed new system is expensive and high maintenance and is not in line with climate change objectives.

- Loss of warm fabric may result in emergence of condensation and mould and no suggestion has been made about how the new system would prevent this
- Health risks that could arise from the proposed potable water system
- Whittington Estate is a prime example of where the new heating system hasn't worked and residents have suffered for 6 years with an equivalent scheme which also combines old and new appliances.
- Lack of maintenance of the existing system which should be carried out rather than spending millions of pounds on an inappropriate system

Officer's response: The costs associated with the new heating system will be costed by the Council as freeholder. Condensation and mould has been considered – See Other Issues section; Issues associated with the HIU's installed in the Whittington Estate have been considered - See Other Issues section.

Concerns about quality of life / discrimination

- Disruption to the elderly, young families during the works would be unthinkable
- Internal alterations would significantly reduce the usability of the habitable rooms
- Residents would have to redecorate and / or replace floor coverings
- Repositioning or replacement of furniture that no longer fits
- Circulation / fire escape pathways within the flats would become too narrow for the disabled
- The proposal will create fuel poverty
- Condensation and black mould has not been addressed in the applications

Officer's response: Any works of repair and refurbishment will have a level of disruption and this will be proportionate to the scale of the works. Circulation within flats and fire escape pathways fall within the remit of Building Regulations. Condensation and mould addressed. See Amenity section and Other issues section

Consultation

- Parts of the application haven't been mentioned to residents of the estate (what are cold water storage tank rooms, new substations?)
- Believe Historic England do not know about the proposals

Officers response: It is appreciated that a significant amount of supporting documents and plans have been submitted. The cold water storage tanks

would be installed within a number of car parking spaces / garages under the blocks. All elements of the proposed works have been included in these documents. Historic England were consulted about the applications and have formally commented on them. See Consultation section for further details.

Disruption

- Most residents horrified by the proposals once they understand the likely upheaval entailed
- Removal of existing floors to install pipework if pipes are taken from radiator to radiator and floor to floor to connect with the HIU
- Why has Camden submitted application for refurbishment programme before the heating consultation was completed as the refurbishment works will be affected by any new pipework, skirting boards, flooring
- Why is the application referred to as residential minor alterations when a full heating system will be a major upheaval to all residents if suggestions go ahead. Full heating elements and how Camden proposed to accommodate all the different flat designs (heights of skirting boards) and conditions needs to be undertaken before any application is considered.

Officers response: Any works of repair and refurbishment will have a level of disruption and this will be proportionate to the scale of the works. See Other Issues and Amenity section for further details. Detailed surveys of the flats will have to be undertaken prior to the commencement of any works. See Heritage section for further details.

Costs associated with the works

- No costing provided for the scheme as a whole
- Costs are crippling and local residents will be left to pay for the mistakes
- Costs for leaseholders associated with the major works which is a significant burden in the current climate for families
- The Council don't think much about leaseholders and don't include local residents in their projects, ideas and what is best for everyone. Local residents should have a stronger influence
- Every single year the residents are expected to expend a lot of money in major works and the Council doesn't give leaseholders much time to think about it they just go ahead. The works are always huge and extremely expensive. Some appear unnecessary and other could wait.

Officers response: The costs associated with the works are a matter between the council as freeholder and the leaseholders and tenants. The planning considerations relate to whether the proposals are in accordance with the

development plan and preserve the significance of the listed building or harm is otherwise outweighed. See Other Issues section

Size of works

- Not minor works as categorised. Works will involve gutting of 22 garages under block B to install 2 water tanks in each garage.

Officers response: The proposed works are categorised in terms of the uplift in floorspace. As the proposed works do not result in an uplift of over 1000 sq. m they are categorised as minor works. See Other Issues section for further details.

Complex supply

- Water supplying the estate with mains water pumped to the roof top storage tanks will now have to be maintained by Camden Council rather than Thames Water adding another layer of complexity.

Officer's response: Responsibility for water supply falls outside of planning considerations.

Lack of detail in the proposals

- No details of the aluminium circular pipe housing
- New servicing will not follow existing routes as claimed
- Redundant pipework would not be removed

Officers response: Details of materials and specific external pipework routes (including removal of any redundant pipework) will be secured by planning conditions.

6. POLICY

National and regional policy and guidance

National Planning Policy Framework 2023 (NPPF)
National Planning Practice Guidance (NPPG)
Adapting Historic Buildings for Energy and Carbon Efficiency Historic England Advice Note 18 (2024)

Local policy and guidance

Camden Local Plan (2017) (CLP)

Policy A1 Managing the impact of development
Policy A3 Biodiversity
Policy A4 Noise and vibration
Policy D1 Design
Policy D2 Heritage
Policy CC1 Climate change mitigation
Policy CC2 Adapting to climate change
Policy T2 Parking and car-free development

Supplementary Planning Documents and Guidance

Most relevant Camden Planning Guidance (CPGs):

Access for All CPG - March 2019
Amenity - January 2021
Biodiversity CPG - March 2018
Design - January 2021
Energy efficiency and adaptation - January 2021
Housing - January 2021
Transport - January 2021

Other guidance:

Alexandra Road Estate Conservation Area Statement (CAS) 2000

Draft Camden Local Plan

The council has published a new Draft Camden Local Plan (incorporating Site Allocations) for consultation (DCLP). The consultation closed on 13 March 2024. The DCLP is a material consideration in the determination of planning applications but has limited weight at this stage. The weight that can be given to it will increase as it progresses towards adoption (anticipated 2026).

7. ASSESSMENT

7.1 The principal considerations material to the determination of this application are considered in the following sections of this report:

8	**Existing heating system and its replacement**
9	**Sustainability**
10	**Heritage and design**
11	**Amenity**
12	**Applicant Consultation**
13	**Transport**
14	**Other issues**
15	**Biodiversity**
16	**Planning obligations**
17	**Conclusion**
18	**Recommendations**
19	**Legal comments**
20	**Conditions – planning permission**
21	**Informatives**

22	**Conditions – listed building consent**
23	**Informatives**

8. EXISTING HEATING SYSTEM AND ITS REPLACEMENT

Existing heating system

8.1 The Alexandra Road Estate heating and hot water is supplied via a communal heat network. The distribution pipework for domestic heating and hot water is still the original installation when the estate was constructed between 1972 and 1978 and as such is over 50 years old. The existing system includes embedded heating coils in every other dividing party concrete wall of each of the flats / maisonettes providing a shared source of heating between pairs of flats (with the exception of Block C which has heating coils on both party walls). The heating coils provide space heating for the dwellings either side. The tails are the connection points between the embedded heating coils and the network distribution pipework. The heating coils are supplied with heat from the boiler plant between October and April. The existing boiler plant operates all year round to provide domestic hot water. The diagram below shows how the communal heating system operates.

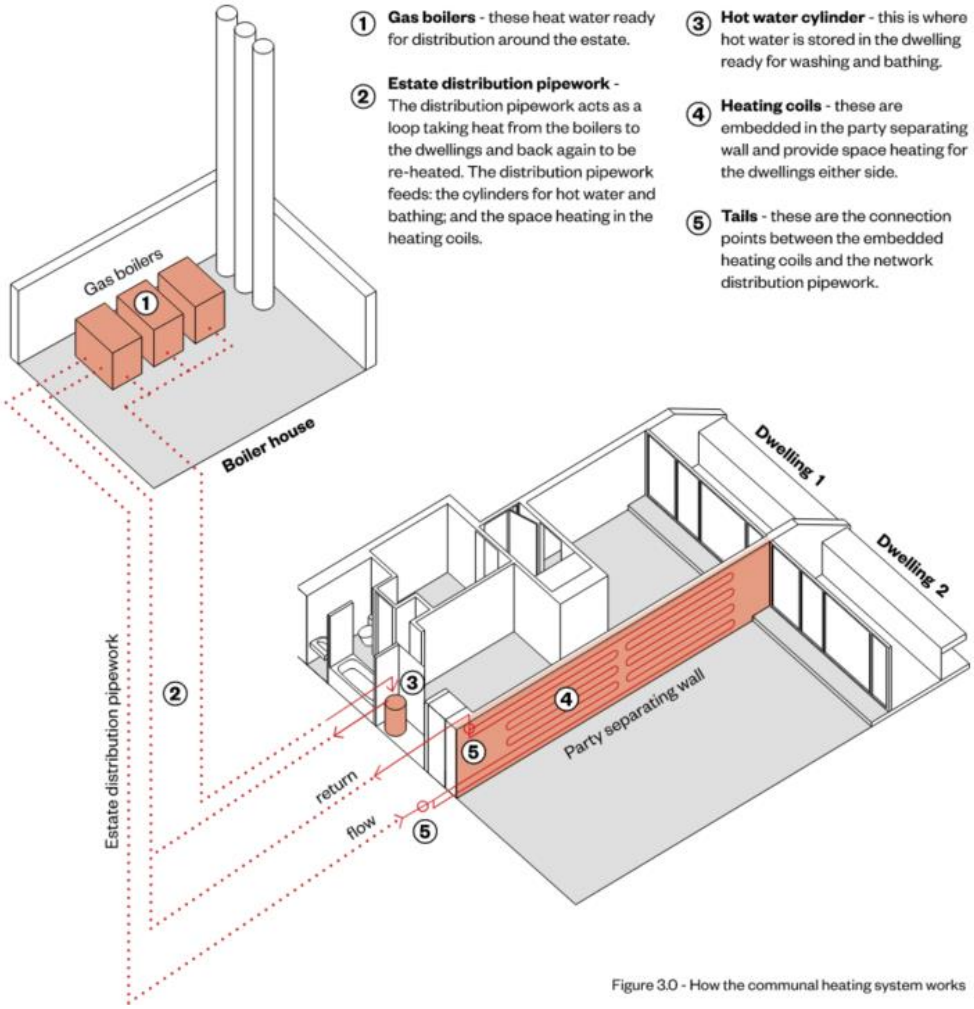


Figure 3 (above): Diagram showing how the existing communal system operates.

8.2 The design of the heating system was primarily required to meet 3 main criteria:

- Installation of a heating system which did not obstruct the walls in order to avoid obstruction caused to furniture positions
- Design a form of heating that would avoid the likelihood of condensation in dwellings by being cheap to run. Initially it was felt acceptable to sacrifice some measure of individual control by the residents to achieve this. This was later revisited with some resident control of heating
- The soundproofing of the rear of Block A and the likelihood that the windows would remain shut to ensure additional sound resistance led to the need for mechanical ventilation to the rooms at the rear facing the railway.

8.3 For many years the pipework has suffered from extreme corrosion, furring-up and leaks, presenting challenging maintenance issues and an unreliable heating and hot water supply for residents. It is not clear if the degradation of the pipework has been through general lack of maintenance or difficultly

in accessing the internal pipework to carry out maintenance. Notwithstanding this, the applicant (Camden Council) has to compensate any residents who experience a loss of heating or hot water which is not cost-effective.

8.4 Although the capacity and temperature of hot water has been increased to the dwellings across the estate the applicant has advised that some of the dwellings which are furthest away from the boiler house have been provided with individual gas boilers to ensure they continue to receive sufficient heat. Where hot water to dwellings has failed an electrical immersion cylinder has been provided to ensure residents still have access to hot water. Other issues associated with the existing pipework include water leaks which results in a loss of water pressure, disruption to supply and associated costs of repair.

8.5 The issue of the maintenance of the existing heating system and the need to replace the existing original heating wall coils which are embedded within the walls of the flats has been raised by the local residents of the estate as well as local groups. Pressure testing of a sample of the heating coils within Block B were undertake to understand their condition and reuse. It was found from the sample that the coils were in a serviceable condition. This testing also provided the opportunity to review the state of the connection tails and valves. However this was not completed due to difficulties in accessing the tails which required breaking open sections of wall and flooring within certain flats. Figure 4 below illustrates the heating coils, tails and valves embedded within the concrete walls in Block A.

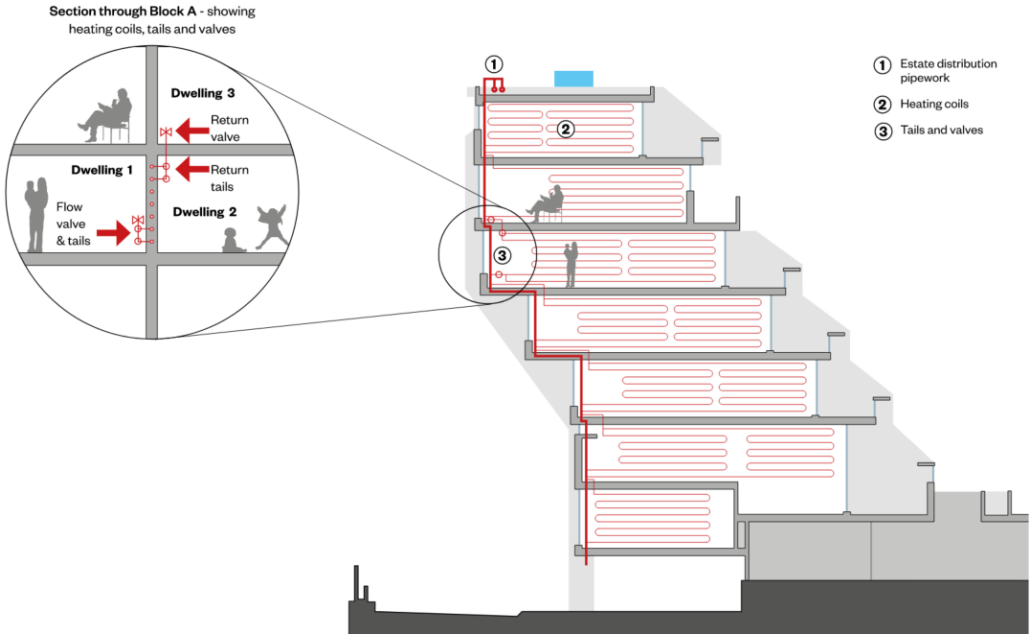


Figure 4 (above): Section through Block A showing the distribution pipework

8.6 Ways to repair the coils have been considered by the applicant. Suggested options such as using epoxy lining to rehabilitate damaged pipes without the

need for full pipe replacement were reviewed by the applicant. The applicant has advised that relining of small bore pipework which is used at Rowley Way is not appropriate as it is only used in large bore pipework used in sewers and water and gas mains. Blowing epoxy resin through small bore water and heating pipes was also considered but was found to be a process which is not widely used in the UK thereby limiting supplier choice. The applicant confirmed that even if lining of the embedded wall coils was possible as well as replacement of the tails specific issues would not be addressed. This includes lack of space temperature control within each flat to suit personal comfort requirements, and continuation of occurrences of heating "over shoot" from heat output which can require the need for windows to be opened to adjust the temperature within the flats making it less energy efficient.

8.7 The option to replace the tails serving the wall coils has been raised by local residents. The applicant has advised that attaching new tails to the older infrastructure may increase their potential to fail in the future.

8.8 Some residents have referenced a similar district heating system which operates at the Churchill Garden Estate in Pimilco. Of the 51 blocks which make up the estate 8 are Grade II listed buildings as well as the landscaping areas within which the estate sits. The estate is located in the City of Westminster. It is claimed that this has been maintained properly and continues to use the original heating system suggesting that this could be the case at the application site. It is not clear if the heating system is identical to the one at Alexandra Road Estate or possible to verify if this estate has experienced problems with its district heating system. As the estate is not in Camden it is not possible to make a direct comparison between the estates.

8.9 It must be noted that planning permission and listed building consent were **granted** in November 2020 under delegated authority following Member's Briefing for the replacement of the heating system (see planning history above). This included installation of new heat interface units (HIU's) in the cupboards in each of the flats following removal of the existing hot water cylinder. Works to install the HIUs and associated pipework were undertaken in 2 uninhabited flats at nos. 26A and 46A Rowley Way (referred to as the pilot flats) in January 2022. The current planning and listed building applications includes a similar scope of works. The main changes between the 2020 permission and the current applications are the additions of the new cold water storage tank rooms in the basement car parking spaces, and changes to the size and location of the pipework routes. There has been no material changes in circumstances relating to the site context since the 2020 permissions. At national level the National Planning Policy Framework (NPPF) was updated in 2023. Paragraphs 164 requires local planning authorities to support renewable and low carbon development, and to consider the proposal's contribution to a net zero future. The London Plan

was adopted in 2021. The previous applications were assessed under the policies in the Camden Local Plan which is still the statutory Local Plan and the Camden Planning Guidance documents have been updated in 2021. Due to the policy framework within which the previous applications were assessed and determined, the 2020 planning permission and listed building consent are a material planning consideration in the assessment of these applications and they have been given significant weight in this assessment. Whilst the policies themselves have not evolved significantly since then, the weight attributed to climate change mitigation and adaption has with a growing importance and urgency attached to energy performance and resource efficiency.

8.10 The future reliance on the original heating coil pipes and tails within the concrete walls of the flats to continue to provide heating to the estate appears challenging without either upgrading / replacing the existing pipework. It has been confirmed that this will require either extensive invasive works into the listed building fabric within some of the flats in the estate or require the use of processes that could result in additional pressure on the existing distribution pipework. This would not only result in damage to the fabric of the historic buildings but would also fail to address other outstanding issues such as overheating within the flats which in itself results in heating loss and inefficient energy consumption. Although regrettable, it is considered that the principle of replacing the heating system is accepted.

9. SUSTAINABILITY

Policy context

9.1 In November 2019, Camden Council formally declared a Climate and Ecological Emergency. The council adopted the Camden Climate Action Plan 2020-2025 which aims to achieve a net zero carbon Camden by 2030.

9.2 In line with London Plan (LP) policies, SI1, SI2, SI3, SI4, SI5 and SI7 and Camden Local Plan (CLP) policies CC1, CC2, CC3, and CC4, development should follow the core principles of sustainable development and circular economy, make the fullest contribution to the mitigation of and adaptation to climate change, to minimise carbon dioxide emissions and contribute to water conservation and sustainable urban drainage.

9.3 The Alexandra Road Estate is a significant contributor to the council's carbon footprint. It is one of Camden's highest consumers of gas (by communal system). Tackling the poor performance of these buildings is important in delivering the environmental objectives of the development plan and the council's strategic vision.

9.4 The existing communal gas boiler plant is to be retained as it was installed in 2014 and has residual service life remaining which is currently estimated as another 10-15 years life expectancy. The boilers are low NOx (below

40µgNOx/kwh and an energy efficiency rating >90%). These boilers were installed prior to 20th December 2018 implementation of the Medium Combustion Plant Directive (MCPD). As the communal boilers were installed relatively recently (10 years ago) and are still operational it is considered reasonable to retain them until the end of their life. There is a balance between resource efficiency (like reusing existing infrastructure where possible and in good condition) and a move to a de-carbonised grid. The site distribution system (pipework between boiler plant and homes), heating emitter coils in party walls and hot water cylinder in each home are approximately 50 years old and require maintenance, and replacement. It is not possible to replace the system on a like-for-like basis due to the embedded nature of the coils within the poured concrete walls and difficulty in accessing the connection points as detailed in section 7 above.

9.5 Local residents have suggested where heating has failed in certain identified flats these flats should be targeted outside of a whole building retrofit until further considerations have been given to alternative energy sources. It is proposed to replace all pipework within the estate due to concerns about the state of the existing pipework that serves the heating coils. Works would not be limited to individual flats. Piecemeal retrofitting of the buildings whereby individual fabric elements are upgraded in isolation of each other could lead to harm to the fabric of the listed buildings. Therefore a whole building retrofit plan has been put forward to take account of the heritage status, the reduction in carbon emissions, running costs and better control the intrusiveness of the works.

Heating options

9.6 Local residents consider other heating options have not been fully explored, including the installation of electrical heating or gas combination boilers in each dwelling or more energy efficient solutions such as air source heat pumps and PV panels which may not require the same level of service runs as are currently proposed, and would be less disruptive to install both to the buildings and to residents.

9.7 A matrix of heating options has been considered including: individual gas boilers, individual air source heat pumps, and individual direct electric connection. These were assessed against carbon emissions, heritage impact, capital cost, running cost, reliability/maintenance, disruption on installation, and future climatic resilience. This concluded that the majority of options were not explored further at this stage as they raised a number of issues including technical performance limitations, impact to the listed buildings, costs, and disruption to local residents. A summary of the various heating options that were considered are provided below:

Individual gas boilers

9.8 Installation of Individual gas boilers are not being considered as these are not future proofed and will not allow the Estate to be fossil fuel free in the future. The Committee on Climate Change has advised the Government against the installation of gas boilers in new homes from 2025 and in existing homes from 2035. The Council's planning team resists the use of new gas infrastructure in developments given this issue, and would only normally support use of existing infrastructure. It is acknowledged that individual boilers may reduce the extent of distribution pipework across the estate however this must be balanced against the fact that it would be necessary to install individual flues for each flat through an external wall to safely remove any harmful waste gases into the atmosphere. Due to the stepped nature of elevations of Blocks A and B this could result in pipework from each of the flats extending up on the northern or southern elevations which could have a harmful visual impact on the elevations of the block. There are also air quality impacts to burning gas. Overall, this solution will not be conducive to meeting Camden Council's climate change commitments and could result in harm to the heritage assets (the listed building and the conservation area) and for these reasons are not being carried forward as an option. Individual electrical heating alternatives were also considered however this was considered to be more disruptive to residents in the future and will have a major impact on tenant's fuel poverty. They may also be incompatible with the heating emitters that form part of works associated with a separate application (see planning history for details).

District heating network

9.9 The estate is an existing communal heat network. The nearest alternative existing heat network is Kings Cross / St Pancras and the nearest proposed heat network is Kilburn Park. Neither network is feasibly close to the estate and were not considered practical.

Ground source heat pumps (GSHP's)

9.10 Preliminary desktop studies prepared by the applicant concluded that approximately 150 to 200 boreholes might be required with up to 10,000 sq. m of land to fit the boreholes necessary to provide the heating system required for the estate. These were not considered as a design option for the current project due to the presence of extensive existing services concealed below ground (gas, water, electric, communications, foul drainage, surface water drainage etc). In order to install vertical heat exchangers, these would be required to be piled into the ground up to 100m deep and would have to be hydraulically linked together to achieve a constant all year round ground temperature of 10 degrees. The GSHP design was not considered a design solution at this stage as it was considered that it would not achieve the significant heat load associated with the whole estate.

Solar panels

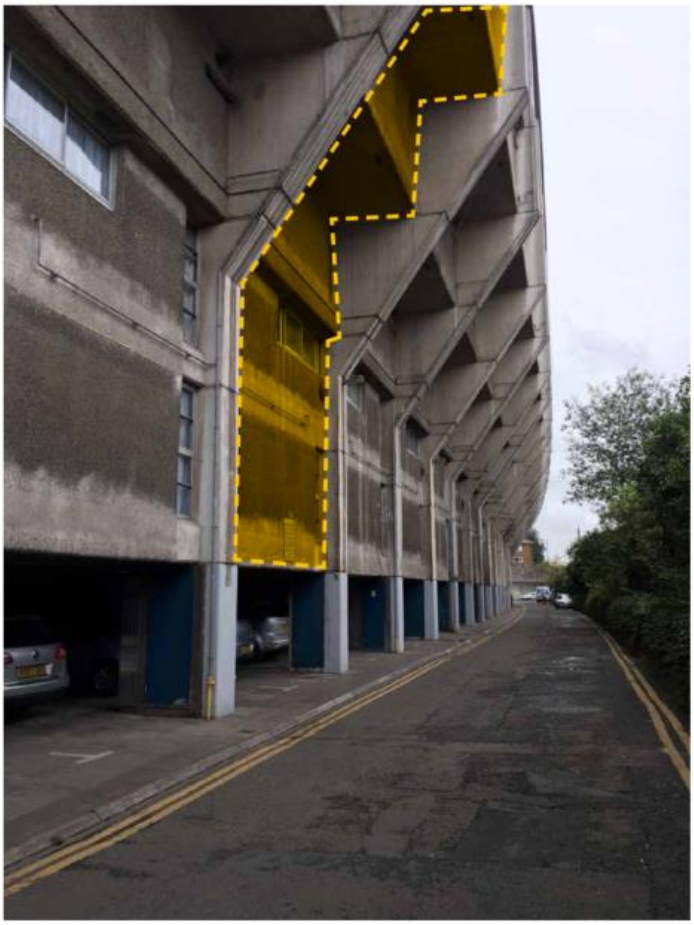
9.11 Roof mounted solar panel arrays were considered as an optional renewable technology. The applicant has advised that completely covering each roof realises a modest contribution to a typical flat's annual energy use so would have to be used to injunction with other heating supplies. It must be noted that there is existing plant on the roofs of the blocks and pipework associated with the existing water tanks and other equipment. The applicant has estimated that approximately 15-30% of the total roof space is available across all the roofs which restricts the quantum of electricity that would be required to serve the estate. Local residents have advised that existing redundant pipework on the roofs of the blocks limits the availability of useable roof area to install more energy efficient technology. The applicant has confirmed that solar panels will be considered as part of a second phase of works to the estate. Due to budgetary pressures on the Council's capital budget it has not been possible to cost this as part of this scheme, but it has not been ruled out as a supplementary intervention in future. A condition would be attached to any permission requiring the applicant to submit a survey of all existing pipework across the estate, following the decommissioning of the existing heating system, to ensure all redundant pipework will be removed.

Air source heat pumps (ASHP's)

9.12 The installation of ASHP's is considered one of the better options to replace the existing communal gas boilers when they come to the end of their natural life. It is a more efficient way to use electricity to generate heat thereby increasing the energy efficiency of the heat network on the estate. It must be noted that ASHP's work best in efficient homes that are well insulated otherwise the heat pumps may have to work harder to keep the home warm which can increase electricity consumption. ASHP's work with heat emitters – for example radiators or underfloor heating. Radiators generally need to be larger than traditional radiators. This is because ASHP's operate at lower temperatures than boilers, so a larger surface area is needed to achieve the same amount of heat. Installing individual ASHP's and associated pipework in every flat with the external heat pumps located potentially on the external balconies will have to be carefully considered to ensure there any visual harm to the appearance of the building is limited. The existing gas boilers are 10 years old and are not at the end of their life. As the existing gas boilers are still viable their replacement with new green technology would undermine the principles of the circular economy in terms of reuse which are also an important consideration in the assessment of the proposal. The applicant has advised that ASHP's will be considered as part of a second phase of works to the estate. Due to budgetary pressures on the Council's capital budget it has not been possible to cost this as part of this scheme, but it has not been ruled out as an intervention in future.

Internal and external insulation

9.13 The thermal performance of the fabric of the existing buildings is typical of its time, with minimal insulation provided. Concerns have been raised by local residents about the lack of consideration around additional insulation of the buildings envelope. It must be noted that in early 2000 the roofs and terraces of the flats within the estate were insulated with 50mm of extruded polystyrene insulation applied to the roofs and 60mm to the terraces. The options to install both external insulation and internal insulation were considered by the applicant. These options included external insulation on the north elevation of Block A (excluding the fins) (see Figure 4 below). This would comprise re-cladding of the board-marked concrete and render. . A study of insulation options for all the blocks on the estate established that the application of external render to the concrete and rendered walls of the building envelope would harm the special interest of the grade II* listed buildings designed by Neave Brown and Camden Architects. Likewise, internal insulation would harm the interiors of the dwellings by altering the proportions of rooms and by compromising historic joinery fittings and fixtures. These options were considered by planning and conservation officers, and it was felt that the wall insulation, particularly external wall insulation, would have resulted in notable harm to the significance of the buildings, and the conservation area, with the harm likely to be at the upper end of less than substantial. Minimising the harm would have result in limiting the insulation to the areas on the large flank walls, but this would have had much less impact on the energy performance.



Rear of block A

Figure 5 - Typical area of insulation on the northern elevation of Block A which has been discounted as one of the possible insulation options

9.14 Better insulation of the roofs was raised by local residents during the consultation process as a possible option. It must be noted that roof insulation work was carried in during the 2000's.

9.15 Installation of a layer of insulation to the inside walls of the flats was also explored. It was considered that the internal insulation would harm the interiors of the dwellings by altering the sizes and proportions of rooms and by compromising historic joinery fittings and fixtures particularly around the junctions between any cladding and the existing window frames. It was therefore discounted as an option due to the level of harm from those options considered would likely range from moderate to high depending on the intervention and location.

9.16 Overall, a range of potential heating systems have been reviewed to help determine a suitable replacement heating system for the Estate in conjunction with improving the thermal envelope of the existing building. This concluded that the majority of options were not explored further at this stage as they raised a number of issues including technical performance limitations, impact to the listed buildings, costs, and disruption to local

residents. Retention of the existing communal gas boilers with the potential to introduce a heat pump system is considered to provide the greatest flexibility in the future.

9.17 A comparison of carbon emissions between the existing and proposed heating networks was undertaken. This was based on the heating energy consumption between 1st October and 30th April. The overall result found that the new heating system reduced energy consumption by around 30% compared with the current heating system with a reduction in CO2 emissions of 60%. This will help to reduce heating demand across the estate.

Other concerns associated with the proposed heating choice:

Heat interface unit (HIU)

9.18 Many of the objectors are concerned about the proposed installation of HIUs in each flat, and its potential to reduce more sustainable heating choices in the future. The installation of a heat interface unit (HIU) would not limit or change the options for internal space heating distribution within the flats. The HIU would contain the return temperature limiters which are required to work with future heat pump technology including connection to possible ASHP's. The added benefit of the HIU's includes the adjustable setting to control the heating with a background heating setting which would allow residents to have more personal control over their heating in terms of maintenance and costs.

10. HERITAGE

Policy and legal context

10.1 The application site is located within the Alexandra Road Estate Conservation Area, wherein the Council has a statutory duty, under section 72 of The Planning (Listed Buildings and Conservation Areas) Act 1990, to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

10.2 The estate includes Grade II* and Grade II listed buildings and the Council has a statutory duty, under Sections 16 and 66 of The Planning (Listed Buildings and Conservation Areas Act) 1990, to have special regard to the desirability of preserving a listed building, its setting, or any features of special architectural or historic interest which it possesses.

10.3 Policy D1 of the Camden Local Plan seeks to secure high quality design in development and Policy D2 notes that the Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas and listed buildings

Plant enclosures

10.4 Where new plant enclosures are required, they will be clad with metal louvres or perforated sheets for ventilations, which will have a neutral grey or black metallic finish to complement the estate's concrete megastructure. It is considered that the new sub-plant rooms and alterations to the existing boiler house will have minimal impact on the appearance of the concrete megastructure of the estate, as both the enclosures and associated pipework will be designed to be reversible and visually recessive.

10.5 All operations are, or will be, located in areas of secondary importance at lower level adjacent to existing service areas and away from the residential areas of the estate. It is accepted that the under-stair plant room will require the removal of a brick and concrete plinth at ground level to accommodate sufficient head height.

10.6 A salvage (salvageable materials) condition will be attached requiring bricks to be stored on site for future re-use on the estate, where the bricks can be salvaged from the demolition of the existing historic plinth adjacent to the boiler house. A condition will also be attached relating to the design of the boiler and plant enclosures including detailed drawings showing typical details of junctions with historic fabric, facing materials, colours and finishes, profile details and methods of fixing.

Distribution pipework routing

10.7 The proposed replacement distribution pipework will exit the existing main boiler room and will be routed to four destinations comprising the sub-plant room A in the north, sub-plant room B in the west, Blocks C1-C3 in the south and the Loudoun Road and Alexandra Place blocks in the east. New services pipework from the existing plant room will follow similar routes as existing pipework, which will only be removed once the new system is operating to ensure an uninterrupted changeover. A condition will be attached to any permission to ensure this. A condition will also be attached requiring full details of all typical pipework design and service routes, showing how pipework will be fixed to historic fabric and how it will penetrate the existing building envelope.

External Works to Block A

10.8 Block A is located to the north of Rowley Way and is bounded by the railway line that lies to the north (see figure 5 below).

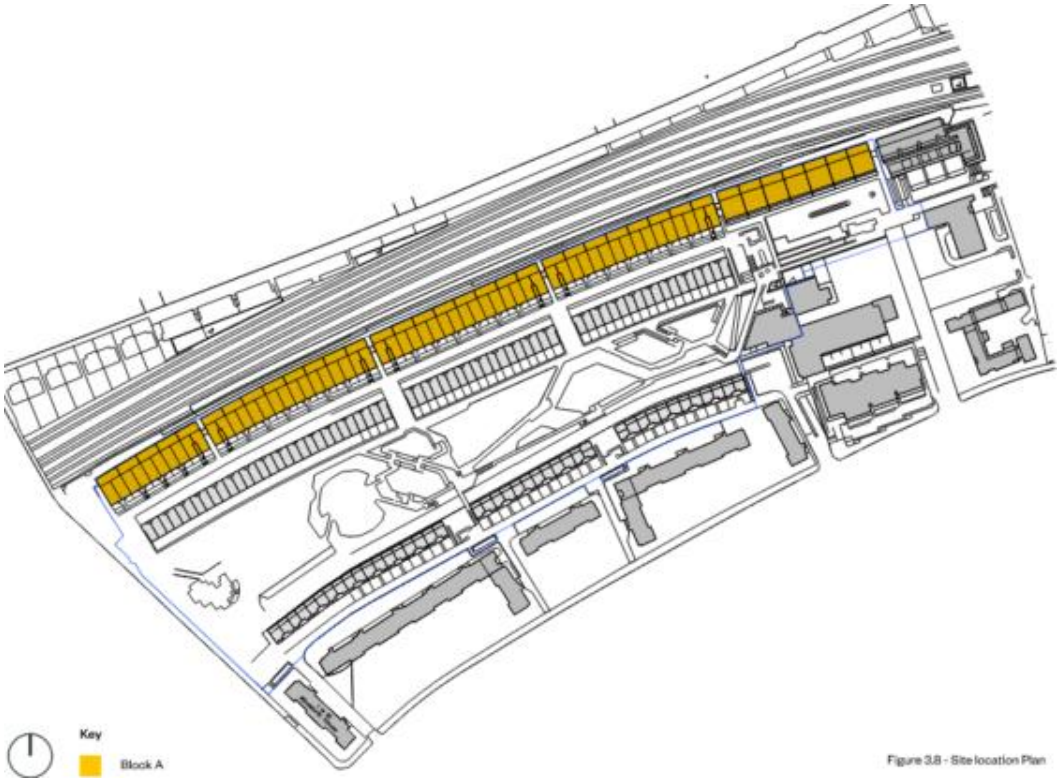


Figure 5 - Location of Block A flats

10.9 Under Block A5, the new pipework will be weather-proofed and fixed against the existing soffit with no housing to allow for maximum head height. On the rear of Block A, the pipes turn and run briefly at high level before turning up internally within the lift enclosure area and rising to roof level. On the north of Block A5, the pipes will turn individually, clad in weatherproof wrapping to match the colour and finish of the concrete as closely as possible. A condition requiring the colour of the wrapping to match as closely as possible will be attached to any permission.

10.10 Hot water heating pipes will be located on the roof of Block A and over the north edge down into the dwellings below, via vertical pipework on the rear fins on the north elevation, avoiding the need for vertical pipework on the walkway elevations on the south side. Heating pipework will distribute at roof level then drop in smaller 160mm diameter pipes to pairs of individual dwellings, on the rear face of every other fin. Mains water will rise from the ground through pipework on the same fins. The pipework will be fixed to the concrete with a strut channel and threading fixing. Horizontal pipework will then connect these routes to each flat, stepping out around the existing gas pipes which will remain in situ as they are used for cooking in the majority of flats.

10.11 The penetrations through to the existing flats will be positioned sensitively in terms of visual and structural impact on the external envelope and internal layout of each flat. The pipes will access each dwelling through localised core-drilled holes either side of each party wall, and will travel to the internal

HIU, maximising concealed routes at low level behind existing fittings. Due to the visual prominence of the row of concrete fins on the north elevation of Block A, facing the railway line, a condition would be attached to any permission requiring that a mock-up of all proposed service pipes be constructed on a single fin, to be agreed in consultation with Historic England.

External works (Block B)

10.12 Block B is located to the south of Rowley Way (see Figure 6 below) and the buildings are Grade II*.

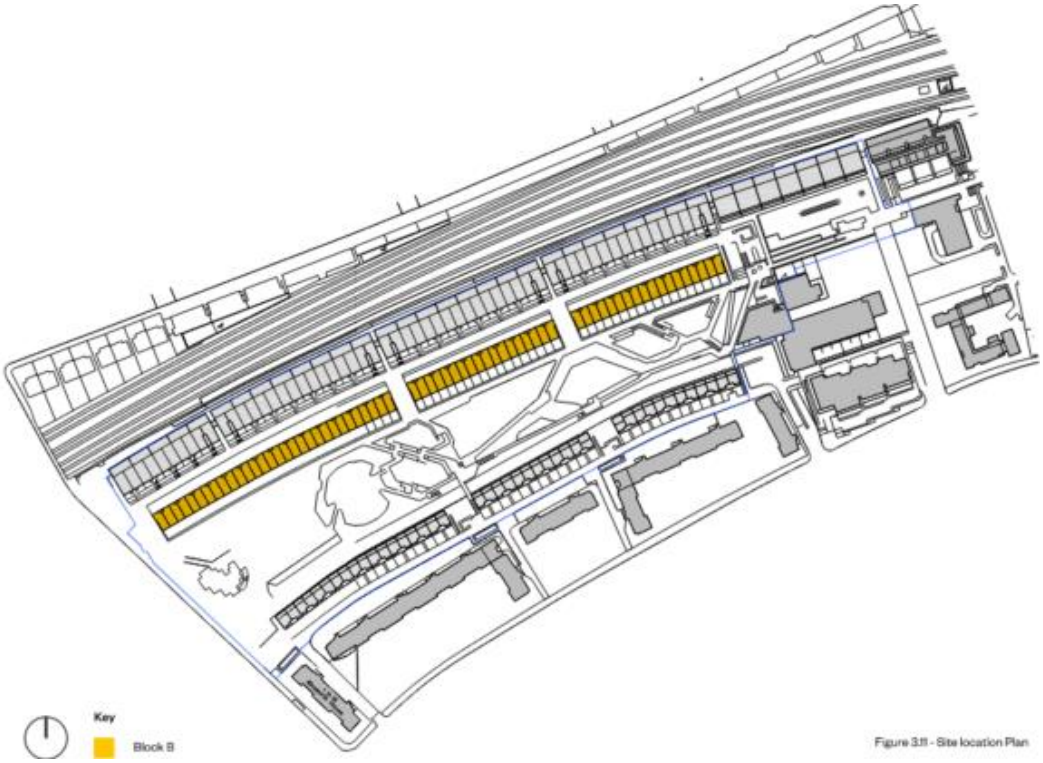


Figure 6 - Location of Block B flats

10.13 Heating distribution pipes will drop through the slab of the proposed sub-plant room B to car park level and will follow the route of the existing pipework under Rowley Way. The pipes will be weather-proofed and fixed directly to the soffit with a wrapping to match the colour and texture of the concrete. A condition will be attached to any permission to ensure that this is carried out.

10.14 The distribution pipework serving the upper maisonettes in Block B will be visible from the upper flats in Block A, as they will run the length of each block at roof level. However, to mitigate any negative visual impact, they will be positioned to the south of the existing water tanks. The installation will be of a reversible nature, comprising a lightweight self-supporting internally-braced structure requiring no direct fixing to the roof construction which could damage existing waterproofing layers.

External works (Block C)

10.15 Block C is located to the south of the site (see Figure 7 below) and the buildings are Grade II*.

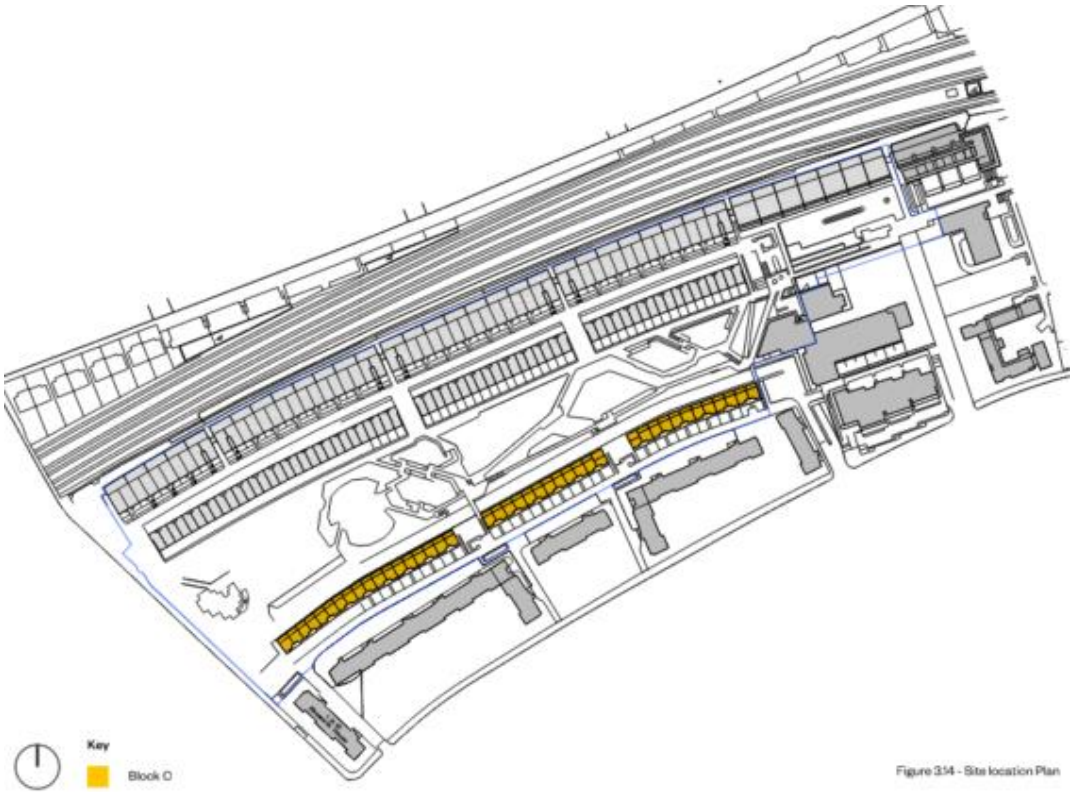


Figure 7 - Location of Block C flats

10.16 Heating distribution pipes to Block C will run from the existing boiler room along the underside of the existing pedestrian bridge via the upper level of the community centre to Block C. The pipes will be clad in an insulated sleeve with a metal finish to complete the existing concrete finishes, and will have strut channel and threaded rod fixings to maximise reversibility. The pipework will then run down the structural wall to the north east corner of Block C3 and into the void below the external stairs, leaving via a panel over an existing doorway and along the soffit of a sheltered walkway into the easternmost garage.

10.17 As with the lower maisonettes in Block B, the pipes will pass directly through the concrete slab via core-drilled apertures adjacent to the party walls to serve the properties which are single-family dwellings. The service runs for Block C will have a lesser visual impact than for Blocks A and B, as the majority of works will be internal or underground.

Loudoun Road / Alexandra Place

10.18 Heating distribution pipework serving the dwellings in the two grade II blocks on Loudoun Road and Alexandra Place will follow existing routes from the boiler house via the landlord's store and school, before emerging at the crossing over the east service access road to Rowley Way, continuing below

Langtry Walk, and turning below ground to feed the Loudoun Road block to the north and Alexandra Place to the south. On the Loudoun Road block, pipework will rise to first-floor level, via the east elevation to the north of the existing external staircase. The issues relating to routing of pipework in these two blocks is less sensitive than in the concrete blocks, as the principal building materials are brick and concrete and the interiors are of lesser historic and architectural significance.

Internal works

10.19 The proposal would include the installation of HIUs. The HIU's are also included in a separate listed building application in the other set of applications which are also pending consideration (ref 2023/0286/L). The HIU's would be located in a cupboard where the existing water tanks are located (see figure 8 below). It is proposed to retain the original cupboards and shelves wherever possible. In flats were existing cupboard shelves or sliding doors are warped, rotting or damaged, these are to be made good. A condition would be attached to any listed building consent requiring the submission of these details prior to commencement of any works on site to ensure the works do not harm the historic fabric of the listed buildings.

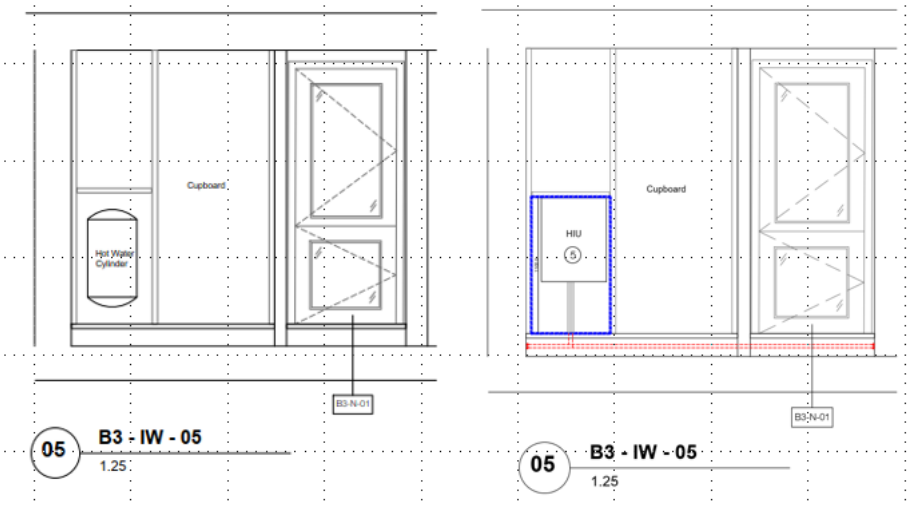


Figure 8 - Existing (left) and proposed (right) elevations of the existing water tank and proposed HIU in a typical location within the cupboards

10.20 It is considered that the proposed works has been developed in close association with the Council's planning and conservation officers and with Historic England where joint site visits have been undertaken since 2020 to the estate in association with these works. Due to the large-scale nature of the works affecting an enormous concrete infrastructure accommodating 520 dwellings, by necessity the level of detail provided offers servicing solutions which take into account the existing condition of the heating distribution pipework, the special historic and architectural interest of the estate including dwelling layouts, and internal heating solutions for each dwelling type.

10.21 The service runs on the fins on the north (rail-line facing elevation) would be the most prominent and could be seen from several vantage points, including from the railway. Although visible, this elevation is a secondary elevation – indeed the design of the estate is to turn its back on the railway and allow light and open housing near rail infrastructure without the normal impacts (or at least lesser ones). Whilst the simplistic and plain design of the north elevation makes some contribution to the significance, the iconic elevations and views of the estate are from the avenue to the south of Block A. What contribution the utilitarian rear elevation makes to the significance is carefully considered through the repetitive and standardised approaches to the service runs. As such, whilst there is no harm caused by most of the works, including the enclosure of undercroft areas, removal of internal water tanks, and installation of the HIU's, the service runs on the north elevation of Block A cause less than substantial harm to the significance of the block and the estate through its setting. However, the careful positioning of these runs, and the repetitive and standardised approaches to them, minimise the harm to the lowest end of the scale.

10.22 The iconic elevations are preserved and there is no harm to the character and appearance of the Alexandra Road Estate Conservation Area, or to the setting of the Alexandra Road Estate Park which is a Grade II* listed Registered Part and Garden. The very minimal amount of harm has been afforded considerable weight, but it is outweighed by public benefits of long term preservation of the estate and improved accommodation for iconic housing which includes affordable housing.

10.23 Concerns have been raised by local residents about the construction works and how this will be carried out to ensure the protection of the historic fabric during these works. The concerns particularly relate to the potential removal of historic fabric. Camden Council produced a Heritage Partnership Agreement in 2016 which was approved in 2017. The consented works in the Agreement were limited to those works listed in the description of consented works which were necessary to deliver the "Better Homes Programme". The works mainly focused on improvements to the kitchens and bathrooms plus re-wiring within the dwellings. The applicant has confirmed that this document would be used to inform discussions with contractors prior to the commencement of any works on site.

10.24 Local residents have suggested where heating has failed in certain identified flats that these should be targeted outside of a whole building retrofit until further considerations have been given to alternative energy sources. It is considered that targeting individual flats could led to piecemeal development which may result in works being carried out to individual flats that may not be appropriate across the entire estate. Therefore, a whole building retrofit plan has been put forward which has been informed through consideration of a variety of issues including alternative heating options, heritage impacts

as well as reduction in carbon emissions, running costs and intrusiveness of works.

11. IMPACT ON NEIGHBOURING AMENITY

11.1 CLP policies A1 and A4 and the Amenity CPG are all relevant with regards to the impact on the amenity of residential properties in the area, requiring careful consideration of the impacts of development on light, outlook, privacy and noise. Impact from construction works are also relevant but dealt with in the 'Transport' section. The thrust of the policies is that the quality of life of current and occupiers should be protected and development which causes an unacceptable level of harm to amenity should be refused.

11.2 Given the siting, scale and nature of the proposed plant and ducting they are not considered to result in any harm to the residential amenities of neighbouring properties in terms of daylight, sunlight or loss of privacy.

11.3 The proposal includes plant that will be housing within sub-pump / pump rooms. The majority of the pump rooms do not require ventilation with the external façade comprising a solid panel with solid access doors. Sub-pump room A5 and B5 require ventilation with the need to include an acoustic louvre and access door. The mechanical plant will be required to operate over a 24 hour period. A revised noise report has been submitted in support of the application. Appropriate noise guidelines have been followed within the report. The plant noise criteria have been adequately predicted taking into consideration distance losses, surface acoustic reflections and, where applicable, screening provided by the building. The assessment indicates that the proposed plant along with suggested mitigation measure should be capable of achieving Camden's environmental noise criteria at the nearest and potentially most affected noise sensitive receptors. The plant will be required to include ant-vibration measures. The Council's Environmental Health officer has reviewed the information and is satisfied the findings in the noise report meets the Council's local plan policies subject to standard noise and anti-vibration conditions.

11.4 They are also concerned about the noise emitted from the HIU's. The applicant has confirmed that this would be less than 30 dB in a bedroom which would be similar to the noise of a fridge.

11.5 Local residents are concerned about the construction process in terms of the noise and disturbance associated with the works. Building works are disruptive and are part of any development scheme. Despite being temporary, they tend to have a more notable impact on certain groups including those with protected characteristics. For example, the elderly and very young (age) are more likely to be at home during working hours so the impacts on them will be greater, along with carers or parents. Disabled people may also be at home for longer periods (disabled people have

significantly lower employment rates than those without a disability) and certain groups (for example the young, old, and neuro diverse) may be more affected by noise and disturbance than others. Those with mobility constrains (disability) can also find it more difficult to navigate areas where there are temporary construction or works enclosures than can affect access on a temporary basis. That said, the nature of the works means that these additional impacts are likely to be less than a normal construction programme, and they would have to be undertaken in consultation with the residents in ay event as the works are in their homes. Therefore, the impact would be temporary, and minimised. On the other hand, the benefit of the finished works to those residents with protected characteristics like those mentioned above would also likely be more keenly felt, with a more easily manageable home environment and lesser need for ongoing or urgent maintenance and disruption.

11.6 Given the above, the proposal is not considered to result in undue harm to the neighbouring amenity in compliance with policies A1 and A4 of the Local Plan.

12. APPLICANT CONSULTATION

12.1 In terms of engagement with the residents of the estate in relation to the proposed works the following has been carried out:

- In person meetings have been held with local residents (including the TRA) since 2019
- Consultation boards displayed in 2020
- Works to install the HIUs and associated pipework were undertaken in 2 uninhabited flats at nos. 26A and 46A Rowley Way (referred to as the pilot flats) in January 2022
- Question and answer word documents were prepared and distributed

12.2 It is clear from the number of objections received that there remains a vast difference of option between the applicant and the local residents about the proposed works particularly around the need to replace the existing heating system, the choice of replacement heating and the alternative options that have been put forward. The FAQ document, dated August 2022, gives clear concise advice about the proposals to residents, and is attached as appendix 1 to this report. The sets of planning applications have also been subject to separate consultation as outlined earlier in the report.

13. TRANSPORT

13.1 There are self-contained garages under the existing blocks that are either being rented or leased from the Council. A number of the garages are unused. It is proposed to use 2 bays of these garages / parking spaces of each block to install new water storage tanks.

13.2 The reduction in the number of basement car parking spaces is welcomed and would be in line with Camden Local Plan policy T2 and promoting a move away from a car-dependent society.

14. OTHER ISSUES

Costs

14.1 Local residents are concerned about the budgetary implications of such an extensive scheme and what this will mean financially for leaseholders. Leaseholders will contribute towards a proportion of the works. The details of leaseholders contributions and how they are calculated will be discussed as part of the formal consultation with leaseholders before works start.

14.2 The existing heating operates from October to April and runs continuously throughout this period. It is understood that this is the original design intent for the estate as a social housing scheme. Due to the failings of the current heating system some of the flats in the estate experience internal room temperatures of over 30 degrees which results in higher heating costs. Under the current charging system single occupants are charged the same as larger households. Residents are concerned that the proposed installation of the HIU's will mean they will have to pay more to keep their flats warm during the winter months and have raised issues associated with fuel poverty. Residents will have to pay for gas that they use however they will have the ability to regulate their own heating.

Maintenance

14.3 Concerns have been raised by local residents about issues associated with the planning and emergency maintenance of both the current and new systems.

14.4 Residents are also concerned about the problems that have been faced by residents at the Whittington Estate (Highgate New Town) who faced ongoing issues with a replacement heating system which also uses HIU's. The freeholder of the Whittington Estate is Camden Council. The Capital Works team advised that the problems highlighted with the operation of the HIU's were mainly due to the poor quality of the heating system water. This led to debris blocking the internal filters resulting in poor hot water performance and noise. The Council's Capital Works Team cleaned and treated the heating system water and recommissioned many of the HIU's. The lessons that have been learnt from the Whittington Estate is that HIU's require regular servicing to prolong their lifespan and to ensure efficient operation in terms of energy use and fewer breakdowns. An annual servicing programme has been introduced for all homes with HIU's as part of the lessons learnt from the Whittington Estate. There are a number of other Council-owned estates where HIU's have been installed which are operating as intended. These

include Harben Road, Waxham & Ludham, St Silas, Ampthill Estate and Monica Shaw Court.

Damp and mould

14.5 A significant concern of local residents has been about the potential for condensation and mould to develop with a new heating system. The current system of heating provides a continuous background level of heating which minimises any issues with damp and mould. The homes are not currently reported to suffer from rising damp or mould from condensation forming on internal surfaces. The lack of condensation on the poorly insulated surfaces is thought to be a combination of influences – excess heating and ventilation through draughts and windows needing to be opened during the winter, which results in extreme energy inefficiency. The homes are constantly heated between October to April (with the heated coil walls performing at 37-40 degrees. The local residents are concerned that intermittent heating will encourage condensation within the flats.

14.6 The heritage status of the buildings restricts the options for insulating the building fabric and reducing thermal bridging which can be problematic for moisture and condensation formation. Internal insulation of the flats was considered by the applicant but was discounted due to the impact on the spatial quality of the rooms but also the risk of exacerbating moisture and mould forming on any adjacent uninsulated surfaces. As detailed in the Heritage Section above external and internal insulation have been considered but have been discounted at this stage due to the harm to the heritage features of the listed buildings.

14.7 It is acknowledged that it will be important to retain good background ventilation to keep internal moisture levels low, especially when occupied. Alterations to the home heating would be balanced with improved ventilation to kitchens and bathrooms. Some but not all windows have trickle ventilation at the heads of windows. Proposal to improve ventilation include the review and replacement of old extract fans in kitchens and bathrooms with new efficient extract units with better controls, including humidistats. Existing fresh air inlets will be refurbished.

Development type

Concerns have been raised by local residents about the fact that the application details online identify the development type as residential minor alterations. Although the applications affect the entire estate of 520 dwellings, the proposed development type is not a reflection of the impact of the development but relates to floorspace uplift.

15. BIODIVERSITY NET GAIN

15.1 The proposals do not impact any trees, greening or biodiversity, so there are no important considerations to these matters in terms of the development plan. As well as the requirements of the development plan, there are statutory requirements for 10% Biodiversity Net Gain (BNG).

15.2 BNG is a way of creating and improving natural habitats with a measurably positive impact ('net gain') on biodiversity, compared to what was there before development. Every grant of planning permission is deemed to have been granted subject to a condition which requires the submission of a Biodiversity Net Gain Plan (BGP) before development can commence, showing how the 10% gain will be met.

15.3 This gain can be achieved through onsite biodiversity gains, registered offsite biodiversity gains (for example, on other land or developments owned by the applicant), or by purchasing statutory biodiversity credits.

15.4 There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information provided, this scheme will not require the approval of a BGP because the application was made before 12 February 2024, and in any event, it would also be below the de minimis threshold.

16. PLANNING OBLIGATIONS

16.1 The following heads of terms would be required to ensure that the scheme is implemented in its entirety to preserve the special interest of the Grade II* listed buildings.

- Delivery of the scheme in its entirety
- Suitably qualified and experienced architect
- The works approved as part of these applications are linked to planning application ref 2023/5338/P and listed building consent 2024/0091/L and shall be implemented together

17. CONCLUSION

17.1 The existing heating infrastructure is considered outdated and inefficient and there are significant concerns that the system will eventually fail to provide heating and hot water to the residents of the estate. The proposed works will upgrade the heating infrastructure that serves the Alexandra Road Estate which are deemed necessary to continue to provide essential heating and hot water to residents. The retention of the communal gas boilers is accepted given the age of the boilers and their projected lifespan. Alternative heating options have been considered and the system has been future proofed to allow connections to more sustainable heating options like air

source heat pumps which provides a path towards decarbonisation of the network.

17.2 The Heritage section identifies heritage assets on the site. The proposed works would cause less than substantial harm to the designated heritage assets from a low level of harm to the Alexandra Road Estate to no harm to the Alexandra Road Conservation Area and surrounding assets.

17.3 When considering the impact of a proposed development on the significant of a designated heritage asset, great weight should be given to the asset's conservation and clear and convincing justification for the harm is required. The applicant has sought to avoid and mitigate harm as far as possible. However, less than substantial harm has been identified and considerable weight and importance must be given to that harm. There are public benefits that outweigh that harm, and as such the proposal remains in accordance with the development plan as a whole. The public benefits of the scheme include:

- Future proofing of the new heating system to provide a path towards decarbonisation of the estate's energy use in support of the Government's and Council's commitment to Net Zero and reduction of the carbon emissions produced by the existing heating system
- Reduction of risk of heating and hot water system failure which could lead to no heating or hot water to local residents of the estate
- Prevention of continued unaffordable maintenance costs associated with the ageing heating and hot water system

17.4 As well as the public benefits the scheme would minimise its impact on properties within the estate in terms of loss of light, outlook and privacy and would not impact on the amenities of adjoining properties outside the estate.

17.5 It is acknowledged that the replacement heating system has received significant opposition from the local residents. This relates to a wide range of issues and concerns from the principles behind the need for the replacement of the existing heating and hot water system, the options of alternative more energy efficient heating solutions, the financial costs, the running and maintenance of the new system, the continued use of gas boilers, the lack of use of new gas boilers, too much intervention in the fabric of the listed buildings, a lack of additional intervention in the listed buildings (no external wall insulation for example), damp and mould issues, as well as disruption as a result of the works. Taking account of the policies of development plan and all the material planning considerations the proposals would deliver environmental benefits that outweigh the less than substantial harm to heritage assets and it is therefore recommended that planning permission and listed building consent be granted.

18. RECOMMENDATION

18.1 Grant conditional planning permission subject to a Shadow Section 106 Legal Agreement with the following heads of terms:

- Delivery of the scheme in its entirety
- The works approved as part of these applications are linked to planning application ref 2023/5339/P and listed building consent 2024/00286/L and shall be implemented together

18.2 Grant conditional listed building consent.

19. LEGAL COMMENTS

19.1 Members are referred to the note from the Legal Division at the start of the Agenda.

20. CONDITIONS [PLANNING APPLICATION]

1	**Three years from the date of this permission** The development hereby permitted must be begun not later than the end of three years from the date of this permission . Reason: In order to comply with the provisions of Section 91 of the Town and Country Planning Act 1990 (as amended).
2	**Approved drawings** The development hereby permitted shall be carried out in accordance with the following approved plans: Existing drawings: Site location plan; 3467_LB_004000 rev P3; 3467_LB_003000 rev P3; 3467_LB_003002 rev P3; 3467_LB_003010 rev P3; 3467_LB_003011 rev P3; 3467_LB_003012 rev P3; 3467_LB_003013 rev P3; 3467_LB_003014 rev P3; 3467_LB_003015 rev P3; 3467_LB_003016 rev P3; 3467_LB_003017 rev P3; 3467_LB_003018 rev P3; 3467_LB_003019 rev P3; 3467_LB_004012 rev P3; 3467_LB_004013 rev P3; 3467_LB_004014 rev P3; 3467_LB_004020 rev P3; 3467_LB_004021 rev P3; 3467_LB_004031 rev P3; 3467_LB_004034 rev P3; 3467_LB_005020 rev P3. Proposed drawings: 3467_LB_110000 rev P3; 3467_LB_110002 rev P3; 3467_LB_11003 rev P3; 3467_LB_110004 rev P3; 3467_LB_110005 rev P2; 3467_LB_120000 rev P3; 3467_LB_120001 rev P2; 3467_LB_120002 rev P2; 3467_LB_120003 rev P2; 3467_LB_120005 rev P3; 3467_LB_120006 rev P3; 3467_LB_120007 rev P3; 3467_LB_120008 rev P2; 3467_LB_120010 rev P3; 3467_LB_120011 rev P3; 3467_LB_120012 rev P3; 3467_LB_120013 rev P3; 3467_LB_120015 rev P2; 3467_LB_120020 rev P2; 3467_LB_120021 rev P2; 3467_LB_120022 rev P2; 3467_LB_120023 rev P3; 3467_LB_120024 rev P2; 3467_LB_120025 rev P2; 3467_LB_120026 rev P2; 3467_LB_120027 rev P2; 3467_LB_120030 rev P2; 3467_LB_120031 rev P2; 3467_LB_120032 rev P3; 3467_LB_120033 rev P3; 3467_LB_120040 rev P2; 3467_LB_130000 rev P2; 3467_LB_130001 rev P2; 3467_LB_130010 rev P3; 3467_LB_130011 rev P3; 3467_LB_130012 rev P3; 3467_LB_130013 rev P3; 3467_LB_130014 rev P3; 3467_LB_130015 rev P3; 3467_LB_130016 rev P3; 3467_LB_130020 rev P2; 3467_LB_130021 rev P2; 3467_LB_130022 rev P3; 3467_LB_130023 rev P3; 3467_LB_130030 rev P2; 3467_LB_130031 rev P2; 3467_LB_130032 rev P2; 3467_LB_130033 rev P2; 3467_LB_140005 rev P2; 3467_LB_140006 rev P3; 3467_LB_140007 rev P3; 3467_LB_140010 rev P3; 3467_LB_140011 rev P2; 3467_LB_140020 rev P2; 3467_LB_331000 rev P3; 3467_LB_331001 rev P2; 3467_LB_331002 rev P2; 3467_LB_331003 rev P2; 3467_LB_331004 rev P2; 3467_LB_331005 rev P2; 3467_LB_331006 rev P2.

	3547-RW-M-020; 3547-RW-M-502; 3547-RW-M-503; 3547-RW-M-505; 3547-RW-M-506; 3547-RW-M-507; 3547-RW-M-519; 3547-RW-M-534; 3547-RW-M-541; 3547-RW-M-560; 3547-RW-M-561; 3547-RW-M-562; 3547-RW-M-563; 3547-RW-M-601; 3547-RW-M-602; 3547-RW-M-605. Documents: Acoustic Consultancy Report prepared by LCP dated 07/08/2024; Alexandra Road Estate Heating Infrastructure Technical Report prepared Levitt Bernstein dated February 2020; Design and Access Statement prepared by Levitt Bernstein dated November 2023; Brochure extract by Unistrut (P3300T10); Brochure extract by Unistrut (M8_M10 Standard R); Strut details prepared by Big Foot Support; LD Support Frame and Support Foot data sheet produced by Roof Runner. Reason: For the avoidance of doubt and in the interest of proper planning.
3	**Materials to match** All new external work shall be carried out in materials that resemble, as closely as possible, in colour and texture those of the existing building, unless otherwise specified in the approved application. Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.
4	**Detailed drawings** Before the relevant part of the work is begun, detailed drawings, or samples of materials as appropriate, in respect of the following, shall be submitted to and approved in writing by the local planning authority: a) the design of boiler and plant enclosures including detailed drawings showing typical details of junctions with historic fabric, facing materials, colours and finishes, profile details and methods of fixing b) full details of all typical external pipework design and service routes, showing how pipework will be fixed to historic fabric and how it will penetrate the existing building envelope The relevant part of the works shall be carried out in accordance with the details thus approved and all approved samples shall be retained on site during the course of the works. Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.
5	**Noise** The external noise level emitted from plant, machinery or equipment at the development with specified noise mitigation hereby approved shall be lower than the typical existing background noise level by at least 10dBA, by 15dBA

	where the source is tonal, as assessed according to BS4142:2014 at the nearest and/or most affected noise sensitive premises, with machinery operating at maximum capacity and thereafter be permanently retained. Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policies A1 and A4 of the London Borough of Camden Local Plan 2017.
6	**Noise - Acoustic isolation** Before the use commences, the plant shall be provided with acoustic isolation, and anti-vibration measures in accordance with the scheme to be approved in writing by the local planning authority. All such measures shall thereafter be retained and maintained in accordance with the manufacturers' recommendations. Reason: To safeguard the amenities of the adjoining premises and the area generally in accordance with the requirements of policy A1 and A4 of the London Borough of Camden Local Plan 2017.
7	**Removal of redundant pipework** All redundant services pipework (including temporary pipework) from the plant room shall be removed as soon as reasonably practical once the new heating system is operating unless otherwise agreed in writing by the local planning authority. Reason: In order to minimise the impact on the appearance of the buildings and local environment in accordance with the requirements of policies D1 and D2 of the London Borough of Camden Local Plan 2017.
8	**Mock-up of service pipes** A mock-up of all proposed service pipes shall be constructed on a typical single concrete fin on the north elevation of Block A, Rowley Way showing how the proposed services will sit alongside existing service pipes and how pipework will branch off to access individual dwellings. Officers shall be notified in writing of the mock-up so that a site inspection can be made, and details shall be submitted to and approved in writing by the local planning authority in consultation with Historic England before the relevant part of the work is begun. The mock-up shall include full details of pipework profiles, materials, finishes and fixing methods. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved. Reason: To safeguard the appearance of the premises and the character of the immediate area in accordance with the requirements of policy D1 and D2 of the London Borough of Camden Local Plan 2017.

21. INFORMATIVES

1	This approval does not authorise the use of the public highway. Any requirement to use the public highway, such as for hoardings, temporary road closures and suspension of parking bays, will be subject to approval of relevant licence from the Council's Streetworks Authorisations & Compliance Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No 020 7974 4444). Licences and authorisations need to be sought in advance of proposed works. Where development is subject to a Construction Management Plan (through a requirement in a S106 agreement), no licence or authorisation will be granted until the Construction Management Plan is approved by the Council.
2	Your proposals may be subject to control under the Building Regulations and/or the London Buildings Acts that cover aspects including fire and emergency escape, access and facilities for people with disabilities and sound insulation between dwellings. You are advised to consult the Council's Building Control Service, Camden Town Hall, Judd St, Kings Cross, London NW1 2QS (tel: 020-7974 6941).
3	All works should be conducted in accordance with the Camden Minimum Requirements - a copy is available on the Council's website (search for 'Camden Minimum Requirements' at www.camden,gov.uk) or contact the Council's Noise and Licensing Enforcement Team, 5 Pancras Square c/o Town Hall, Judd Street London WC1H 9JE (Tel. No. 020 7974 4444) Noise from demolition and construction works is subject to control under the Control of Pollution Act 1974. You must carry out any building works that can be heard at the boundary of the site only between 08.00 and 18.00 hours Monday to Friday and 08.00 to 13.00 on Saturday and not at all on Sundays and Public Holidays. You must secure the approval of the Council's Noise and Licensing Enforcement Team prior to undertaking such activities outside these hours.
4	Biodiversity Net Gain (BNG) Informative (1/2): The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 ("1990 Act") is that planning permission granted in England is subject to the condition ("the biodiversity gain condition") that development may not begin unless: (a) a Biodiversity Gain Plan has been submitted to the planning authority, and (b) the planning authority has approved the plan. The local planning authority (LPA) that would approve any Biodiversity Gain Plan (BGP) (if required) is London Borough of Camden.

	There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. These are summarised below. Based on the information available, this will not require the approval of a BGP before development is begun because the application was made before 12 February 2024. ++ Summary of statutory exemptions for biodiversity gain condition: 1. The planning application was made before 12 February 2024. 2. The planning permission is retrospective. 3. The planning permission was granted under section 73 of the Town and Country Planning Act 1990 and the original (parent) planning permission was made or granted before 12 February 2024. 4. The permission is exempt because: - It is not "major development" and the application was made or granted before 2 April 2024, or planning permission is granted under section 73 and the original (parent) permission was made or granted before 2 April 2024. - It is below the de minimis threshold (because it does not impact an onsite priority habitat AND impacts less than 25 square metres of onsite habitat with biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat). - The application is a Householder Application. - It is for development of a "Biodiversity Gain Site". - It is Self and Custom Build Development (for no more than 9 dwellings on a site no larger than 0.5 hectares and consists exclusively of dwellings which are Self-Build or Custom Housebuilding). - It forms part of, or is ancillary to, the high-speed railway transport network (High Speed 2).
5	Biodiversity Net Gain (BNG) Informative (2/2): + Irreplaceable habitat: If the onsite habitat includes Irreplaceable Habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements. In addition to information about minimising adverse impacts on the habitat, the BGP must include information on compensation for any impact on the biodiversity of the irreplaceable habitat. The LPA can only approve a BGP if satisfied that the impact on the irreplaceable habitat is minimised and appropriate arrangements have been made for compensating for any impact which do not include the use of biodiversity credits. ++ The effect of section 73(2D) of the Town and Country Planning Act 1990 If planning permission is granted under section 73, and a BGP was approved in relation to the previous planning permission ("the earlier BGP"), the earlier BGP may be regarded as approved for the purpose of discharging the biodiversity gain condition on this permission. It will be regarded as

	approved if the conditions attached (and so the permission granted) do not affect the post-development value of the onsite habitat, or any arrangements made to compensate irreplaceable habitat, as specified in the earlier BGP. ++ Phased development 1.1 In the case of phased development, the BGP will be required to be submitted to and approved by the LPA before development can begin (the overall plan), and before each phase of development can begin (phase plans). The modifications in respect of the biodiversity gain condition in phased development are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024.
6	Conditions marked with ** The matters covered by conditions marked with an ** are matters which would usually be incorporated into a Section 106 Agreement. On Council own schemes because the Council cannot enter into an agreement with itself the usual practice would for the permission to reference the Section 106 requirements for information. If the Council retains ownership of the application site although the reference to Section 106 requirements would not be legally binding they would act as a record of the requirements the Council as planning authority expects the Council as landowner to comply with. If the Council disposes of a relevant interest in the Application Site (which for the avoidance of doubt will not include disposals to individual tenants and occupiers) the incoming owner will be required to enter into a Section 106 giving effect to those requirements which will then become a legally binding document.

22. CONDITIONS [LISTED BUILDING CONSENT]

1	**Three years from the date of this permission** The works hereby permitted shall be begun not later than the end of three years from the date of this consent. Reason: In order to comply with the provisions of Section 18 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
2	**Approved drawings** The development hereby permitted shall be carried out in accordance with the following approved plans: Existing drawings: Site location plan; 3467_LB_004000 rev P3; 3467_LB_003000 rev P3; 3467_LB_003002 rev P3; 3467_LB_003010 rev P3; 3467_LB_003011 rev P3; 3467_LB_003012 rev P3; 3467_LB_003013 rev P3; 3467_LB_003014

	rev P3; 3467_LB_003015 rev P3; 3467_LB_003016 rev P3; 3467_LB_003017 rev P3; 3467_LB_003018 rev P3; 3467_LB_003019 rev P3; 3467_LB_004012 rev P3; 3467_LB_004013 rev P3; 3467_LB_004014 rev P3; 3467_LB_004020 rev P3; 3467_LB_004021 rev P3; 3467_LB_004031 rev P3; 3467_LB_004034 rev P3; 3467_LB_005020 rev P3. Proposed drawings: 3467_LB_110000 rev P3; 3467_LB_110002 rev P3; 3467_LB_11003 rev P3; 3467_LB_110004 rev P3; 3467_LB_110005 rev P2; 3467_LB_120000 rev P3; 3467_LB_120001 rev P2; 3467_LB_120002 rev P2; 3467_LB_120003 rev P2; 3467_LB_120005 rev P3; 3467_LB_120006 rev P3; 3467_LB_120007 rev P3; 3467_LB_120008 rev P2; 3467_LB_120010 rev P3; 3467_LB_120011 rev P3; 3467_LB_120012 rev P3; 3467_LB_120013 rev P3; 3467_LB_120015 rev P2; 3467_LB_120020 rev P2; 3467_LB_120021 rev P2; 3467_LB_120022 rev P2; 3467_LB_120023 rev P3; 3467_LB_120024 rev P2; 3467_LB_120025 rev P2; 3467_LB_120026 rev P2; 3467_LB_120027 rev P2; 3467_LB_120030 rev P2; 3467_LB_120031 rev P2; 3467_LB_120032 rev P3; 3467_LB_120033 rev P3; 3467_LB_120040 rev P2; 3467_LB_130000 rev P2; 3467_LB_130001 rev P2; 3467_LB_130010 rev P3; 3467_LB_130011 rev P3; 3467_LB_130012 rev P3; 3467_LB_130013 rev P3; 3467_LB_130014 rev P3; 3467_LB_130015 rev P3; 3467_LB_130016 rev P3; 3467_LB_130020 rev P2; 3467_LB_130021 rev P2; 3467_LB_130022 rev P3; 3467_LB_130023 rev P3; 3467_LB_130030 rev P2; 3467_LB_130031 rev P2; 3467_LB_130032 rev P2; 3467_LB_130033 rev P2; 3467_LB_140005 rev P2; 3467_LB_140006 rev P3; 3467_LB_140007 rev P3; 3467_LB_140010 rev P3; 3467_LB_140011 rev P2; 3467_LB_140020 rev P2; 3467_LB_331000 rev P3; 3467_LB_331001 rev P2; 3467_LB_331002 rev P2; 3467_LB_331003 rev P2; 3467_LB_331004 rev P2; 3467_LB_331005 rev P2; 3467_LB_331006 rev P2. 3547-RW-M-020; 3547-RW-M-502; 3547-RW-M-503; 3547-RW-M-505; 3547-RW-M-506; 3547-RW-M-507; 3547-RW-M-519; 3547-RW-M-534; 3547-RW-M-541; 3547-RW-M-560; 3547-RW-M-561; 3547-RW-M-562; 3547-RW-M-563; 3547-RW-M-601; 3547-RW-M-602; 3547-RW-M-605. Documents: Heat Infrastructure Technical Report prepared by Levitt Bernstein dated February 2020; External Plant Assessment prepared by LCP dated 07/08/2024; Design and Access Statement prepared by Levitt Bernstein dated November 2023; Typical pipe fixing - Strut Channel Data Sheet produced by Unistrut; Heat Interface Unit SATK32 Data Sheet produced by Altecnic; LC Support Foot Data Sheet produced by Roof Runner; LC Support Frame Data Sheet produced by Roof Runner; Spilt Pipe Clamp Data Sheet produced by Unistrut; Typical Pipework Supports - Roof Pro Brochure produced by Roof Pro Rooftop Management Systems.

	Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.
3	**Materials to match** All new work and work of making good shall be carried out to match the existing adjacent work as closely as possible in materials and detailed execution. Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.
4	**Detailed drawings – boiler and plant enclosures** Before the relevant part of the works is begun fully annotated drawings of the boiler and plant enclosures showing typical details of junctions with historic fabric (plans, elevations and sections (scale 1:10) , facing materials, colours and finishes, profile details and methods of fixing (detailed plans, elevations and sections at scale 1:1 / 1:2) shall be submitted to and approved in writing by the local planning authority. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved. Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.
5	**Detailed drawings - pipework** Before the relevant part of the work is begun fully annotated drawings of all typical internal pipework design and service routes (plans, elevations and sections at 1:10), showing how pipework will be fixed to historic fabric and how it will penetrate the existing building envelope (detailed plans, elevations and sections at 1:1/1:2) shall be submitted to and approved in writing by the local authority. The relevant part of the works shall not be carried out otherwise than in accordance with the details thus approved. Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.
6	**Reuse of salvageable bricks** All salvageable bricks from the demolition of the existing plinth adjacent to the existing boiler house shall be stored on site for future re-use as part of landscaping works within the Alexandra Road Estate.

	Reason: In order to safeguard the special architectural and historic interest of the building in accordance with the requirements of policy D2 of the Camden Local Plan 2017.

23. INFORMATIVES [LISTED BUILDING CONSENT]

1	You are advised that any works of alterations or upgrading not included on the approved drawings which are required to satisfy Building Regulations or Fire Certification may require a further application for listed building consent
2	The applicant is advised that a listed building consent application would be required for the internal works covering the design and specification of heat emitters, including associated alterations to existing services and fixtures and fittings within the dwellings.

APPENDIX 1

A COPY OF FREQUENTLY ASKED QUESTIONS (FAQ) PREPARED FOR RESIDENTS BY CAMDEN COUNCIL DATED AUGUST 2022

Rowley Way Heating and Glazing Project FAQ

August 2022

What are the proposed changes?

- *Replacing the existing heating and hot water system, replacing window glass with extra-slim double glazing, and repairing or replacing window frames where needed.*
- *All pipework across the estate will be replaced, and heating & hot water installations inside each home will be upgraded with a new system will include new vertical flat-panel radiators to warm homes instead of the coils inside the walls. The radiators proposed are slim in design and will take up very little space.*
- *Residents will be able to choose when the heating in their home turns on and off all year round and will be able to set their own temperature in their own home.*
- *The new double glazing will fit into the existing frames and will significantly reduce the large amount of heat currently lost through the single glazed windows.*

What are the benefits for residents?

- *A more reliable heating and hot water system, with less interruptions to the service from leaks and other maintenance issues. There are many projects that have recently been delivered that have delivered similar benefits.*
- *Full control over the heating in your own home, including when the heating turns on and off, as well as what temperature it heats your home to.*
- *Unlimited and instant hot water available on demand, instead of a hot water tank which can run out and takes time to reheat.*
- *More comfortable energy efficient homes which need less energy to heat, helping to keep energy costs down. Where we have installed similar systems in other parts of Camden, energy use and costs have fallen.*
- *At the moment, the heating pipes in your house are connected directly to the pipes in your neighbours' homes. This means that if there is a leak or another problem in one home, we have to turn off the heating to lots of other homes too while we fix it. The new system will let us isolate the pipes in each home, so if we have to work on the heating inside one home, everyone else's heating keeps working.*

What are the benefits for the environment?

By putting full control of the heating in their homes into residents hands, the new system will provide multiple benefits for residents, for Camden, and for the environment:

- *The new system will use much less gas, so it will produce much less emissions. You will be able to use only the energy you need, and you will need less energy because of the new double glazing.*
- *The communal boilers are already efficient and when the new distribution system and controls are in place the whole system will be efficient. By maintaining the communal heating system in this way we can bring in a new communal energy source when the current boilers reach the end of their lives.*
- *A large number of homes have to use electric immersion heaters as the hot water supply to their home cannot be repaired. This new system will provide everyone with an efficient source of hot water.*
- *The new system will only use the gas it needs as it responds to the heating controls in each home, the current system operates at the same level regardless of how much heat people need.*
- *There will be fewer reactive repair call-outs to faults with the heating and hot water system and at present a full-time engineer is required at Rowley Way because the system is so unreliable*

Will the new setup be future proofed for a more energy efficient heat source?

Yes. The system is designed for us to switch it over to a newer, greener heat source when the existing boilers need replacing, we anticipate this will be in 10–15 years' time. This will not require any changes within your homes – just in the boiler house.

Will all homes have these works carried out?

Yes. We will need to work in every home on the estate because once we are finished the old system will be switched off. Residents must have the new system installed before this happens.

Are you going to insulate the walls too?

Normally we would add insulation to the walls of homes to help keep even more heat in, and there are two possible ways to insulate walls like these – by putting a layer of insulation on the outside of the walls, or by putting a layer of insulation on the inside of the walls.

Because the buildings at Rowley Way and Ainsworth Way are listed, we have to work with Heritage England and Camden's conservation team to check that any changes we make are respectful the historic character of the buildings.

We have had extensive conversations with conservation experts, and unfortunately there is no way that we can add insulation to the outside of the walls without affecting the historic appearance of the building. Because of this we would not be allowed to use external wall insulation. The other option (internal wall insulation) would mean adding a layer of insulation on the inside of walls, which would reduce the size of the rooms too much.

Can we choose either glazing or radiators or do we have to change both?

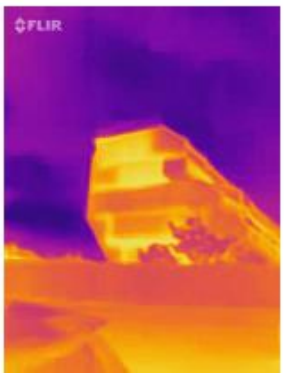
The new windows and the new radiators work together to warm your home and keep it warm. These two parts of the upgrade would not be able to work on their own.

If we didn't upgrade your windows, then you would need much bigger radiators (or more of them) to keep your home warm. If we just upgraded the windows, the problems with the old heating system would continue, you wouldn't be able to control your own heating, and the old system would start breaking down more and more often.

We carried out thermal imaging surveys to look at where heat is escaping from homes and the best way to stop it. These are the images from the thermal cameras:

Figure 4.1 - Block A - south stepped facade

Figure 4.2 - Rear of block A showing the heated party wall from the coils and the unheated wall.



At the moment, 30% of the heat which escapes from Rowley Way homes is lost through the windows. All this lost heat is costing residents money, and contributing to climate change, so it's really important that we get this sorted.

Why are you replacing coils with vertical flat panel radiators?

The heating coils are embedded in the walls between homes. We investigated whether or not it would be possible to connect new distribution pipework to the heating coils, but our investigations concluded that this is not practical, economical, feasible or energy efficient and would be far too disruptive for residents without any guarantee of a successful outcome given that the heating coils are more than 40 years old.

Some of the coils are still operating – can these remain if they are still working?

Many of the coils are still working for now, but the pipes supplying the coils frequently fail causing interruptions to the service. We do not want to connect new pipe work to coils that are over 40 years old because it is likely increasing numbers of coils will fail as time progresses. In addition, we want to leave residents with a system which they can control to suit their needs. This would not be possible if the coils are retained because they are shared between two flats. We would not recommend upgrading the distribution pipework and connecting to older infrastructure (the existing coils) that is starting to degrade.

Where will the radiators be installed and how many will be installed in each room?

Rowley Way homes have lots of varying and unique layouts, so the radiators will be installed in different places in different homes. We will carry out individual surveys of each home to work out the best place to install radiators, and the project team will discuss the potential locations with residents. You can see the sorts of locations where radiators might be installed in the show flats.

The number of radiators required for each space will be based on a heat-loss calculations assessment. This has been undertaken by our heating consultant and is based on the size of the rooms and position of the flat. It may need to be tweaked in some circumstances. Two pilot flats have been provided which residents have been able to view the look and feel of the potential finish. We are in the process of preparing a one bed flat which residents can also view later in the year.

What are "trench heaters"?

Trench heaters are like a cross between a radiator and underfloor heating. It is when a special type of radiator is installed underneath a grille in the floor. Trench heaters are a great way of heating a room evenly without taking up space on the wall. Residents in Rowley Way Block B and Ainsworth Way Block C will be able to ***choose*** *between a trench heater or a slimline vertical radiator. The trench heater is optional.*

A large number of Homes in Rowley Way Block A have a large concrete mantle under the patio doors. Digging this out to fit a trench heater would be very messy, very noisy, and would create a huge amount of dust inside the home. Because of this we will install a slimline vertical radiator instead, but we will discuss the location with you first.

The trench heaters only get as warm as a normal radiator, and it's fine for you to stand, or sit, or put things on top of the trench heater. It's best to put heat-sensitive items (like most houseplants) somewhere else though. And if you cover too much of the trench heater, it won't work as well – just like if you covered up a radiator.

How intrusive are the works? How long will they take?

The works will be intrusive because we will be removing the hot water cylinder and installing new pipework and installing radiators. We will also be installing new windows and repairing the frames where necessary.

We are working on ways to programme the works so as to minimise the disruption to residents. When we tender the works the contractors will provide us with an overview of how they will deliver the works and an estimate of how long they will take in each flat. Further engagement with residents will take place once we know more.

When will the works take place?

We will be on site early in 2023.

What does the Heat Interface Unit do?

The Heat Interface Unit (HIU) provides your heating and hot water in a similar way to a combi boiler, except it get its heat from the communal heating and hot water system. Unlike a hot water cylinder, the HIU provides hot water instantly, with no waiting, and it doesn't run out.

Residents can set the HIU to turn the heating on and off in their home at whatever times they choose – you will be able to have your heating off in winter, and on in summer if you like. The HIU will be connected to a wireless thermostat which will give you complete control over the temperature your house is heated to (NB: domestic thermostats generally go up to a maximum of 30°C - 35°C but this is the temperature your home is heated to, your hot water and radiators will be hotter than this).

We have carried out acoustic testing on the HIUs to ensure they are suitable for the bedroom installations. The HIUs will work on the incoming mains water pressure which will be comparable to the existing water pressures provided by the tanks on the roof.

In the event that the main plant room has to be shut down for repairs or maintenance then the HIUs will not provide heating or hot water. This type of shutdown is very rare though. Currently, most repairs (including heating or hot water repairs inside someone's home) mean turning off the heating and hot water to multiple homes nearby – with the new system, these repairs will be able to be done without interrupting anyone else's heating and hot water.

Will I have a heat meter? What are the benefits of having this?

Yes, heat meters will be included as part of the HIU. We want to enable everyone to reduce their carbon emissions, but it's really difficult to control your energy use when you don't even know how much you are using.

All the evidence shows us that when people are charged a flat rate for their energy regardless of how much they use, they often tend to waste more energy by doing things like leaving external doors and windows open while the heating is turned up (for example).

Individual heat metering shows you how much energy you are using, so you can make informed decisions about how much energy to use and what to use it for. It gives everyone an incentive not to waste energy, and contribute to climate change unnecessarily.

Most important of all heat meters help save money – more than 4 out 5 Camden tenants & leaseholders with a heat meter pay less for their heat than they would without it.

We have agreed with the heat meter billing team that we would switch over residents to heat metering block by block and would collect data from residents for a year before switching to this form of billing. This will ensure that we can address any potential anomalies e.g. where some residents bills look higher than they should be.

How does Heat Metered Billing work?

Camden will continue to provide your heat & hot water just like now, and Camden will still be your energy supplier. Camden buys its energy supplies in bulk, so we are able to get better prices, and we pass these savings on to our residents.

To start with, everyone will stay on the current scale charging for around a year while we build a profile of each household's heat use. Readings are automatically taken from heat meters and sent to Camden's servers and we use this time to check that all the readings are coming through correctly, and there are no anomalous readings.

Each year the household's heat use profile is assessed against the actual heat usage from the previous year and the charge will either go up or down (there are other factors too which can change the charge such as the cost of gas). This works a bit like the way electricity suppliers charge the same direct debit amount each month, and every now and then they compare how much you are using to how much you are paying, and adjust your direct debit accordingly.

The way you pay for your heat will not change, and there is no separate bill to pay. Tenants will continue to pay for their heat alongside their rent, and leaseholders will continue to pay for their heat alongside their service charges. The only difference is that the amount you pay will be based on how much you use.

If you are unable to pay, it will show as arrears on your overall account.

What will the approach to heat metering be for the end of terrace properties?

We are aware that some flat types are on end walls fully exposed to the outside and that the heat loss from some dwellings will be more than others. Although the options for insulation are very limited we will work with residents to look at what products may be applied to internal surfaces and what the cost benefit of these would be. Also, it should be noted that as the new distribution and controls will be much more efficient there will still be an appreciable reduction in the energy needed to heat these properties.

Where will the HIU and Heat Meter be installed?

We will remove the current hot water tank and install the HIU where the hot water tank was. This will be in different places in different homes. The heat meters will be inside the HIU, so there will not be a separate installation. The project team will confirm the location of the HIU with each resident before the works start.

Will the HIU be noisy?

We have tested two types of HIUs in the pilot flats. We have undertaken acoustic tests to reassure residents that the level of noise from the HIUs will not be disruptive. It should be noted that while the hot water is running the HIU will make a little noise as water flows through it.

Will I be able to control my own heating and hot water?

Yes. You will be able to set the heating to turn on and off at whatever times you choose. You will be able to set the overall temperature your home is heated up to, as well as setting different temperatures in different rooms by adjusting the radiators. Your hot water will be available all the time.

NB: domestic thermostats in Europe and the US can be set between around 10°C - 30°C (or 50°F - 90°F).

Will leaseholders be charged for the changes?

Leaseholders will contribute towards a proportion of works. We are asking the First-tier Tribunal Property Chamber (part of HM Courts & Tribunals Service) to advise us on which parts of the works leaseholders should contribute to. The details of leaseholders' contributions and how they are calculated will be discussed in detail as part of the formal consultation with leaseholders before works begin.

Can leaseholders commission and undertake the works within properties themselves?

It is Camden's responsibility to repair, maintain, renew the communal heating system therefore leaseholders would not be able to undertake the works inside their properties themselves.

What about repairing the new glazing and heating infrastructure? How do leaseholders and tenants go about fixing any issues?

Camden will continue to be responsible for all repairs to the heating system while leaseholders will remain responsible for replacing the glazing should the need arise.

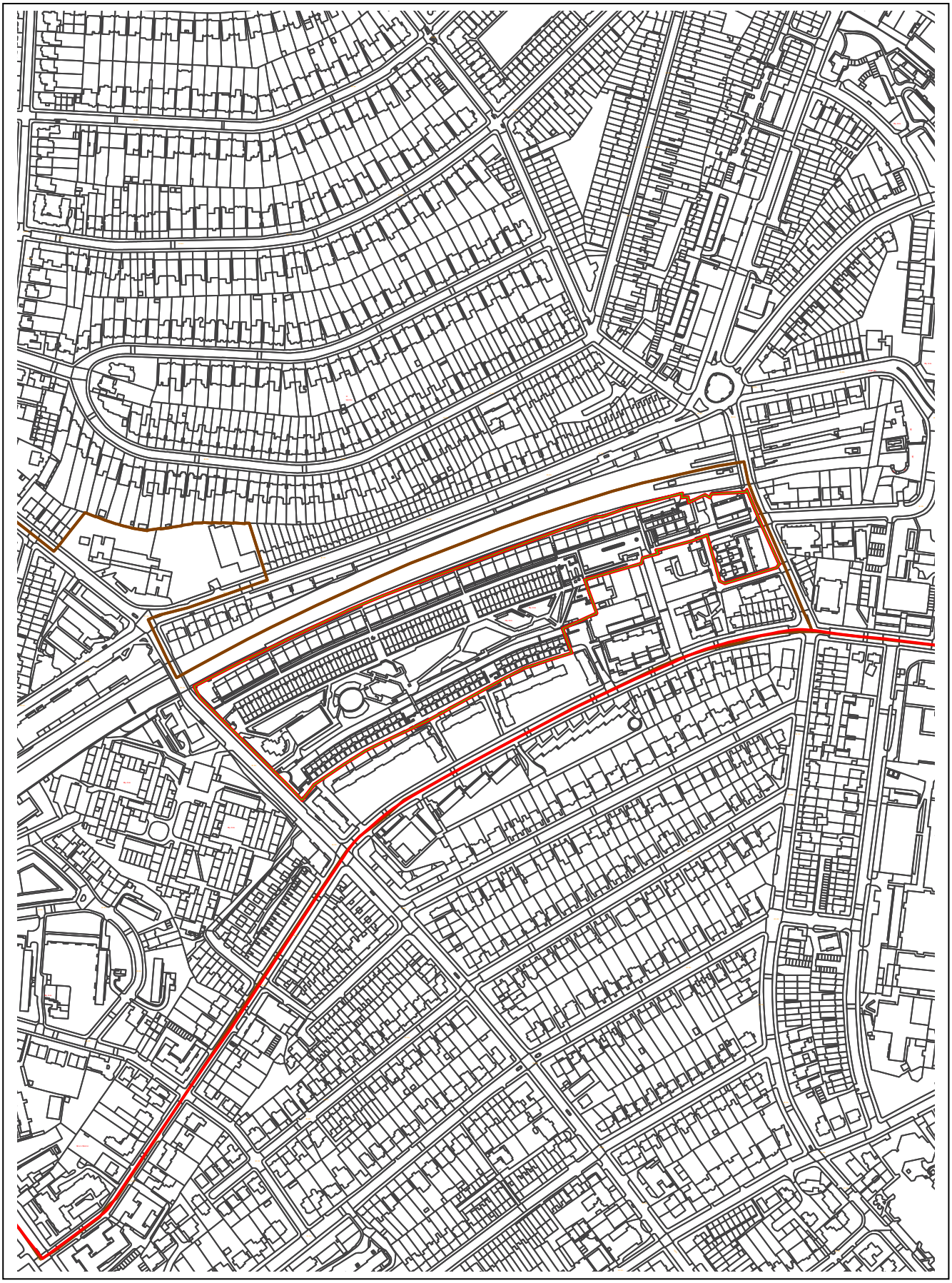
We are sourcing glass panes that can be ordered and installed within a short period of time. The show flats have used a product from China but we are in talks with other providers in Europe who can provide replacement parts within a shorter time period.

What will the proposed maintenance regime look like for the new system? Will there be any issues such as those experienced by other estates recently?

The project at Rowley Way will be designed by a specialist consultant, who will take into account the heritage requirements, and the scheme will be tailor made for the estate. Our specialist consultant will oversee the works from start to finish.

We have carried out similar upgrades and installed HIUs at a large number of locations and residents have found the new systems to be efficient and easy to use. In particular, the heat metering has enabled them to only pay for the energy they use.

We do have one location where there have been intermittent faults, this mostly due to filters getting clogged by debris in the system. These faults are being addressed.



Application No: 2023/5338/P and 2024/0091/L

Alexandra Road Estate, Rowley Way,
London,
NW8 0SN

Scale:
1:5000

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2-Dec-24

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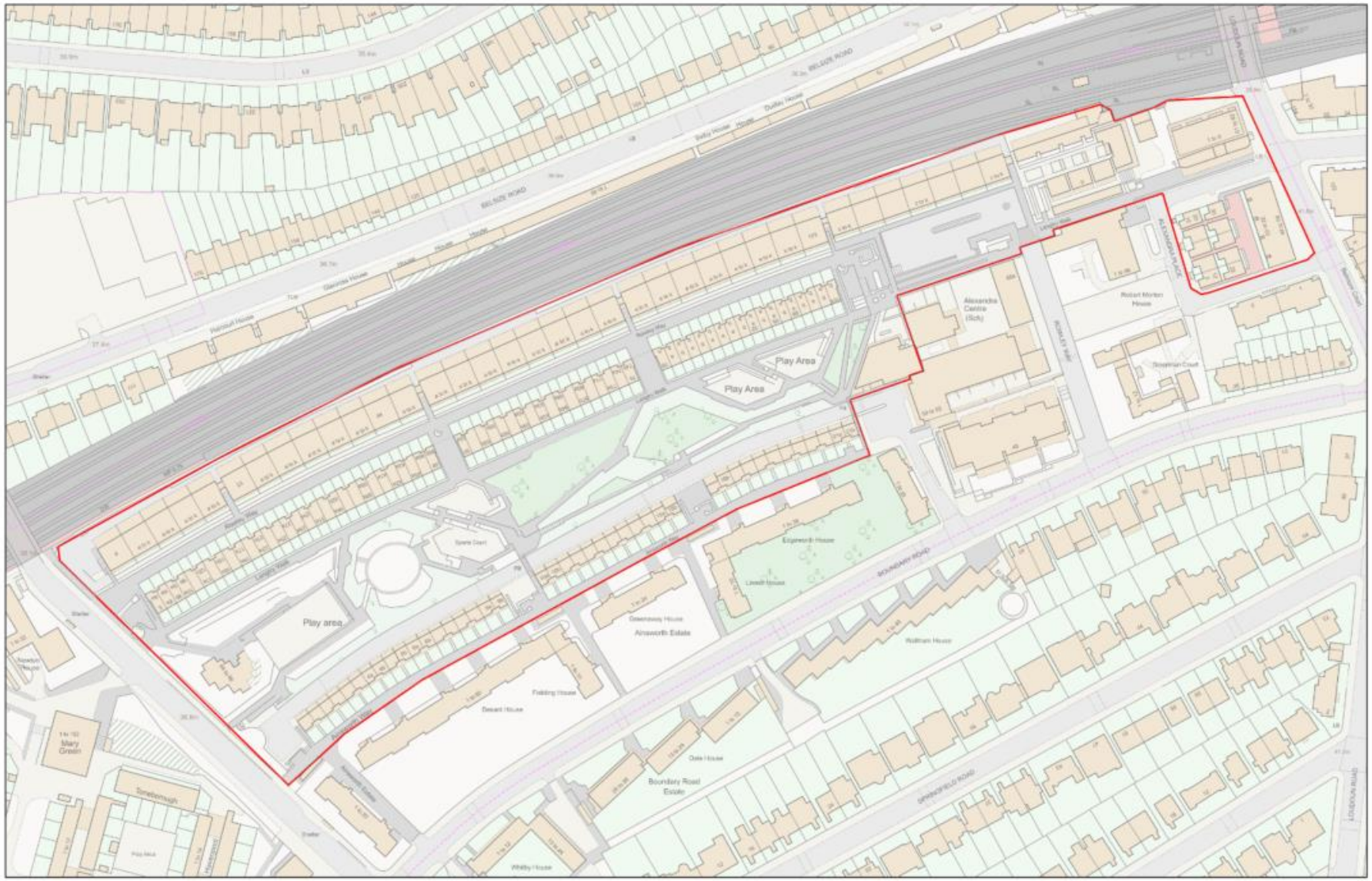
N
Play Area
Play Area
Play area
Boundary Road Estate
Ainsworth Estate
BOUNDARY ROAD
GRANFIELD ROAD
BELSIZE ROAD

Aerial view looking north


liot
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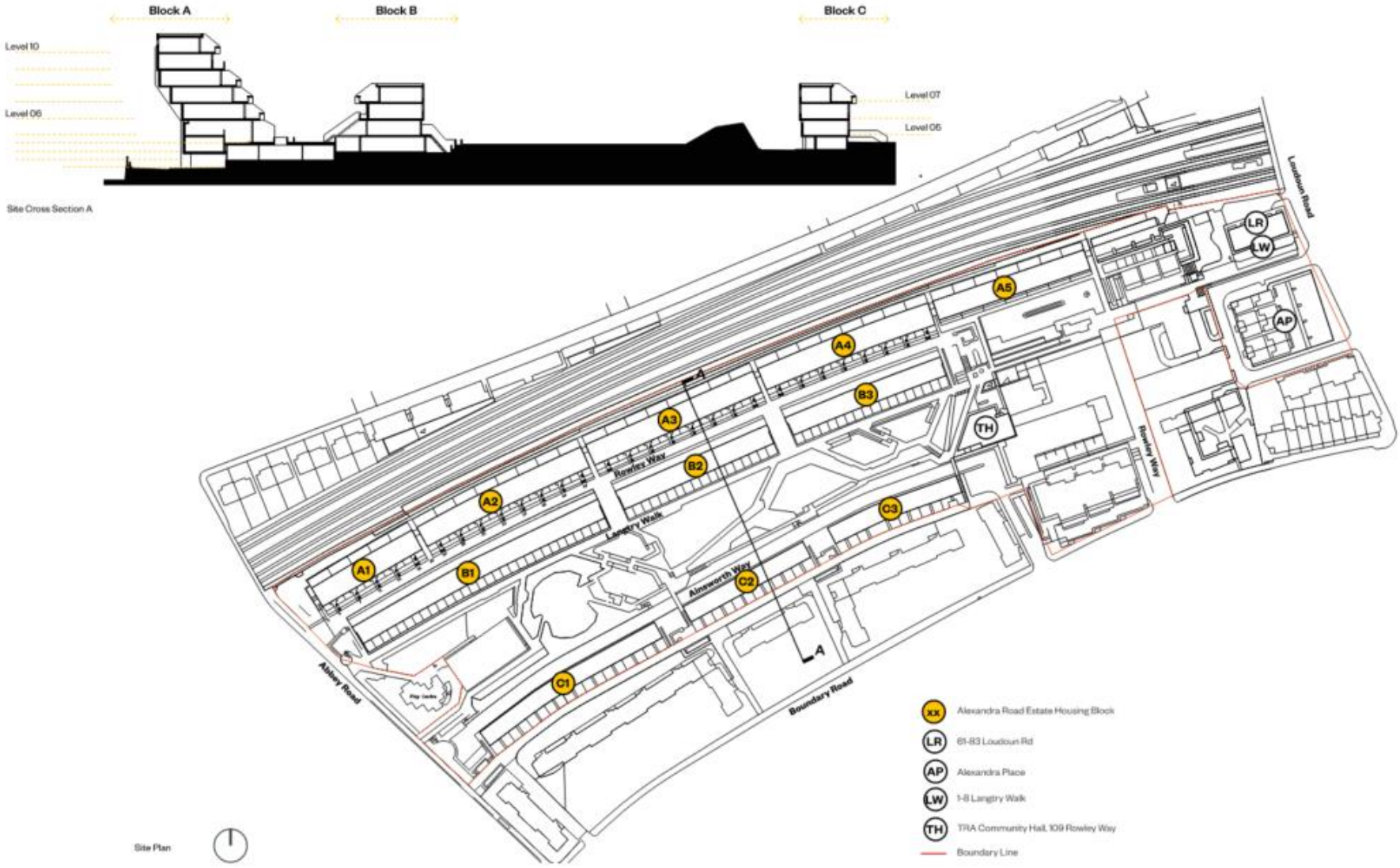
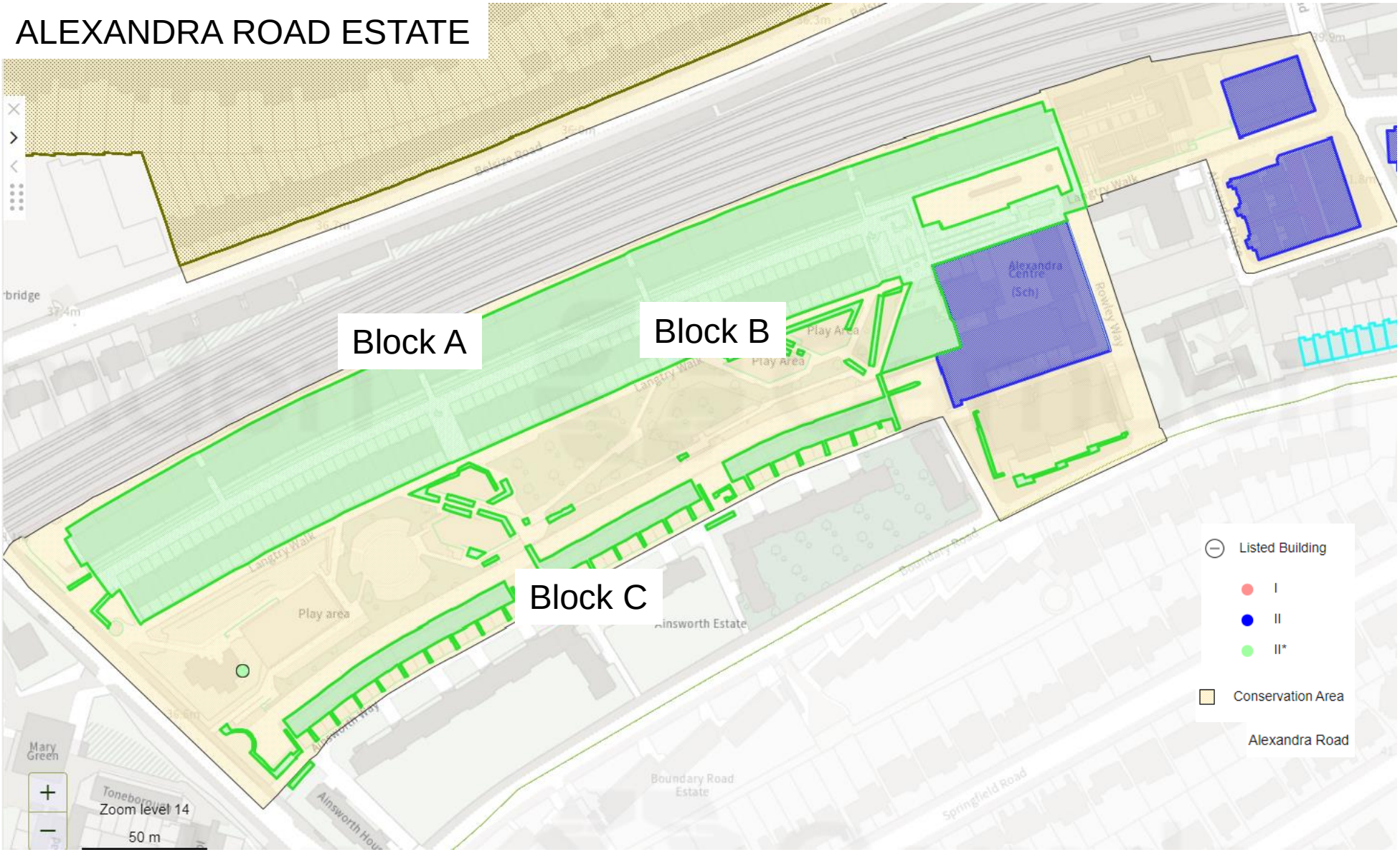
Academy
Layers
2D


Block A
Block B
Block C
Level 10
Level 06
Level 07
Level 05
Site Cross Section A
Loudoun Road
Rowley Way
Langtry Walk
Ainsworth Way
Abbey Road
Boundary Road
A1
A2
A3
A4
A5
B1
B2
B3
C1
C2
C3
LR
LW
AP
TH
Site Plan
Alexandra Road Estate Housing Block
61-83 Loudoun Rd
Alexandra Place
1-8 Langtry Walk
TRA Community Hall, 109 Rowley Way
Boundary Line

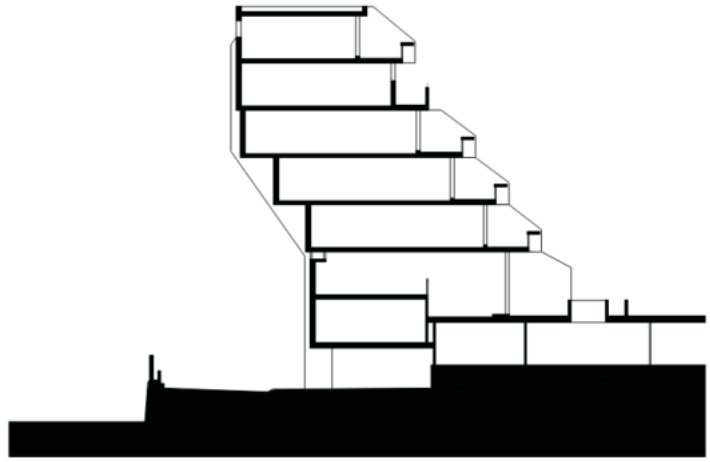
Aerial view of Blocks A and B

Aerial view of Block C

ALEXANDRA ROAD ESTATE



Block A north facade from Abbey road



Block A cross section looking east

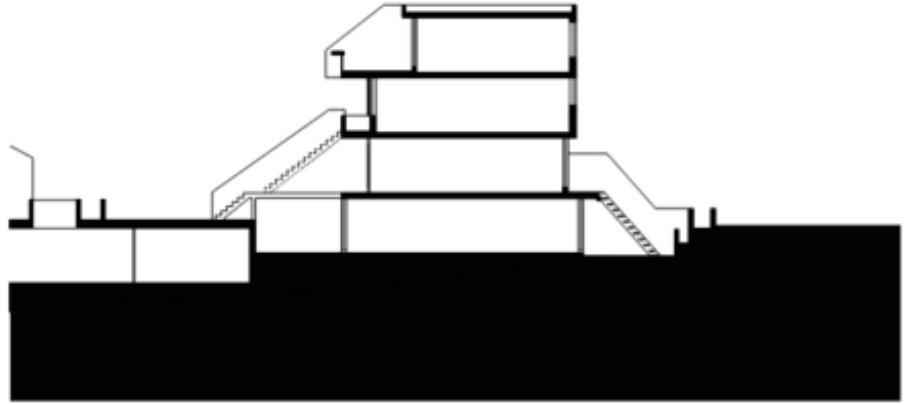
Block A looking west along service road to north

Block A south elevation

Block B North elevation, Rowley way, seen from Block A

View South-Wet to block B from Block A Staircase

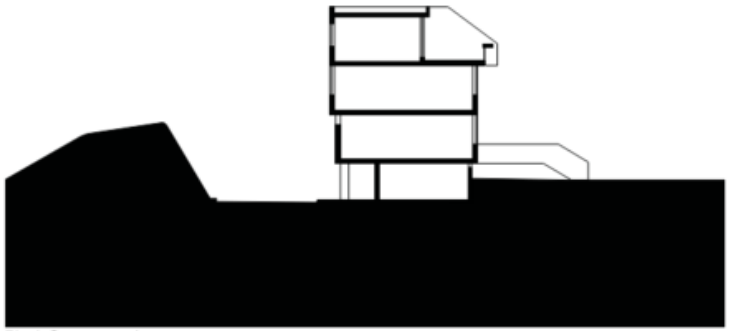
Block B South Elevation , seen from Langtry Walk



Block B cross section looking east

Block C, Ainsworth Way

Block C from Boundary road (South elevation)



Block C cross section

Eastern entrance from Loudoun road into Langtry walk. Conservation area boundary

1. 1-8 Langtry Walk block looking from west towards Loudoun Road

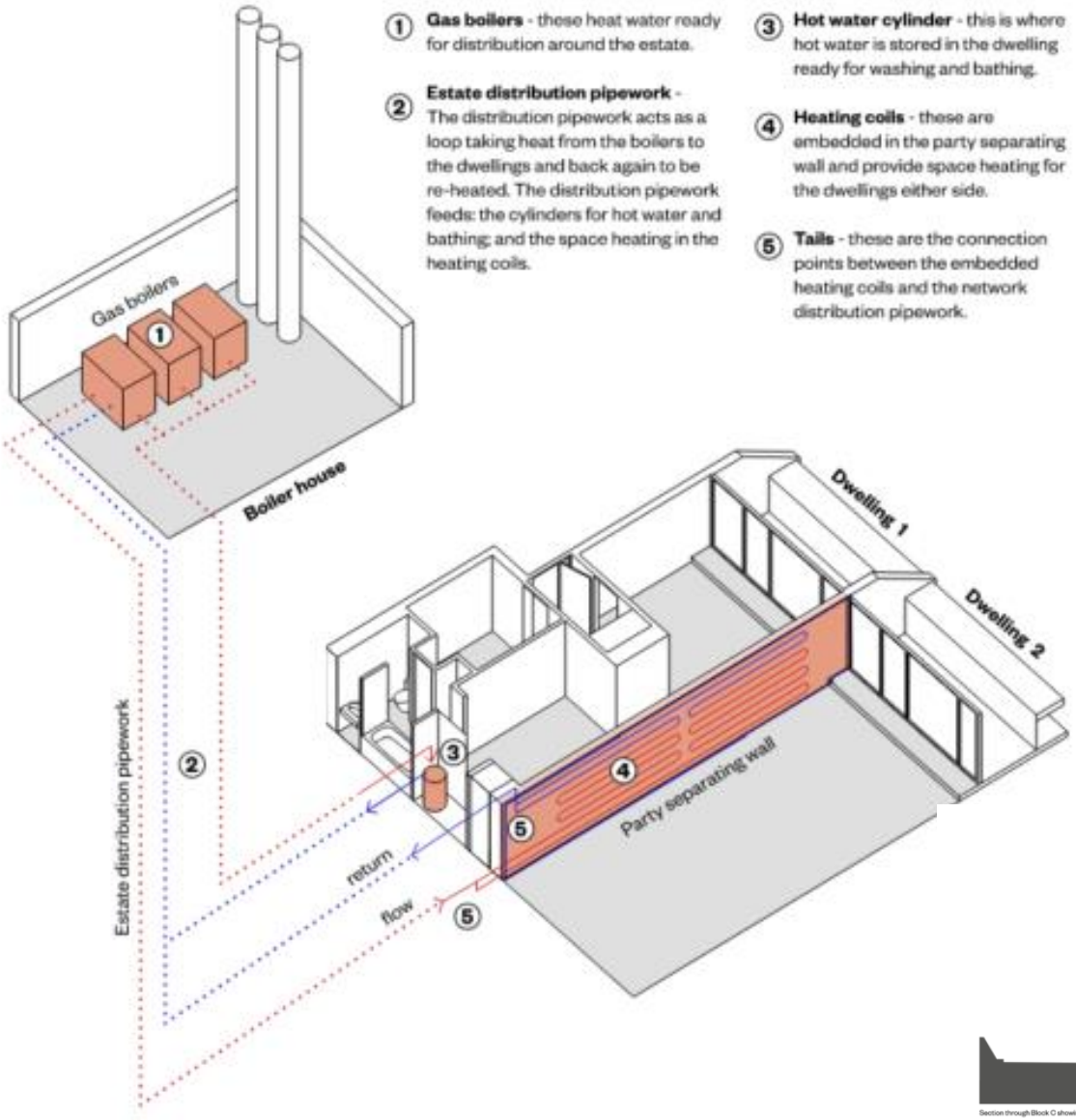
Site Plan

Key to site plan

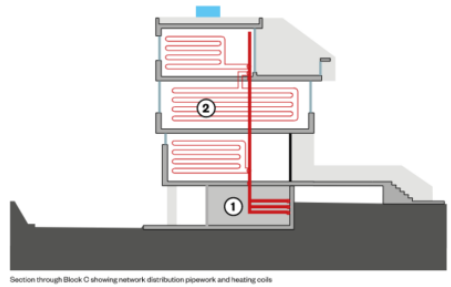
1 - 1-8 Langtry Walk
- 61-83 Loudoun Rd

2 - Alexandra Place

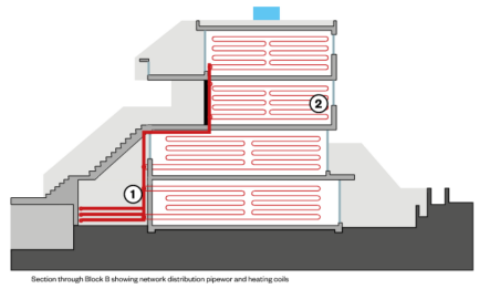
1. **Gas boilers** - these heat water ready for distribution around the estate.
2. **Estate distribution pipework** - The distribution pipework acts as a loop taking heat from the boilers to the dwellings and back again to be re-heated. The distribution pipework feeds: the cylinders for hot water and bathing; and the space heating in the heating coils.
3. **Hot water cylinder** - this is where hot water is stored in the dwelling ready for washing and bathing.
4. **Heating coils** - these are embedded in the party separating wall and provide space heating for the dwellings either side.
5. **Tails** - these are the connection points between the embedded heating coils and the network distribution pipework.



Block A

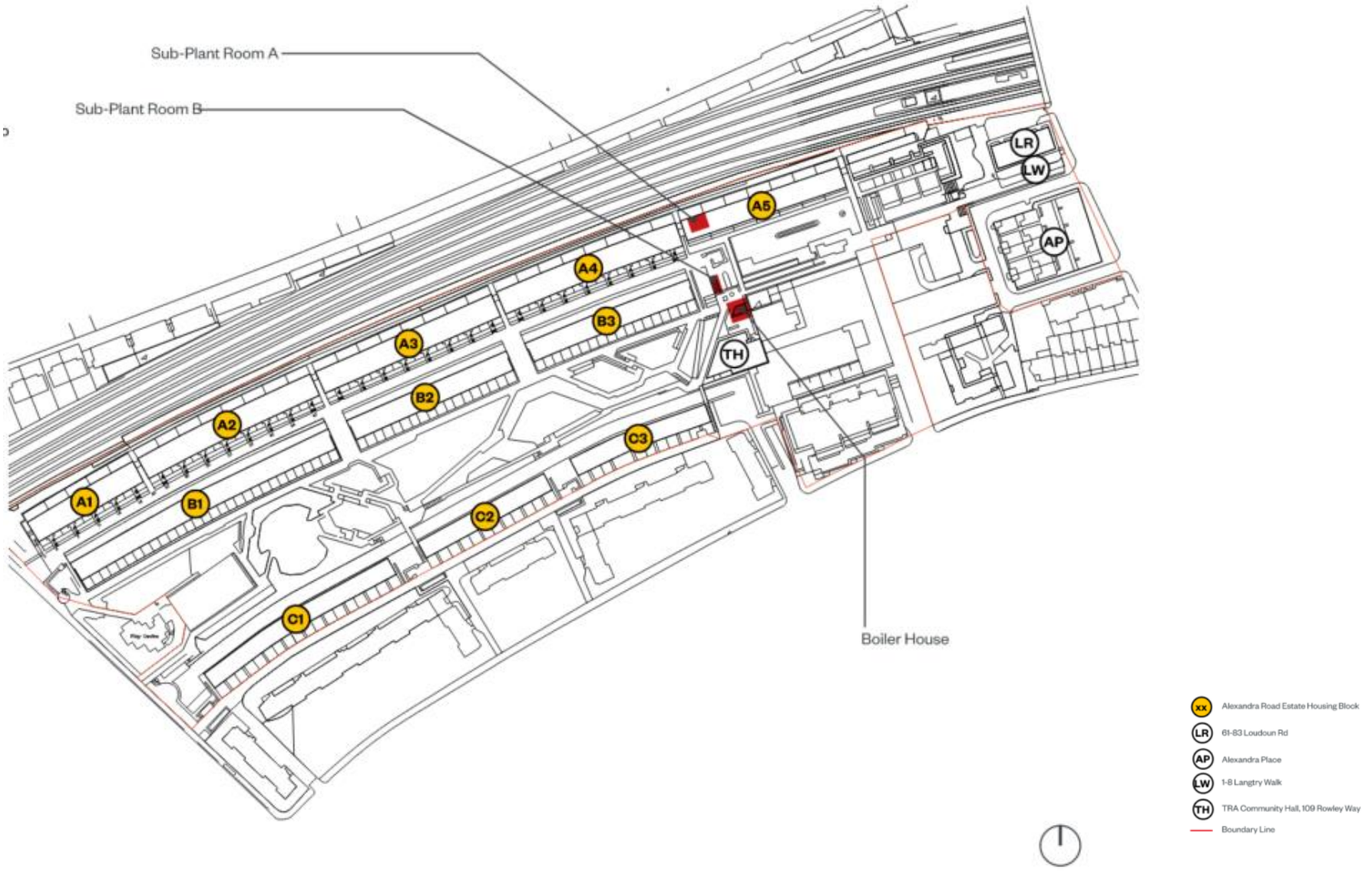


Block C



1. Estate distribution pipework
2. Heating coils

Block B

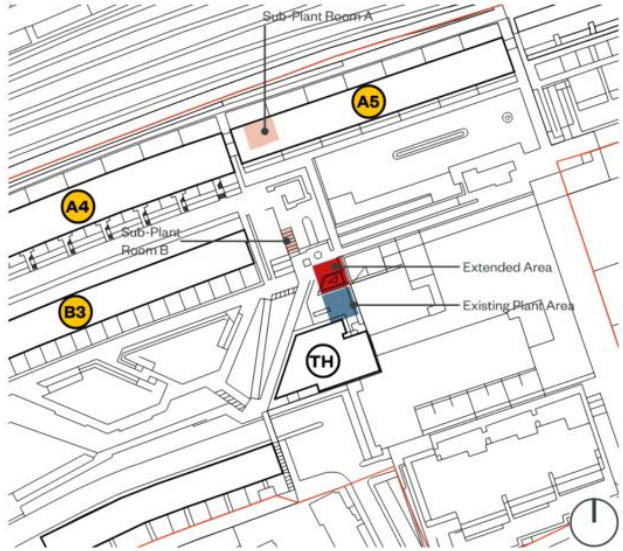


Proposed plant room locations

North of boiler room - Existing temporary timber hoarding on site

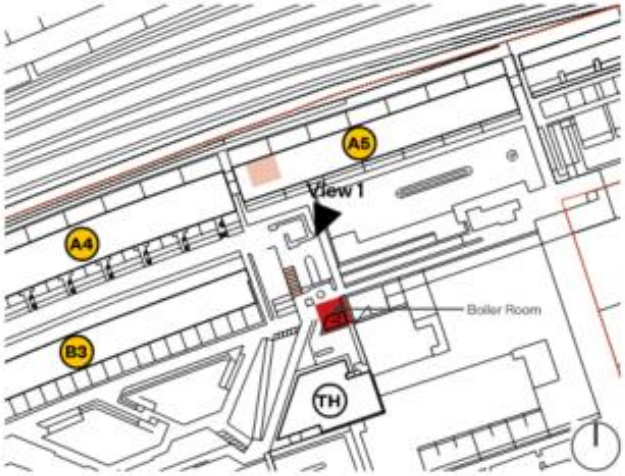
North west corner of boiler room - Existing temporary timber hoarding on site

Existing ductwork fixed to soffit of walkway, connecting boiler room to block A5



5.3 Boiler House- Proposed

View 1 - Visualisation of existing boiler house



View 1 - Visualisation of proposed boiler house enclosure

Schematic distribution heating plan

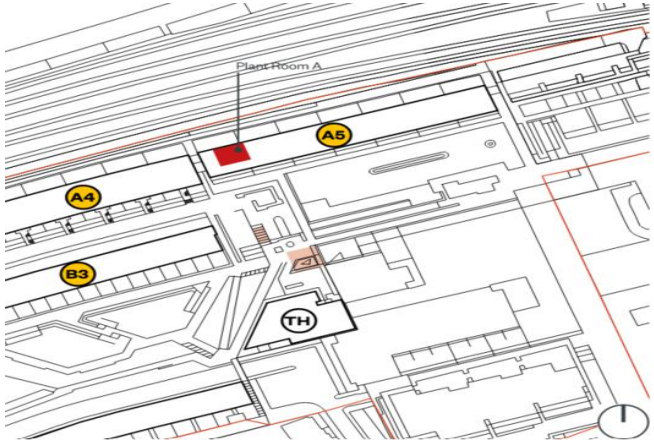
Schematic cold water pipe distribution plan

Schematic cold water pipe distribution plan

BLOCK A SUB-PLANT ROOM A

Existing Condition - Ground level North North Elevation

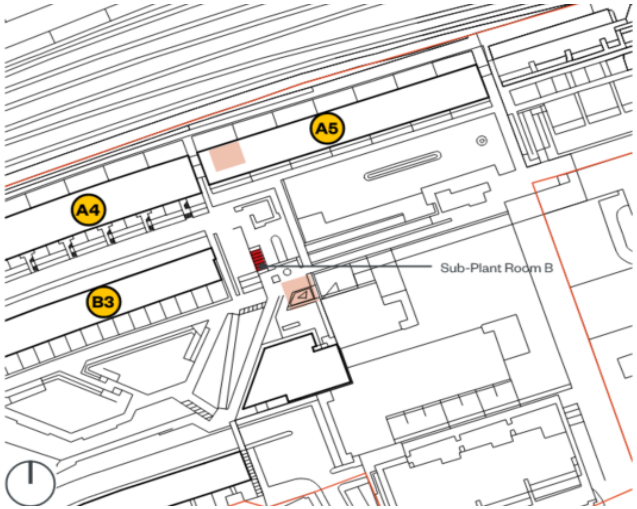
Proposed Plant enclosure to ground level North elevation



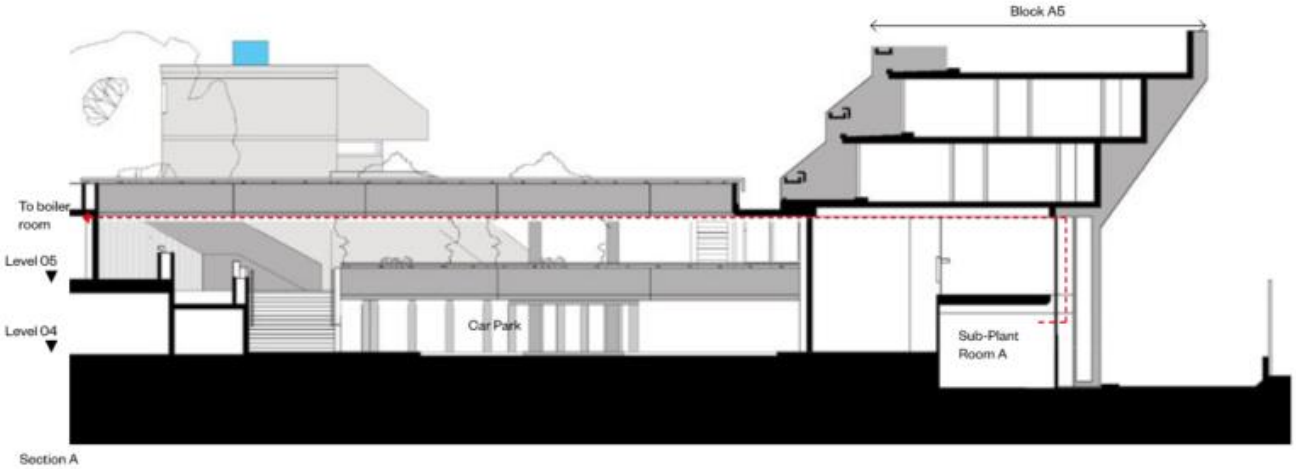
Existing (left) and proposed (right) sub plant room A under Block A5

SUB-PLANT ROOM B

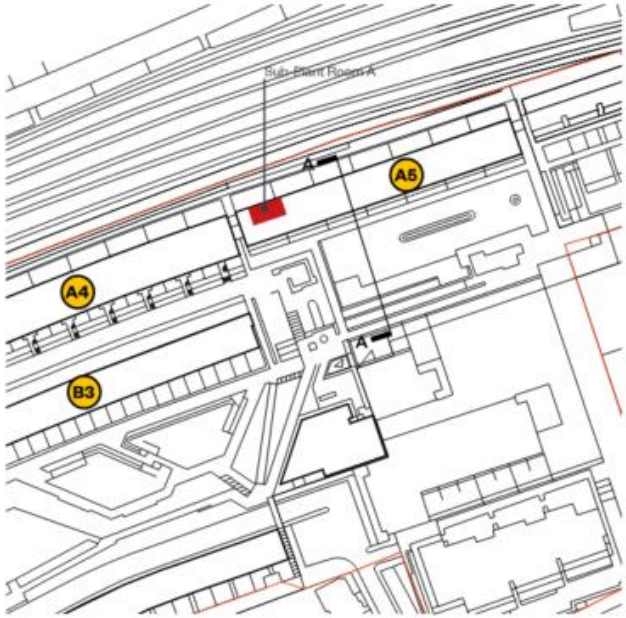
Existing view of void below stair



Existing (left) and proposed (right) sub-plant room B (void under external stair)



Section A



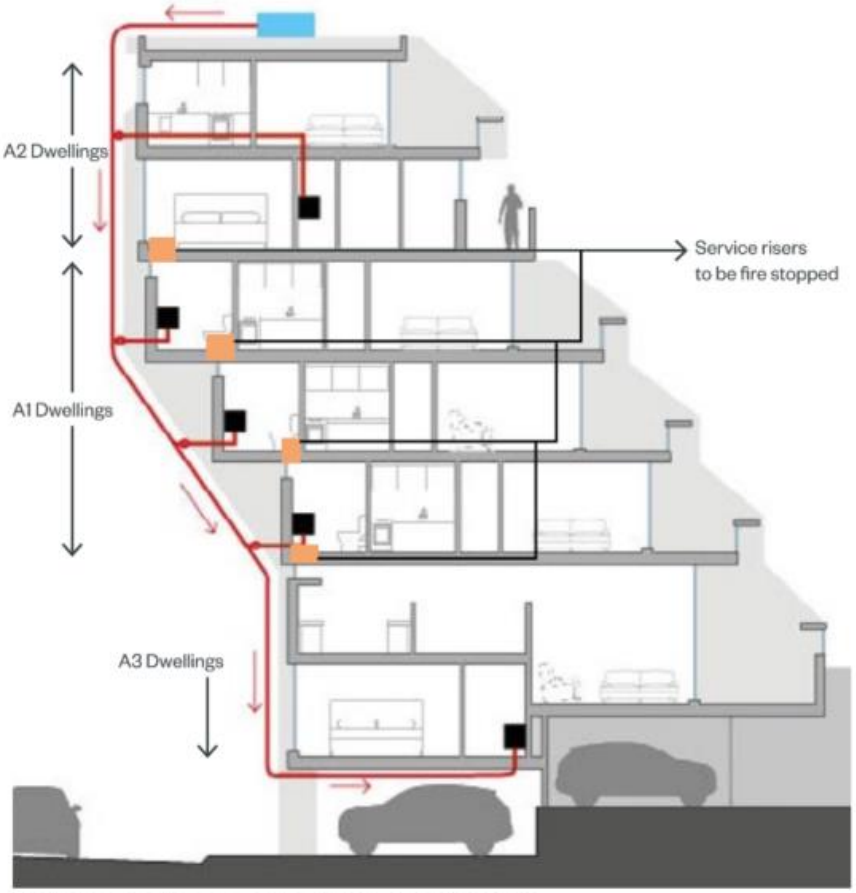
View from level 02 of car park entrance showing existing high level route to Block A. Casing to be replaced by smaller/higher pipework

Principle Routes – Block A

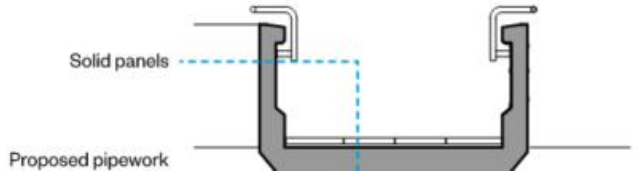
BLOCK A PIPEWORK

Heating distribution to A blocks

Existing condition of boxed section fixed to walkway soffit and penetration point to Housing Office fenestration

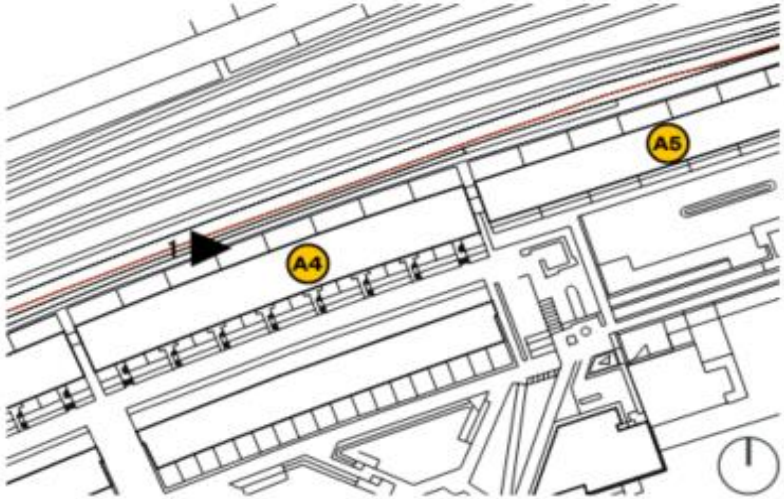


Block A cross section - proposed localised heating infrastructure



BLOCK A PIPEWORK - EXTERNAL

1. Proposed Block A ground condition - North Elevation



1. Existing Block A ground condation - North Elevation

Visual of proposed pipework on lower part of the northern elevation of Block A

BLOCK A PIPEWORK - EXTERNAL

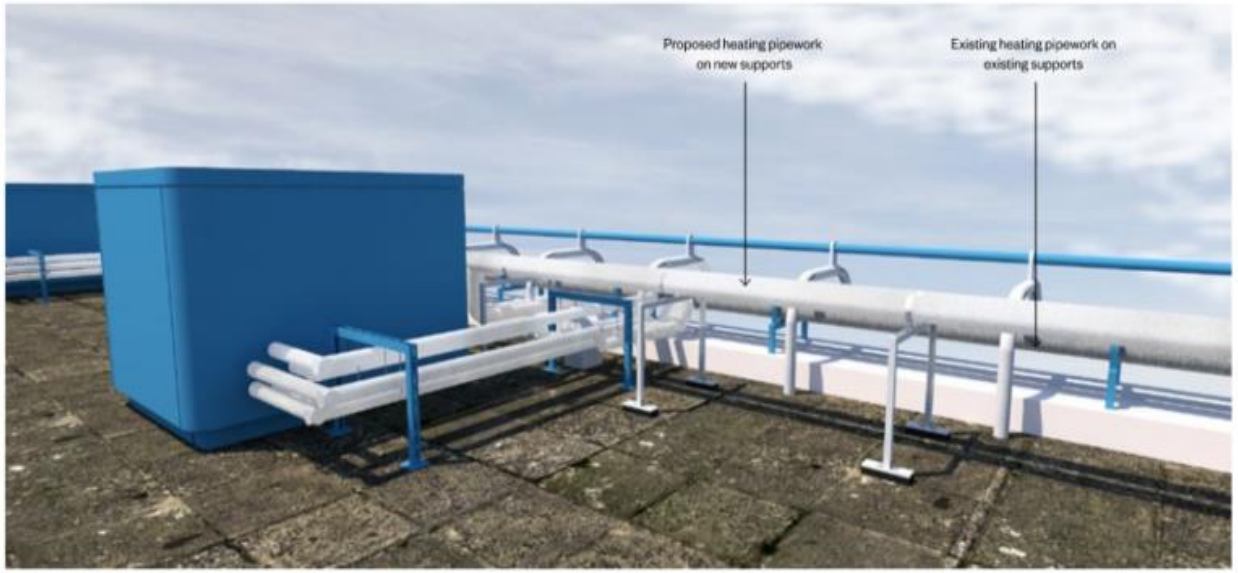


Image 1: Proposed heating pipework on Block A roof

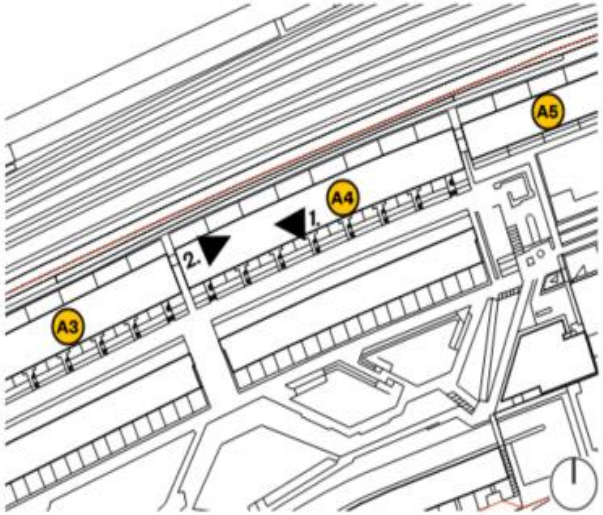
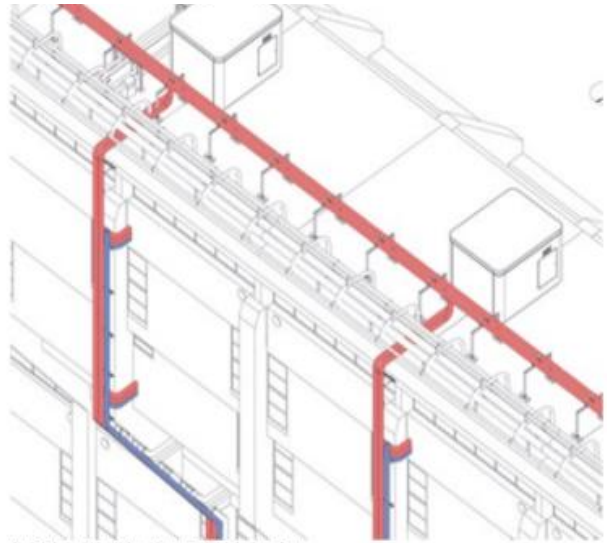


Image 2: Existing heating network on roof of Block A

3D View of Block A Roof - Typical

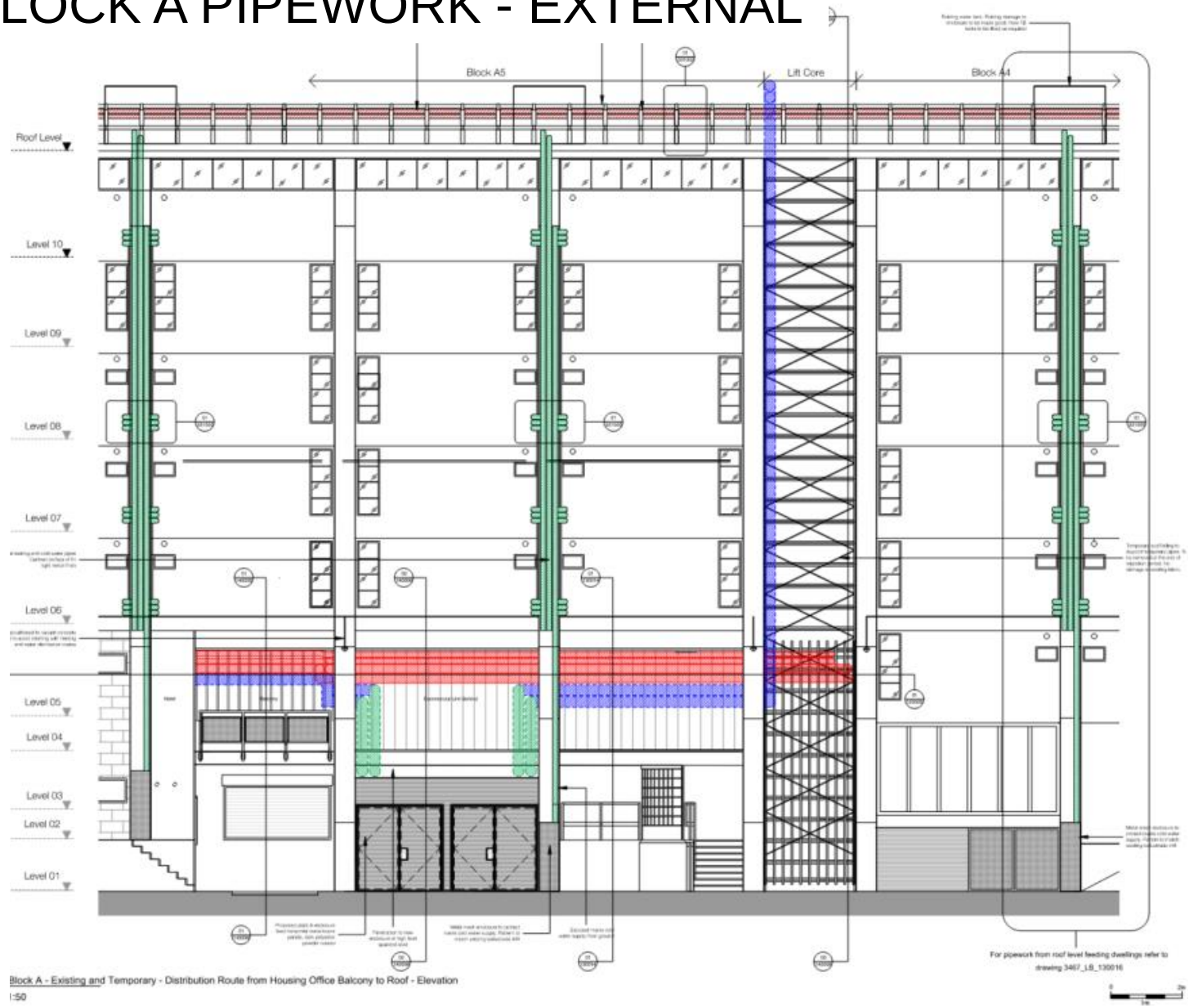


Aerial view of block A roof - typical north elevation

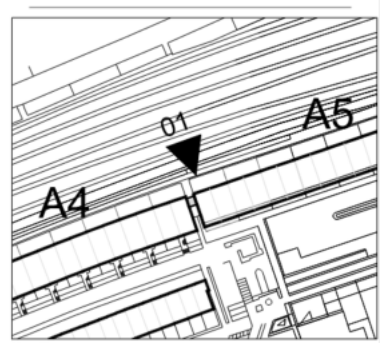
Proposed heating pipes

Proposed Mains Cold Water Pipe

BLOCK A PIPEWORK - EXTERNAL



Block A - Existing and Temporary - Distribution Route from Housing Office Balcony to Roof - Elevation
1:50



Key Plan

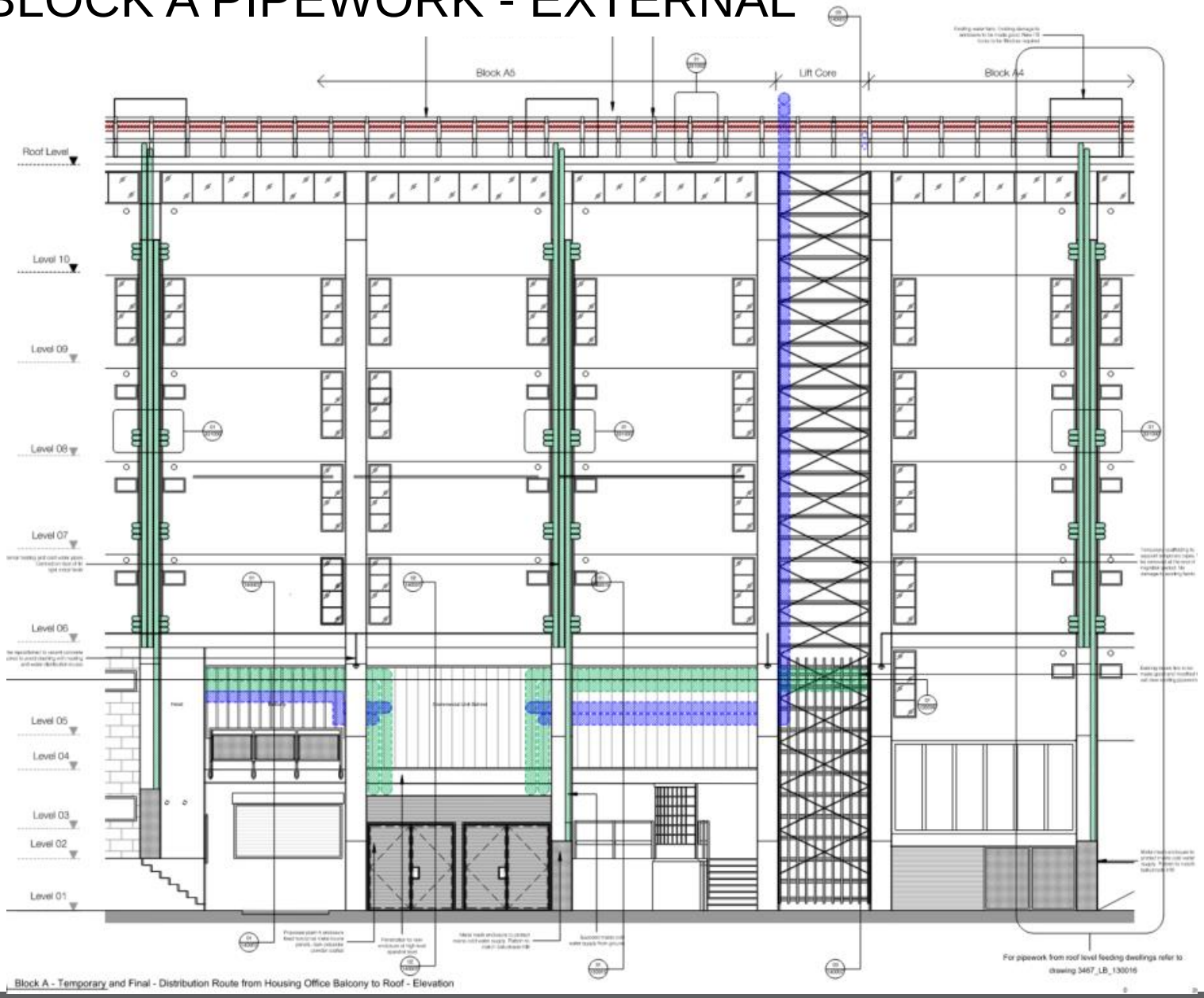
N

Proposed pipework for final install

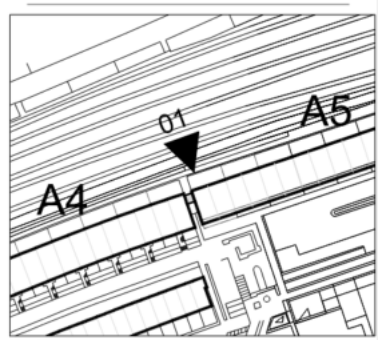
Proposed pipework for initial install, removed at end of migration period

Existing pipework retained in place during migration period.

BLOCK A PIPEWORK - EXTERNAL



Block A - Temporary and Final - Distribution Route from Housing Office Balcony to Roof - Elevation



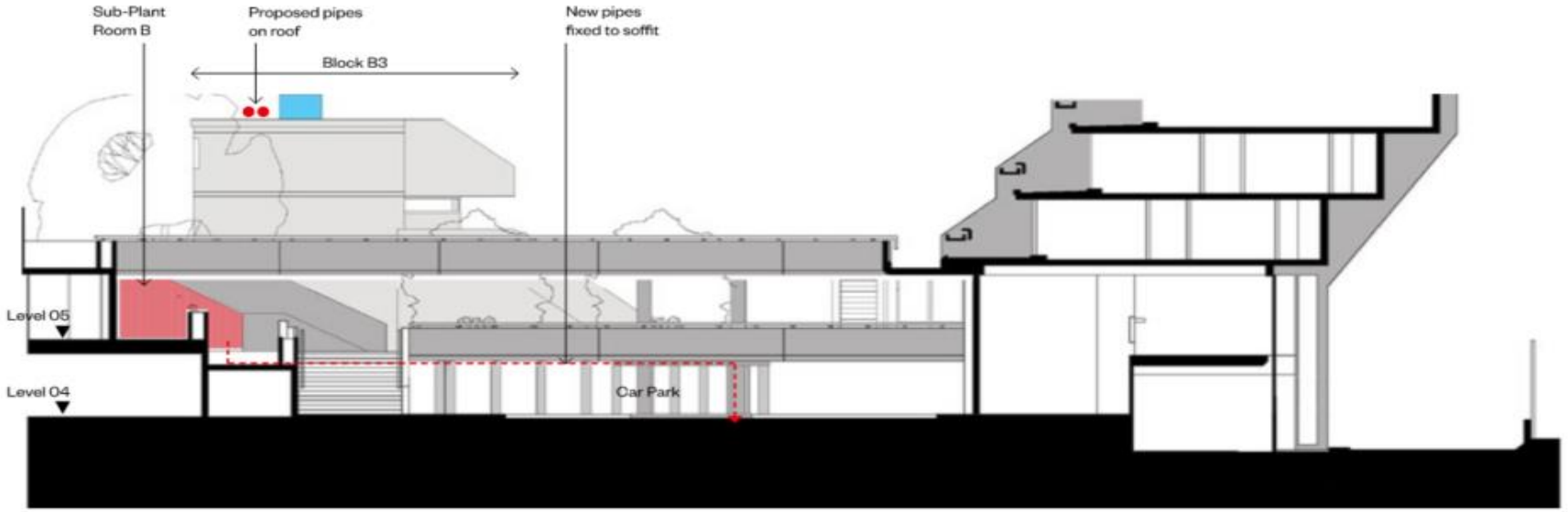
Key Plan

N

Proposed pipework for final install

Proposed pipework for initial install, removed at end of migration period

Existing pipework retained in place during migration period.



Section A

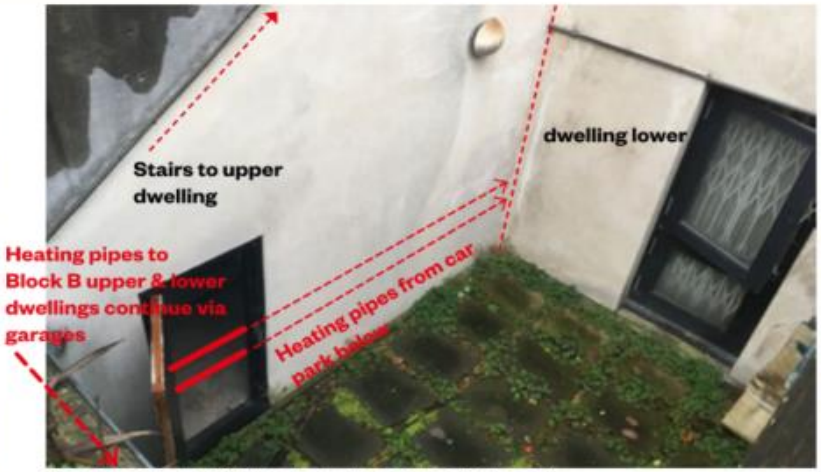
View of enclosure area below the stair. Proposed Sub-Plant Room highlighted by red dotted line

View from level 02 of car park entrance with proposed Sub-Plant Room B highlighted

PRINCIPLE ROUTES: BLOCK B PIPEWORK - EXTERNAL

Block B3 West gable elevation - proposed

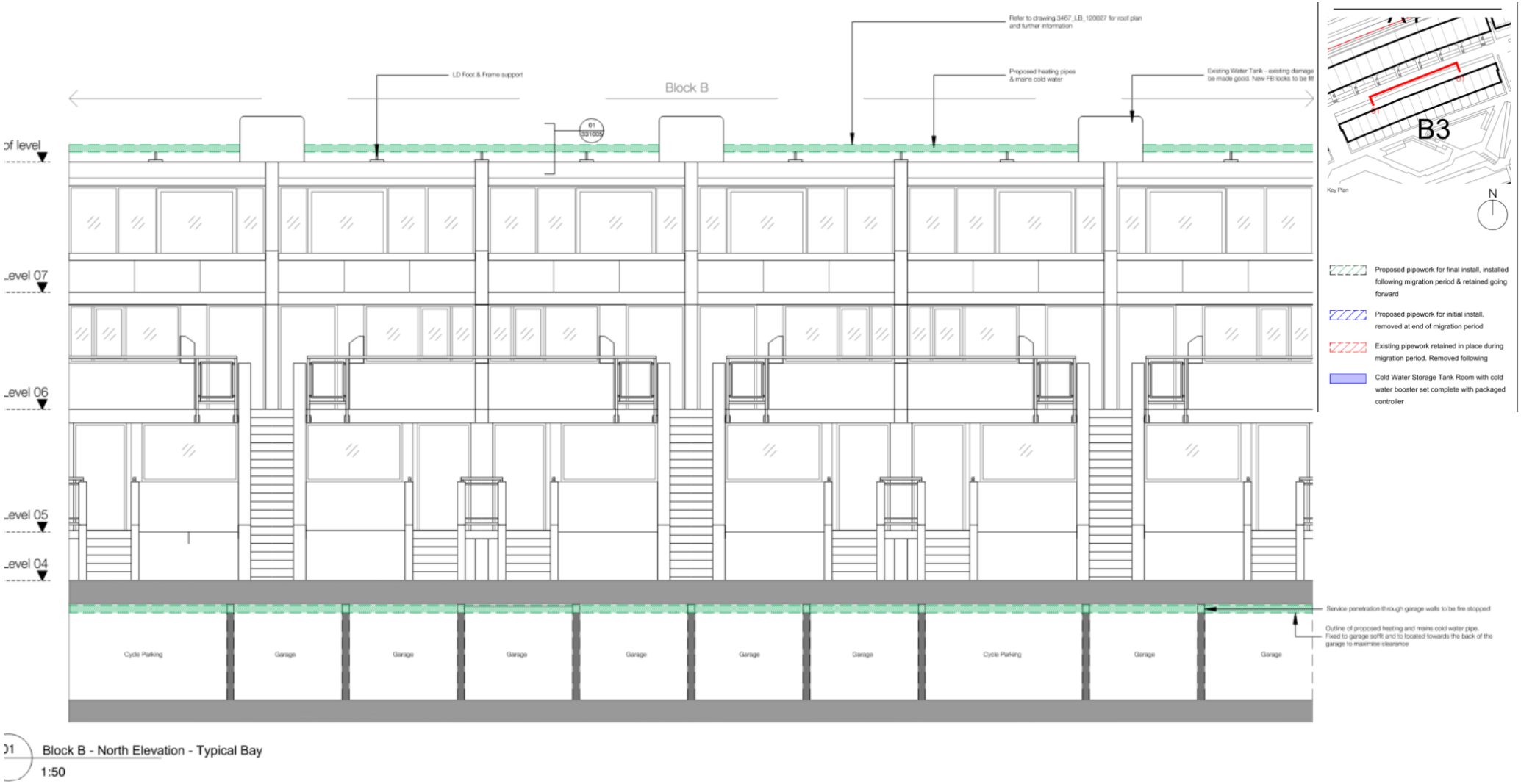
Block B West gable elevation - existing



Block B, Dwelling type B3 external ground floor terrace (Rowley way)

Existing and proposed heating and cold water pipework on western elevation of Block B

BLOCK B PIPEWORK - EXTERNAL



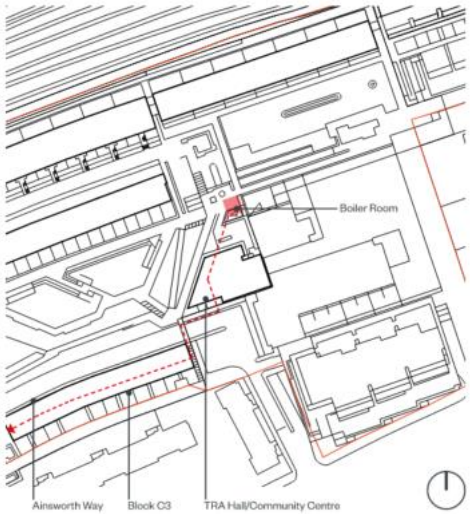
01 Block B - North Elevation - Typical Bay
1:50

PRINCIPLE ROUTES: BLOCK B PIPEWORK - EXTERNAL

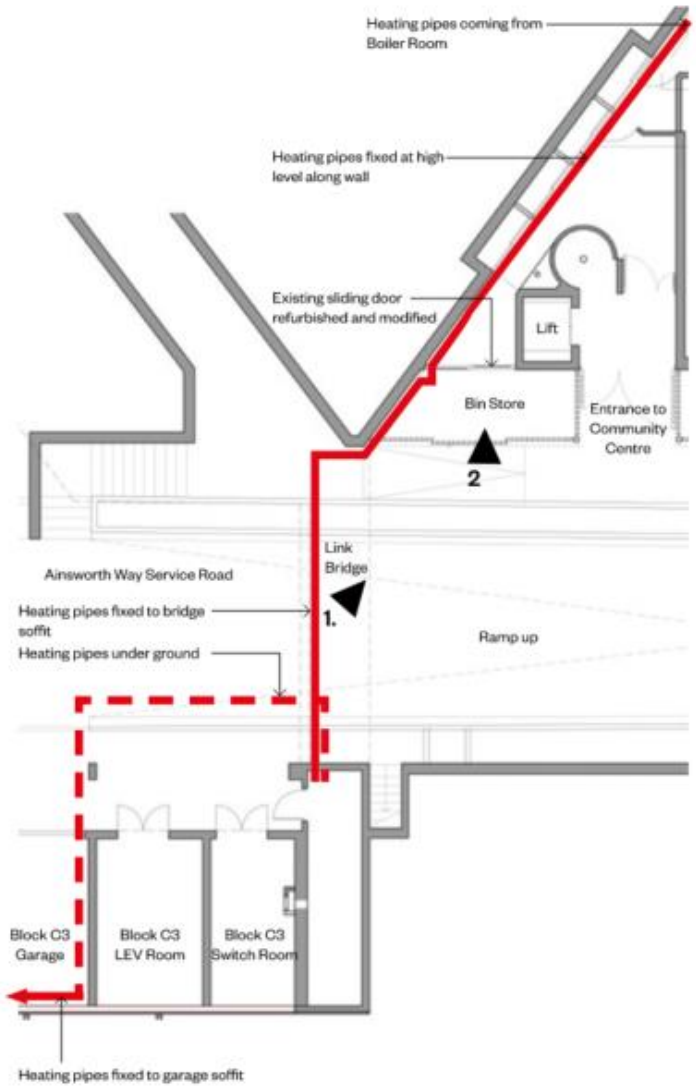
View of block B roof from Block A - Proposed

Typical bracing currently used elsewhere on Block B roof

View of block B roof from Block A - Existing



Plan view of Community Centre/TRA Hall and Block C3



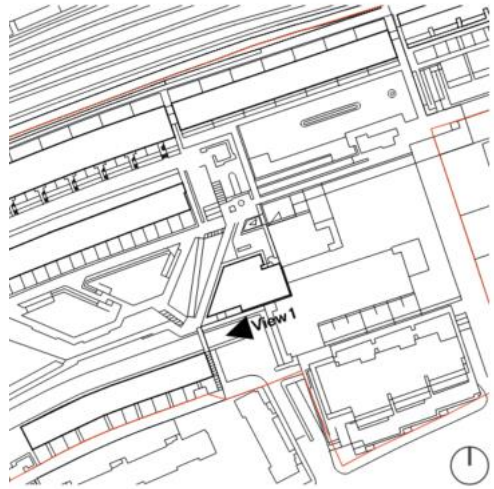
1. View of TRA Hall/Community Centre looking north from link bridge

2. View of Existing Doors from Bin Store.

Proposed Pipework

View 1: Bridge link between the community centre & block C seen from east. Proposed pipes fixed to underside of existing bridg.e

View 1: Bridge link between the community centre & block C.

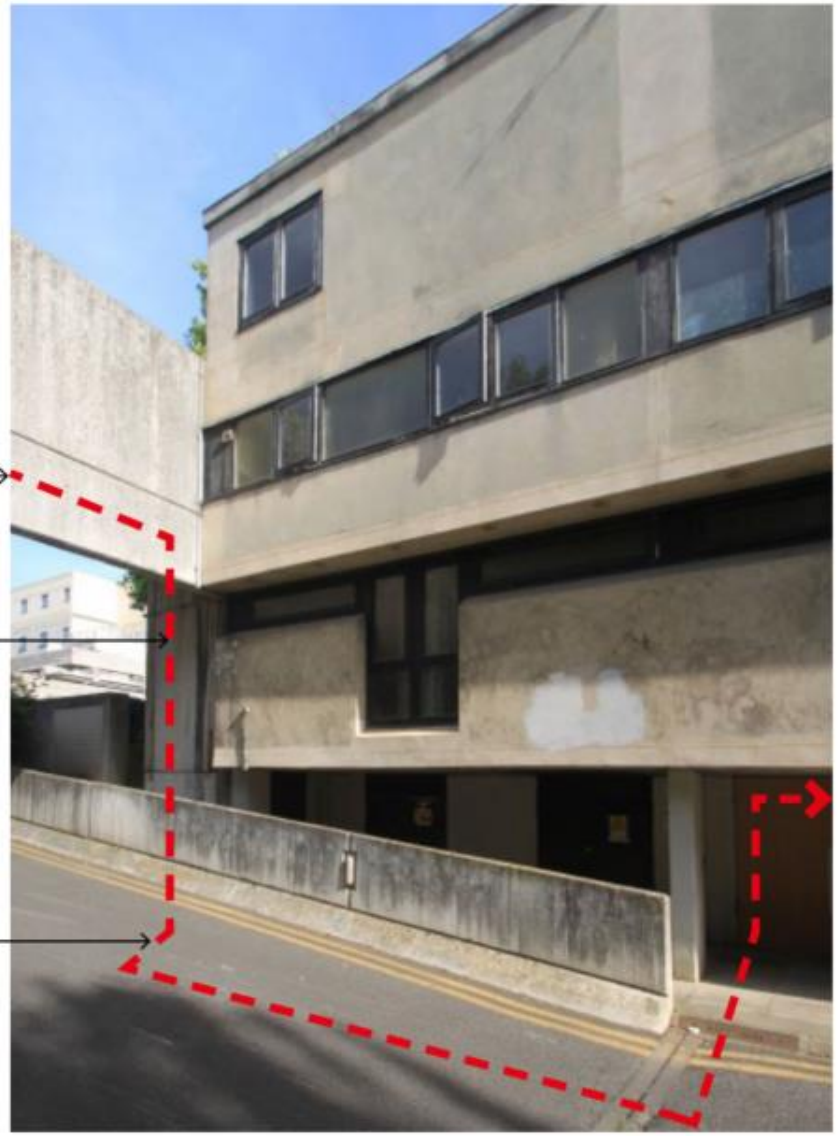


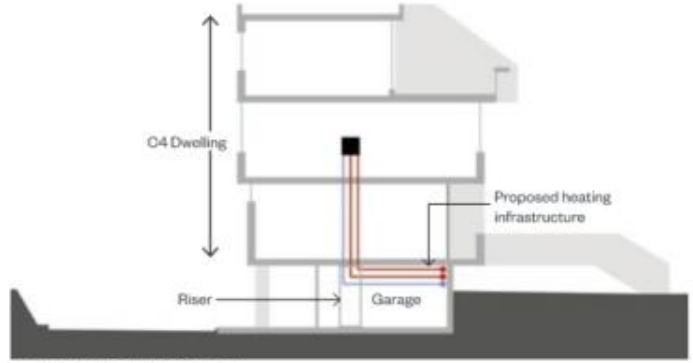
Proposed Pipework route behind downstand within encasing

Proposed Pipework within Landlord Store

Proposed Pipework buried underground in Ainsworth Way Service Road across to Block C Garages.

Pipework rise up above ground and fixed closely at soffit level to maximise clearance below.





Block C Cross Section looking east

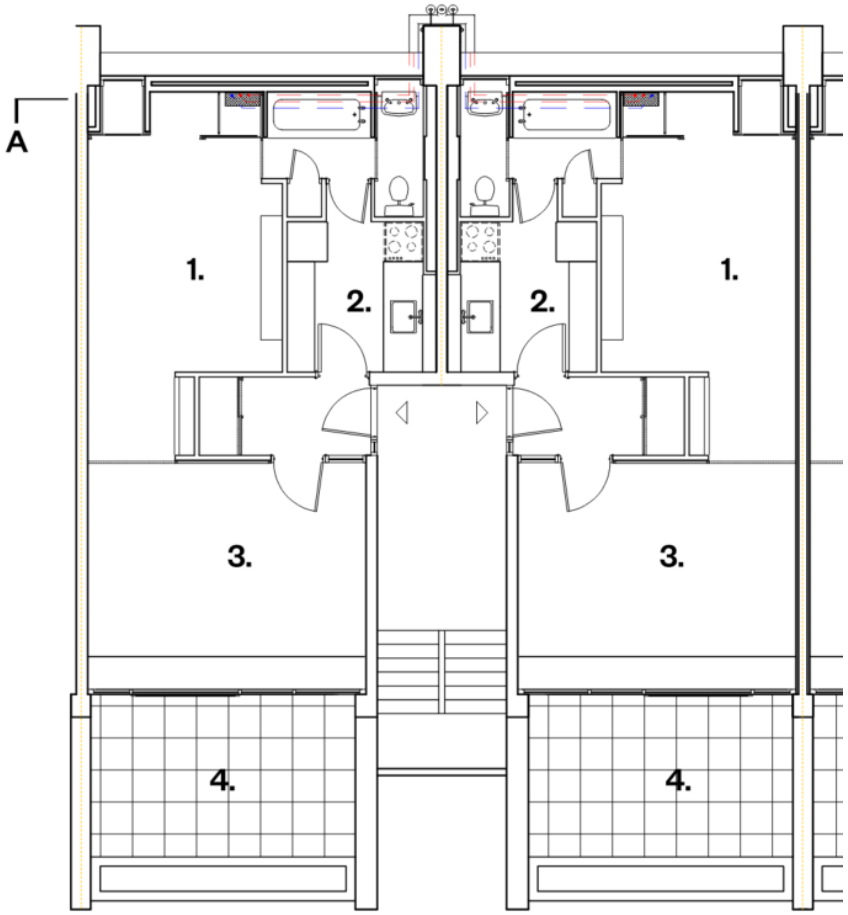
Each individual dwelling will be serviced by providing heating and main cold water supply through the risers in the garages and into the dwellings.

1. Langtry Walk. Proposed pipes burried below paving

2. Loudoun Road Block West elevation. Proposed heating pipes externally fixed to wall at ground floor level behind existing external staircase

3. Proposed heating pipes to come up through floor of existing plant room located underneath external ramp at Alexandra Place

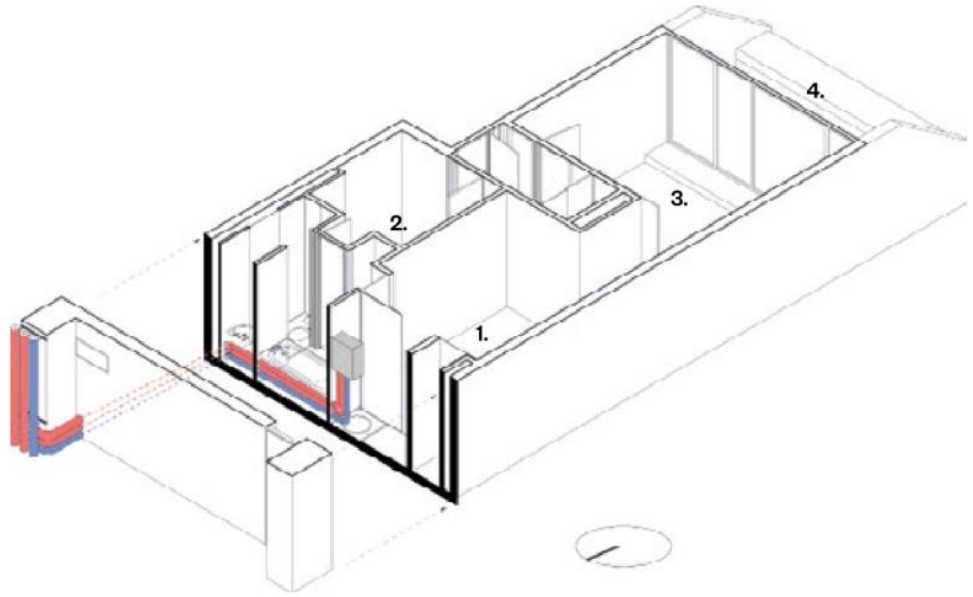
Principal routes – Loudoun Road / Alexandra Place



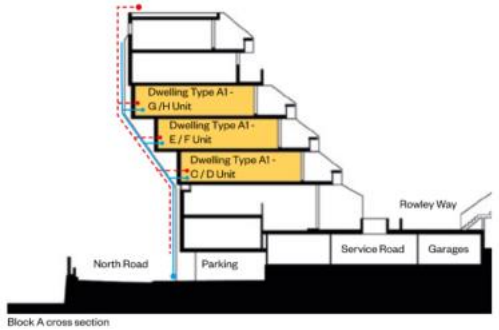
Dwelling Type A1 - Heating & Mains Cold Water Supply

1. Bedroom
2. Kitchen
3. Living room
4. External terrace

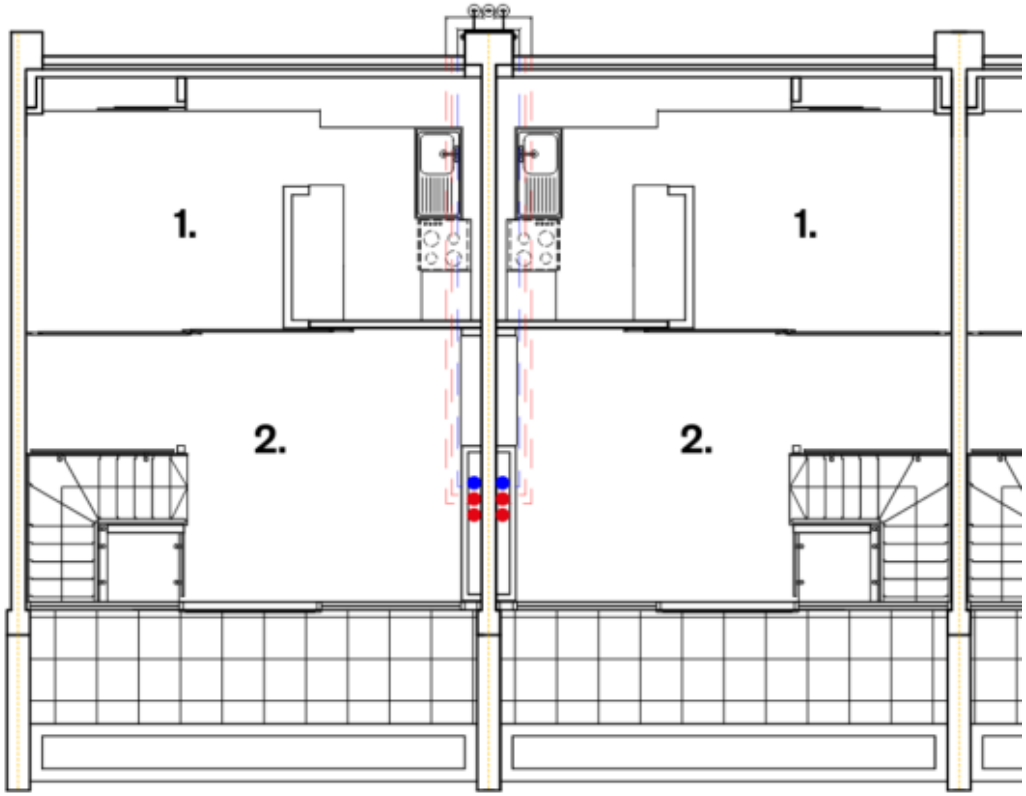
Heat interface unit
Mains cold water supply
Heating pipes
Party Wall



Dwelling Type A1 - 3D sectional View A



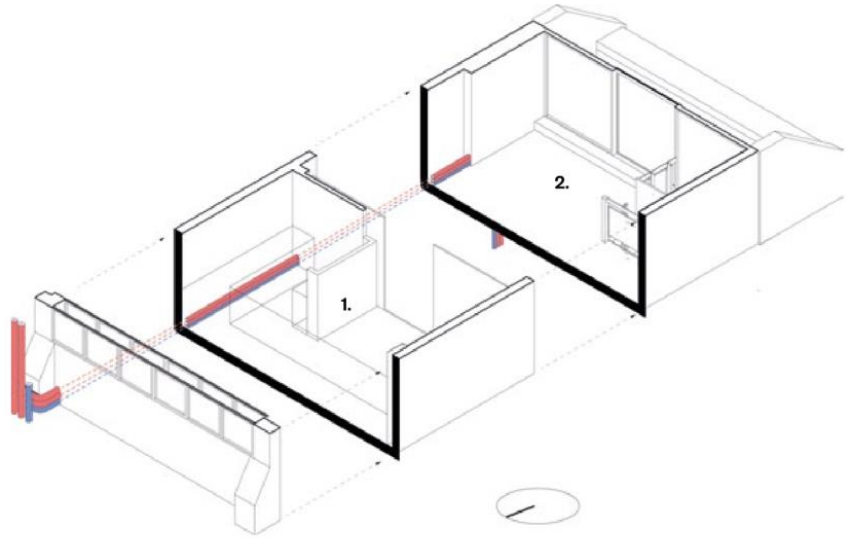
Block A cross section



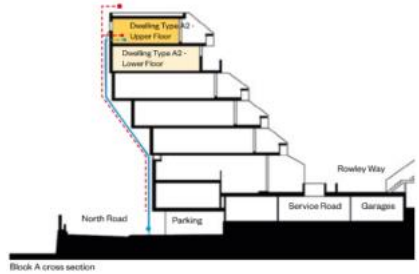
Dwelling Type A2 - Heating & Mains Cold Water Supply - Upper Floor

Heat interface unit
Mains cold water supply
Heating pipes
Party Wall

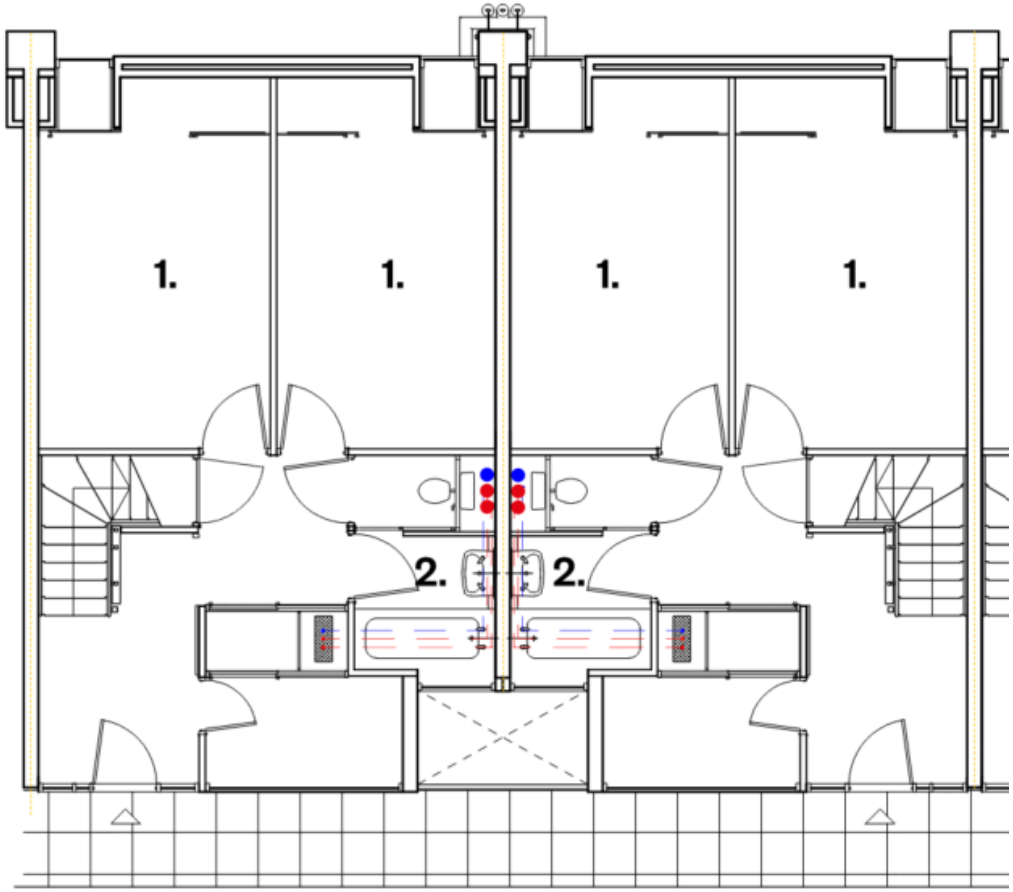
1. Kitchen
2. Living room



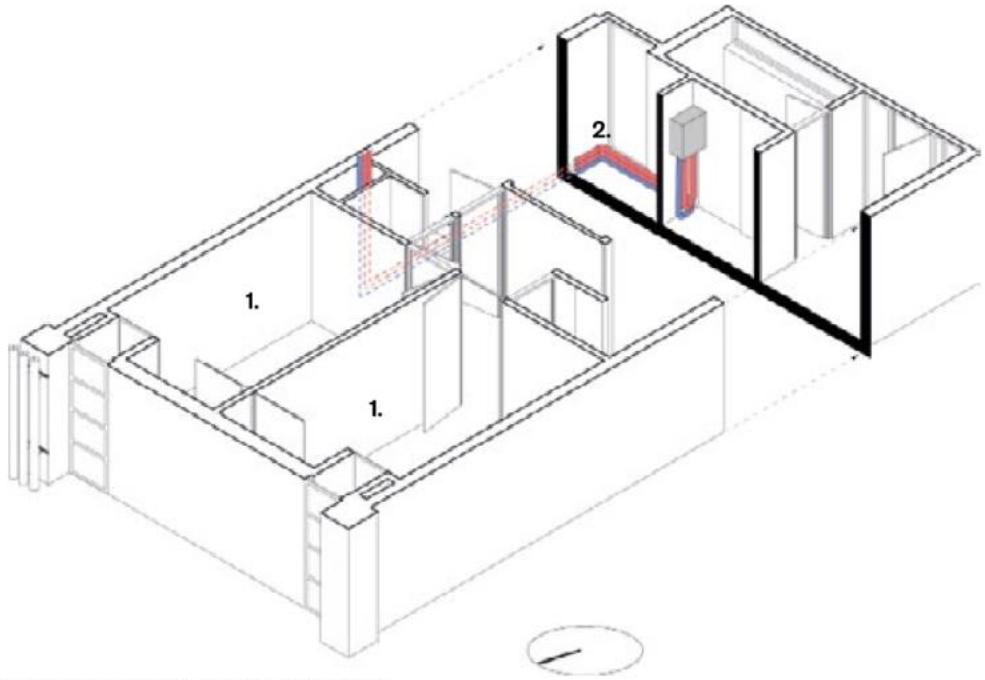
Dwelling Type A2 upper plan - 3D sectional View



Block A cross section



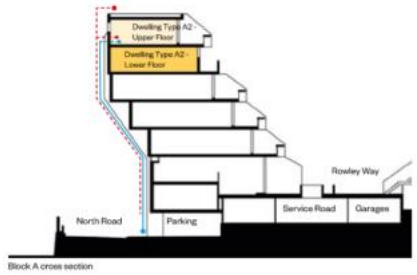
Dwelling Type A2 - Lower Plan



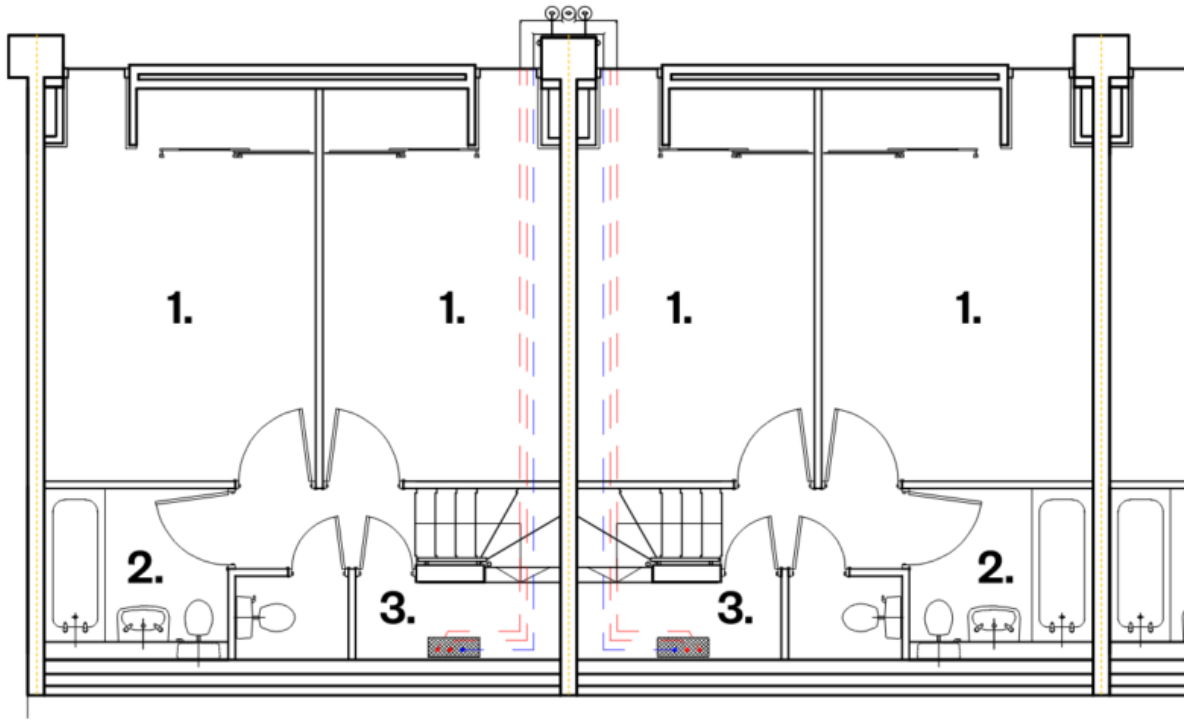
Dwelling Type A2 lower plan - 3D sectional View

Heat interface unit
Mains cold water supply
Heating pipes
Party Wall

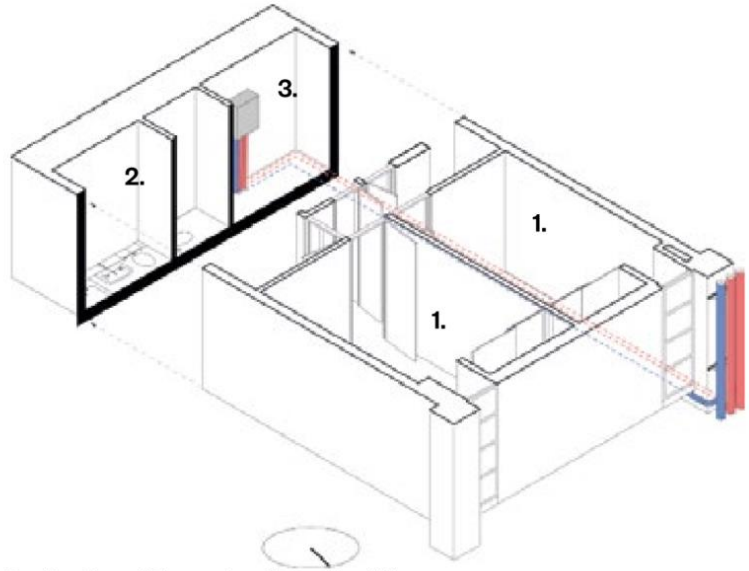
1. Bedroom
2. Bathroom



Block A cross section



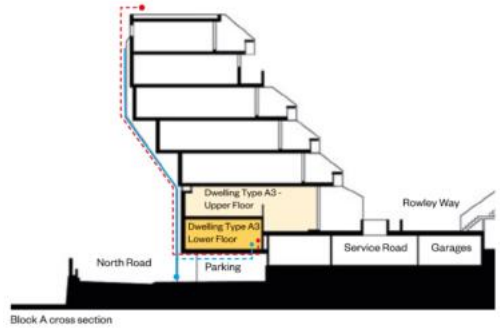
Dwelling Type A3 - Lower Plan



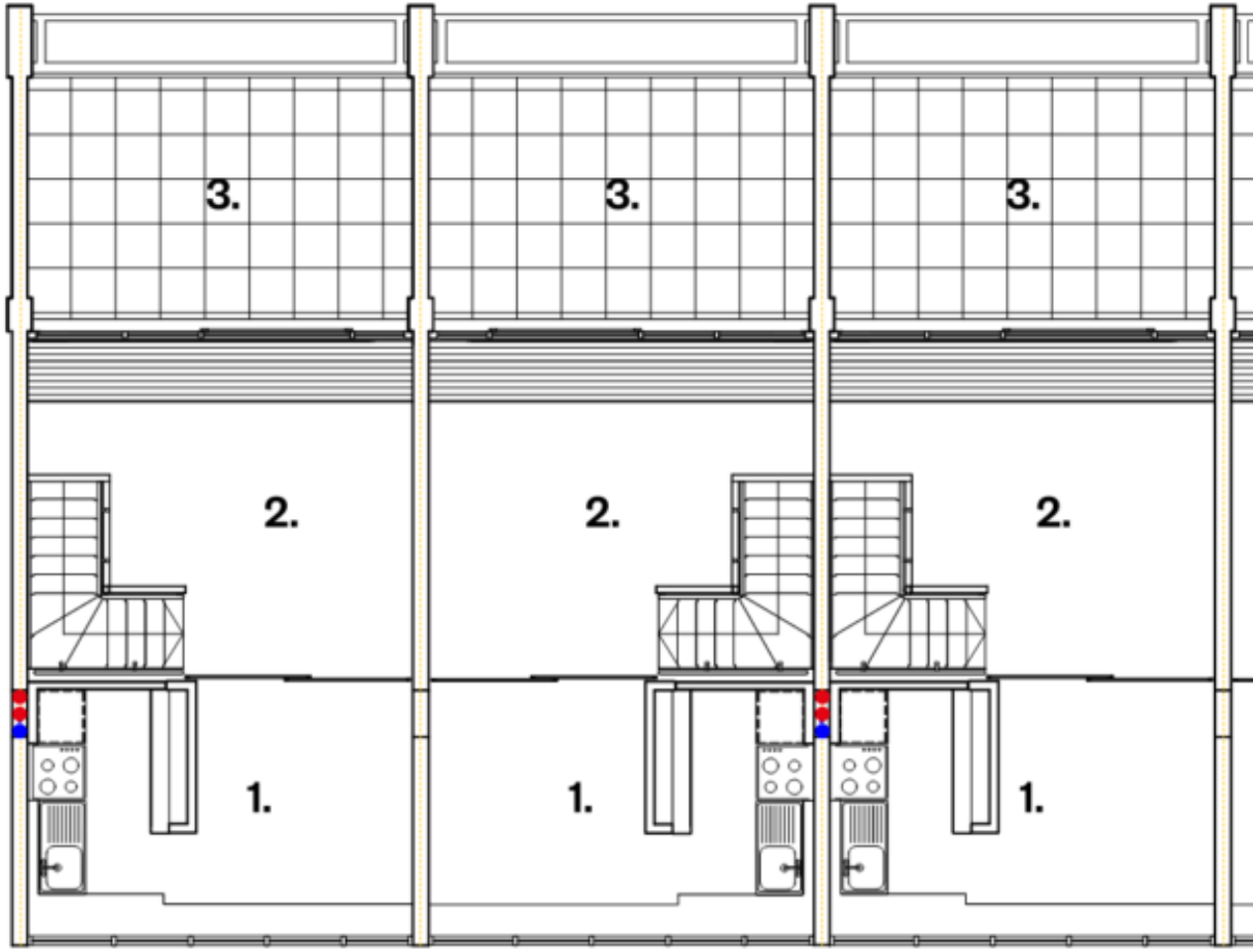
Dwelling Type A3 lower plan - 3D sectional View

Heat interface unit
Mains cold water supply
Heating pipes
Party Wall

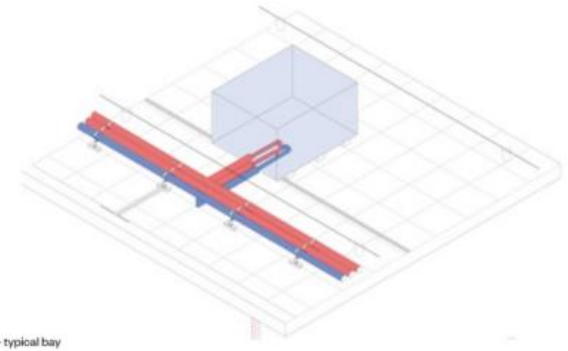
1. Bedroom
2. Bathroom
3. Cupboard (underneath stairs)



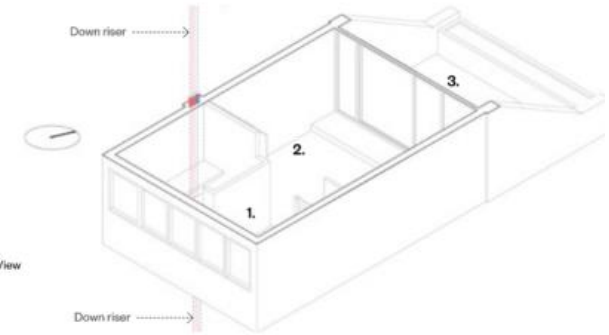
Block A cross section



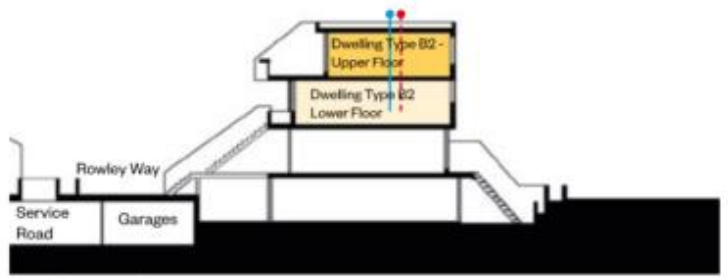
Dwelling Type B2 - Upper Plan



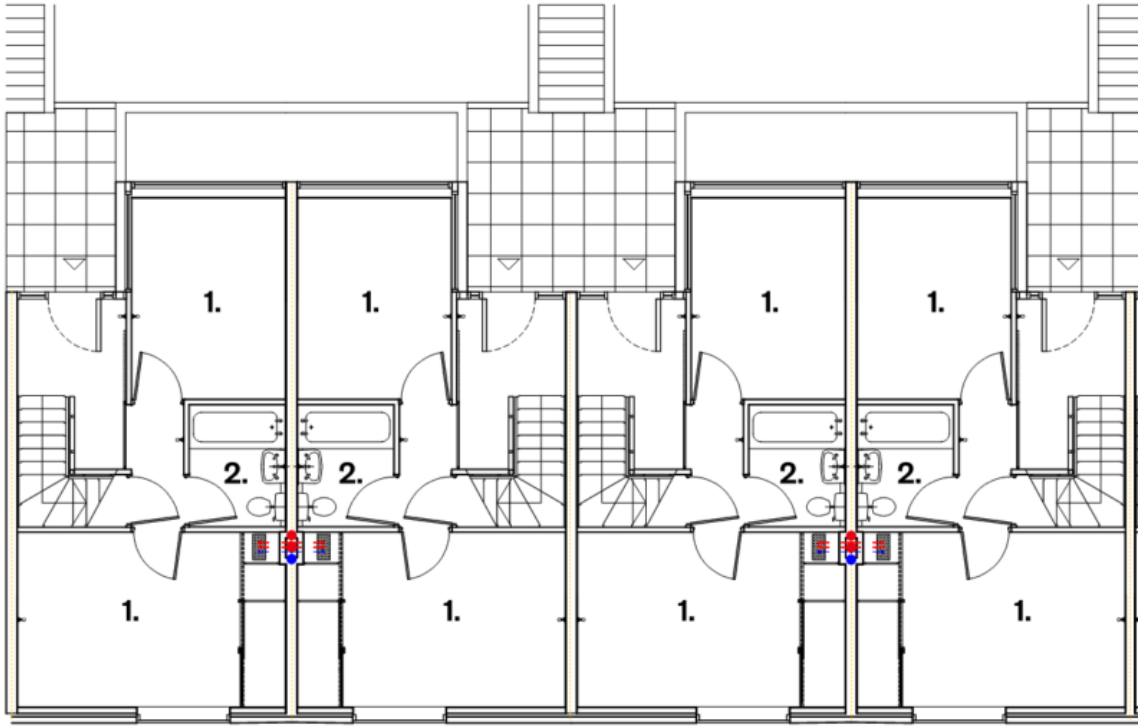
Block B 3D view of roof - typical bay



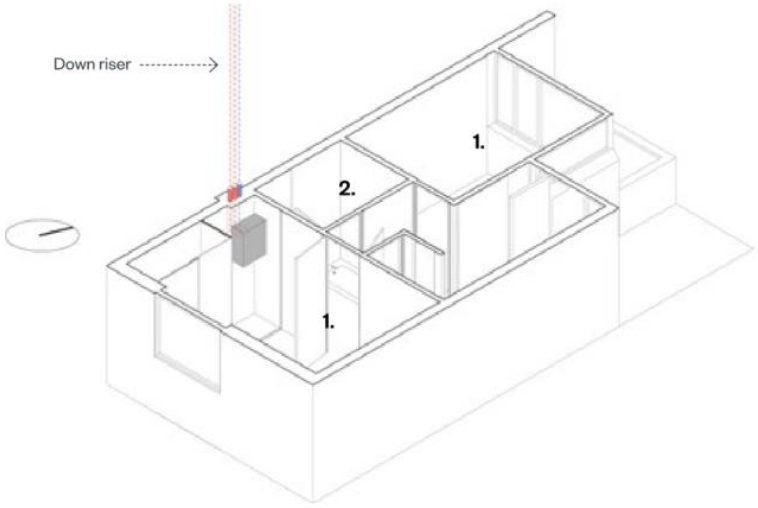
Dwelling Type B2 upper plan- 3D View



Block B cross section



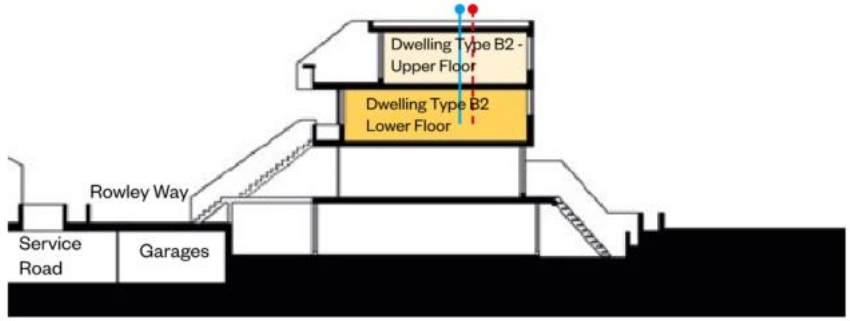
Dwelling Type B2 - Lower Plan



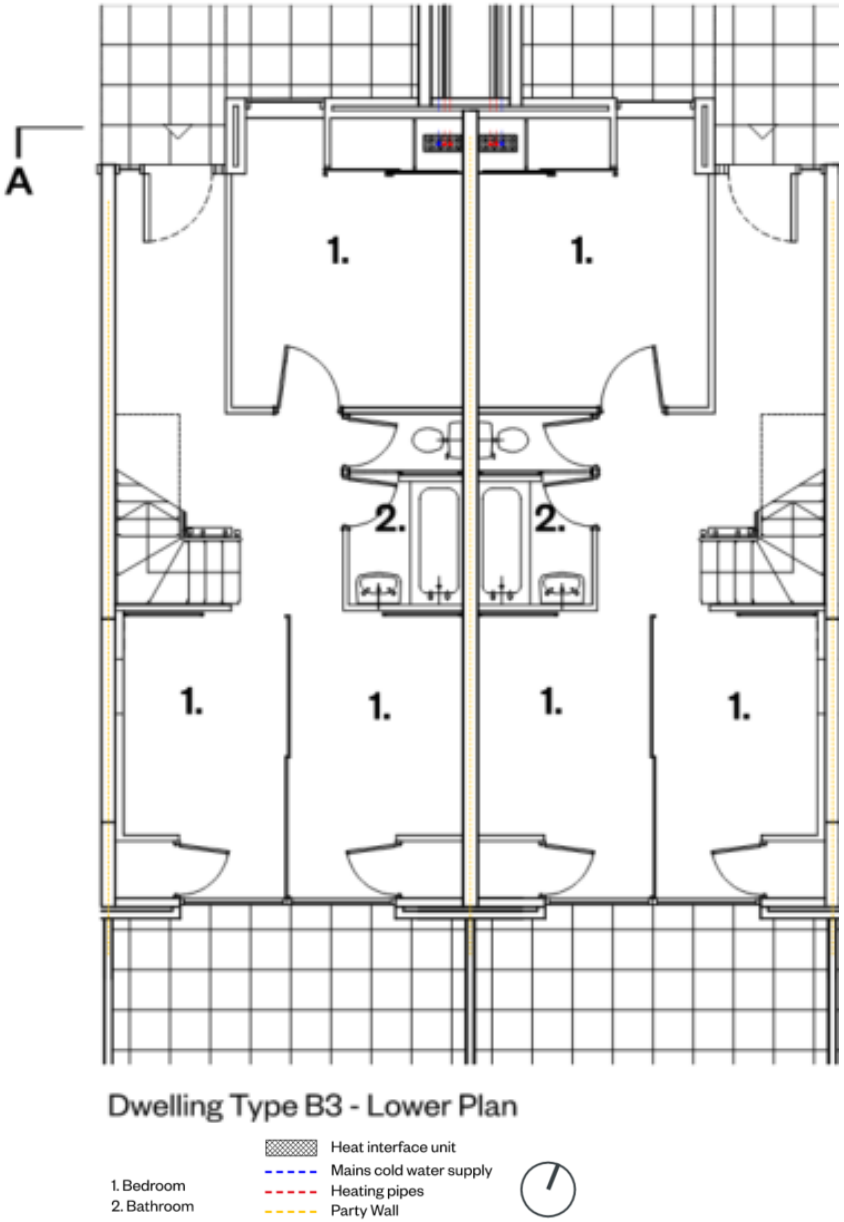
Dwelling Type B2 lower plan- 3D View

Heat interface unit
Mains cold water
Heating pipes
Party Wall

1. Bedroom
2. Bathroom



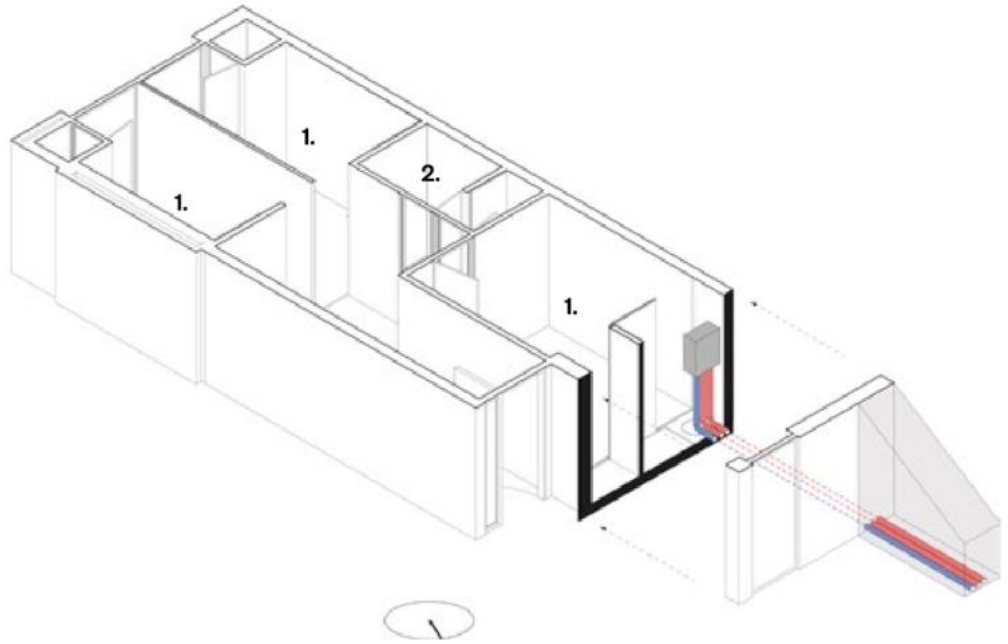
Block B cross section



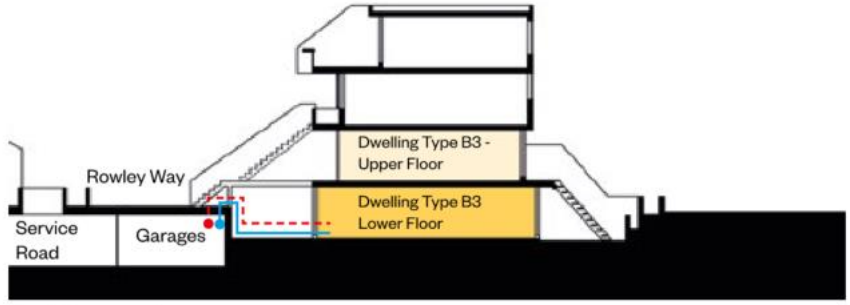
Dwelling Type B3 - Lower Plan

1. Bedroom
2. Bathroom

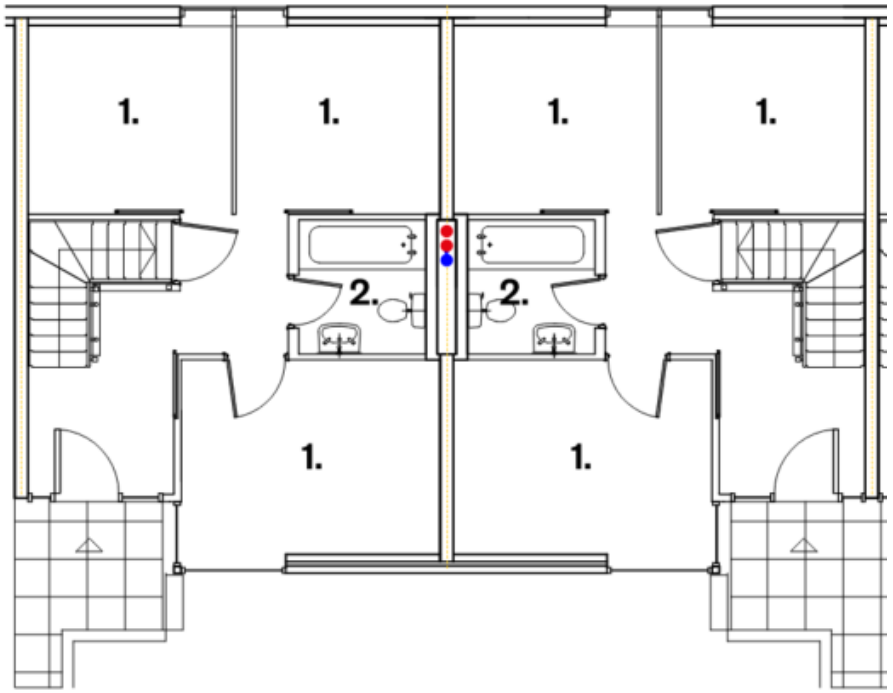
Heat interface unit
Mains cold water supply
Heating pipes
Party Wall



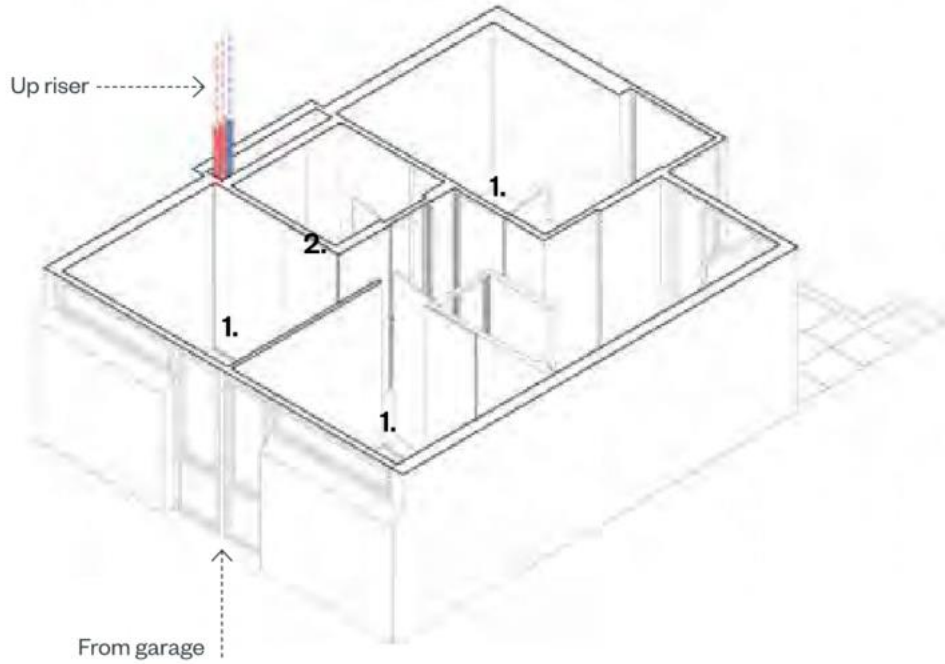
Dwelling Type B3 lower plan- 3D Sectional View A



Block B cross section



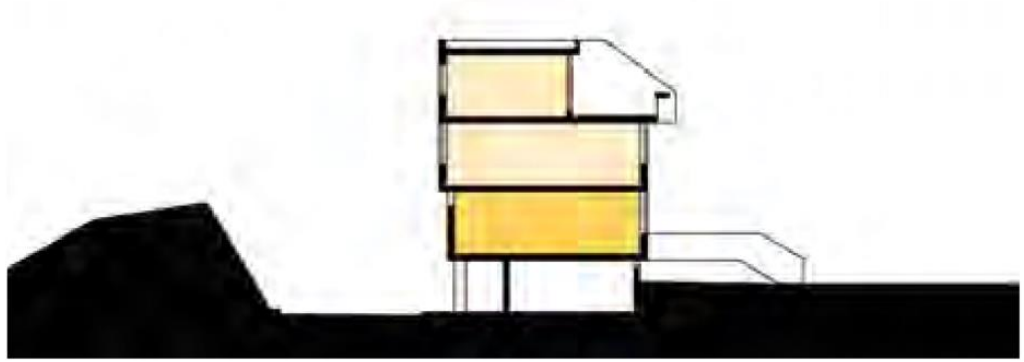
Dwelling Type C4 - Ground Floor Plan



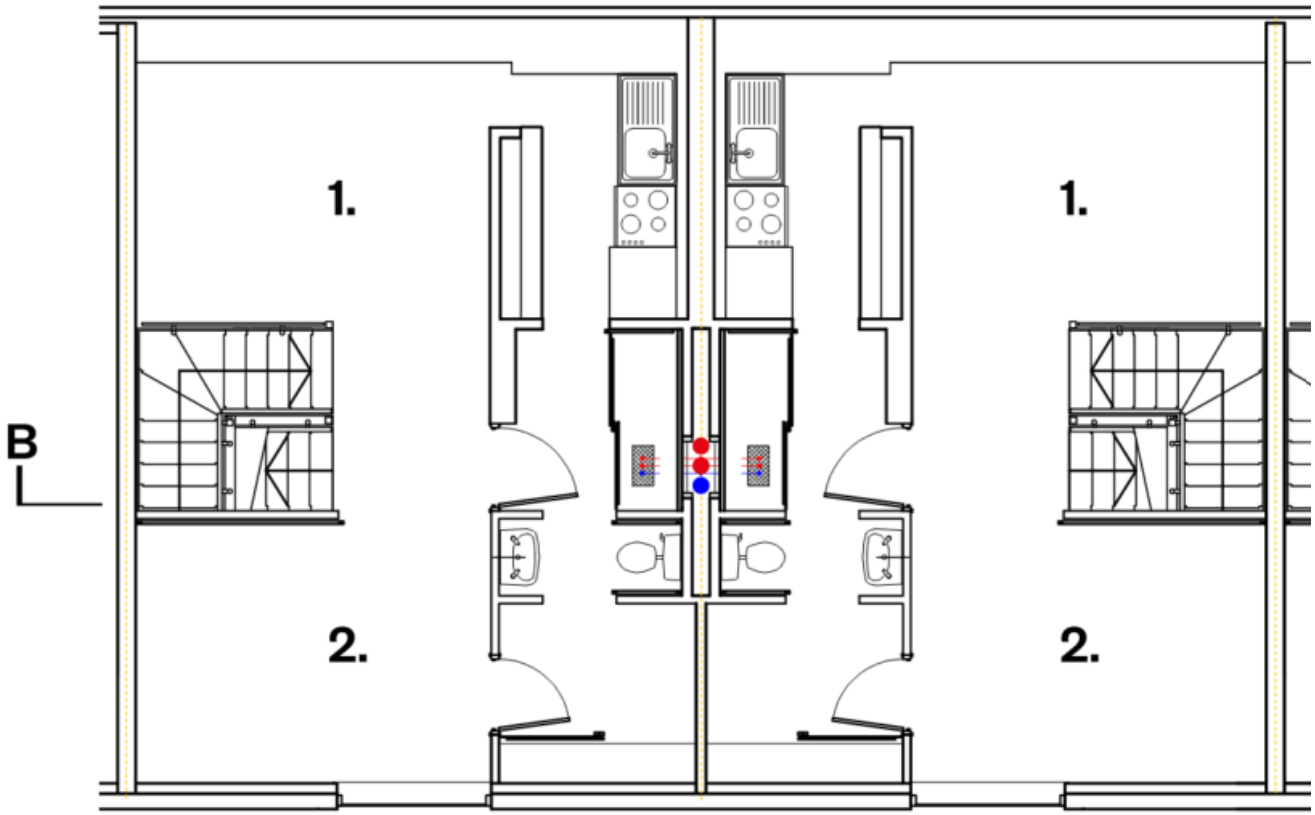
Dwelling Type C4 lower plan- 3D View

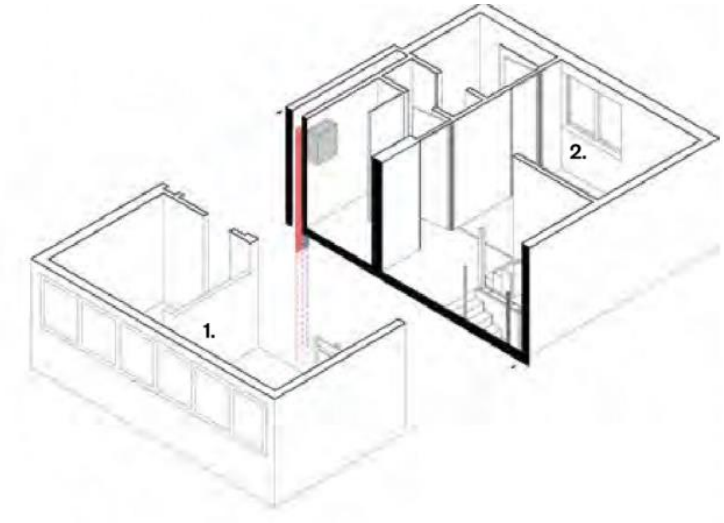
1. Bedroom
2. Bathroom

Mains cold water supply
Heating pipes
Party Wall



Block C cross section





Dwelling Type C4 first floor plan- 3D sectional view

Dwelling Type C4 - first floor Plan

Heat interface unit
Mains cold water supply
Heating pipes
Party Wall

1. Kitchen/Dining
2. Living Room