

4 Collard Place  
Camden  
London  
NW1 8DU  
21<sup>st</sup> June 2016

**Reference Planning Application No. 2016/2457/P**

Dear Mr. Tulloch,

As owners of the property at 4 Collard place we wish to raise our strongest objections for the Planning Application in regards to the proposed re-development of 1-3 and 4-8 Ferdinand Place our property adjoins site A (4,6 and 8 Ferdinand Place) and is in very close proximity to site B (1, 3 Ferdinand Place).

We understand that Levertons may wish to upgrade their undertaking facilities but this should not be at the expense of and detriment to their neighbours.

We feel this proposed development is grossly overbearing on our property especially as the current building at site A is a single storey garage, which is proposed as a basement and four storey development while site B is currently a 2 storey building, proposed to be a five storey building. This would result in a great sense of enclosure, loss of light and full use of our garden as they would tower over our small 3 storey house.

We are also very concerned that neighbours who attended the same consultation as ourselves seem to have been told different things and that the plans as shown do not correspond with either, and at times conflict with other bits of the written proposals/artwork on the submitted planning drawings and details, which also do not appear to be to scale or have measurements readily available, this is both confusing and very worrying as we cannot make realistic comparisons with the plans proposed. These two developments would cause us to be overlooked from a few metres away with the resulting loss of privacy, sunlight and daylight to all 3 floors of our windows, and garden, especially as the sun travels from Harmood Street and around to Ferdinand Street on plan in an East - South to West direction. The building proposed obscuring the suns path to our property as it travels around. See attached diagram A

We were told at the consultation that no windows or balconies would overlook us, however on these plans there are terraces at first floor level on site A with windows/French doors, we had been assured that none of the occupants of the building would be able to access what we were told was a biodiversity brown roof construction. The terraces on the consultation documents were of a smaller surface area and therefore further away from the boundary and surrounded with the brown roof construction. Our concern is that with or without planning consent the residents of the building could access and make, use of the flat area which is at the top of our garden wall level directly opposite our living room -resulting in invasion of our privacy also potential risk of falls (or littering) noise, light and odour pollution into our property from outside socialising. After all the terraces are only surrounded by a privacy screen and could be easily removed Also at 2<sup>nd</sup> floor level there is potential for overlooking from the 2 splayed windows indirectly. The roof level is flat and appears to have access for maintenance, how is this to be controlled to prevent unauthorised access? At the roof level the lift motor room / over-run zone appears to be of different dimensions depending on which drawing / detail one looks at?

On site B there are many windows on the elevation of the building towards us, and also 2 terraces at 5<sup>th</sup> floor level all giving a feeling of being on a parade ground whilst in the gardens of our property. This proposed building will still further restrict the available light into the property and garden area. Other issues are the ventilation shaft / slot shown at first floor level on site A, adjacent to our boundary, we have major concerns about noise and pollution from this area with what could be vented over us and our neighbours.

The gable wall indicated on the proposed drawing seems of larger dimensions vertically than the gable wall is currently.

The proposed development of 4-8 Ferdinand Place would appear to be of a blue / black brick façade. This would be not in keeping with any buildings in the proximity, and therefore a potential eyesore, and also would further suppress the feeling of light and airiness of our property, garden, and outlook that we currently enjoy.

We respectfully request that the council investigate our concerns and refuse planning permission for this overdevelopment and to reduce the size of any future proposed development on this site to the size and footprint of the current buildings, and to make proper provision for privacy.

We seriously question whether this location is appropriate for this type and scale of development. In view of our concerns with this proposed development we have asked for a Planning Consultant to review the plans submitted and carry out a report on his findings, which are to be submitted separately to you.

Should you wish to look at the current situation and views this could be easily arranged via our neighbours or us, whichever is the more convenient for you.

Regards,

A large black rectangular redaction box covering the signature area.

Gordon and Dianne Parker-Whitten

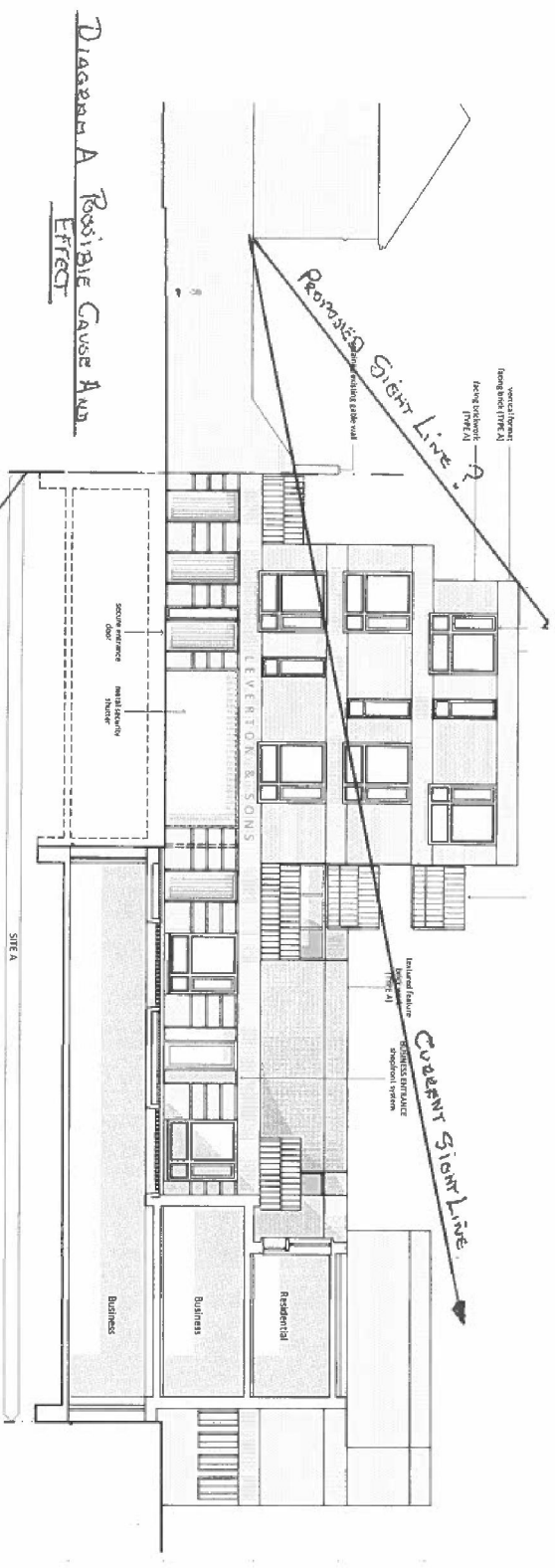
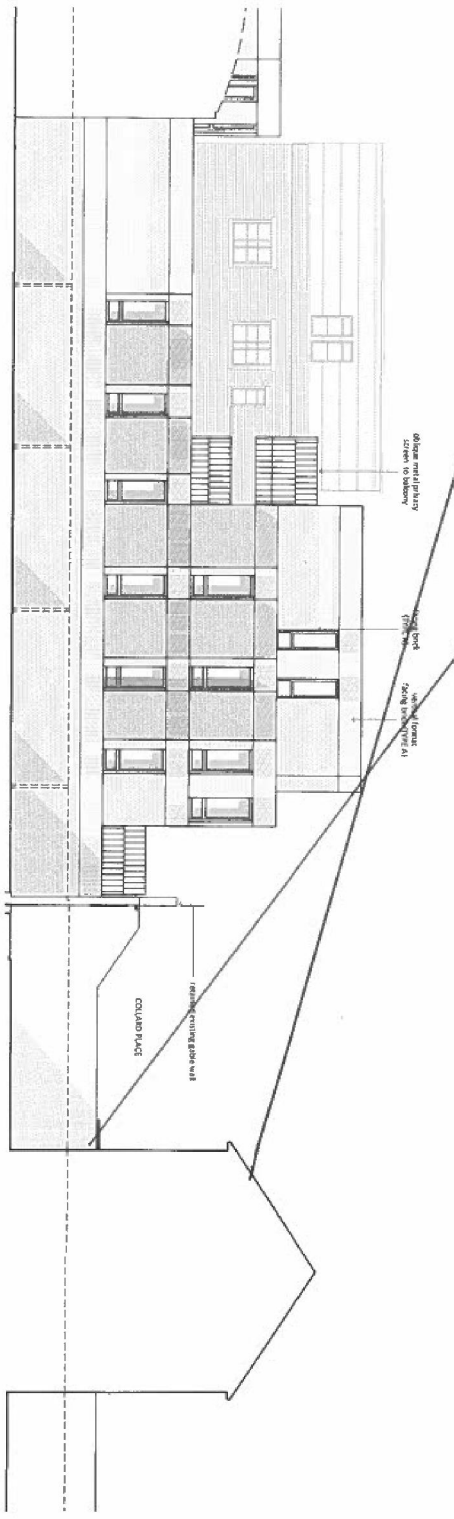


Diagram A Possible Cause Area Effect

IN W1 - West (Ferdinand Place)  
WINDY SUN

POSSIBLE OVERSHADOWING CAUSED BY DEVELOPMENT





Phillips Planning Services Ltd.  
Town Planning and Development Consultants

Our Ref: P164917

22 June 2016

Mr Rob Tulloch  
Development Management  
London Borough of Camden  
Camden Town Hall  
Judd Street  
London  
WC1H 9JE

Dear Mr Tulloch,

**Planning Application 2016/2457/P**  
**'Demolition of existing buildings and erection of new buildings to provide replacement funeral directory facility at ground and basement levels of 4-8 Ferdinand Place. Provision of nineteen Class C3 residential units (5x 1 bed, 8 x 2 bed and 6 x 3 bed units), split across eight units provided at first, second and third floor levels at 4-8 Ferdinand Place and eleven units at ground to fourth floor level at 1-3 Ferdinand Street' at 1-3 and 4, 6, and 8 Ferdinand Place, London**

We write on behalf of Mr G. Parker-Whitten of no. 4 Collard Place, London, in objection to this planning application.

Having reviewed the documents and information available on the council's website, our client holds significant concerns regarding the proposals, particularly in respect of the very obviously harmful impacts which would directly affect the amenity of his property.

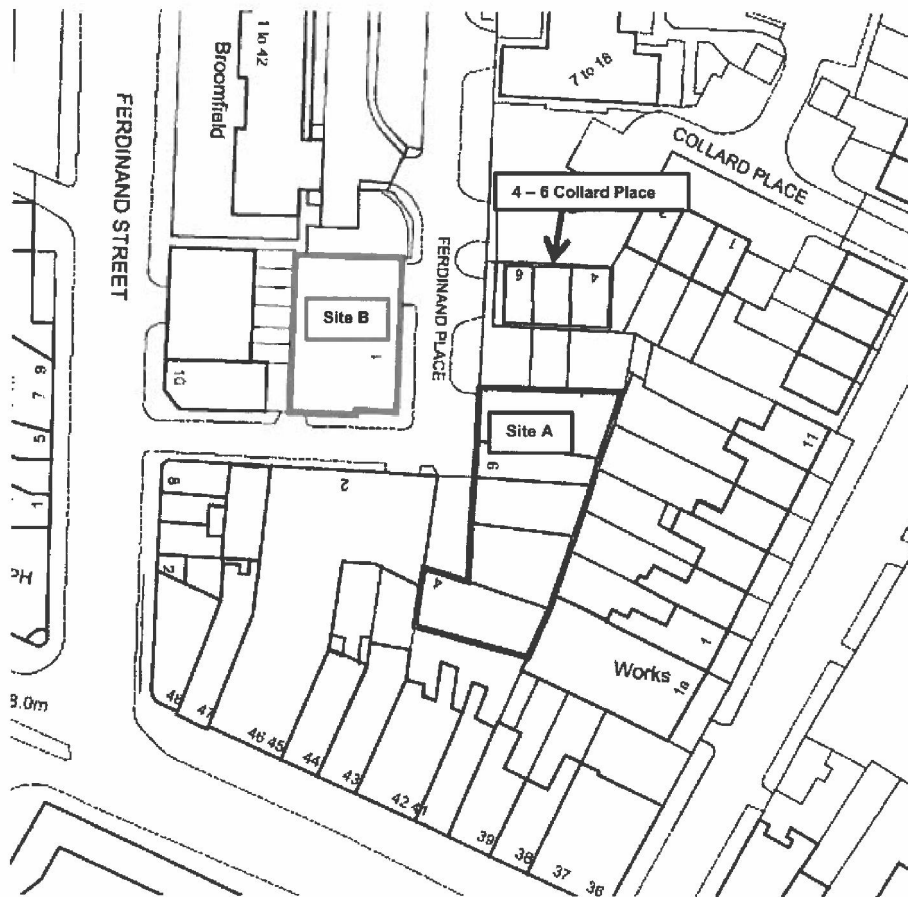
There are also concerns regarding the accuracy and consistency of supporting documentation and plans submitted with the application.

We expand upon these matters below.

**Impact on Collard Place**

No. 4 Collard Place is a three storey dwelling and forms part of a small terrace of three dwellings (Nos. 4, 5 and 6) located directly to the north of 'Site A' and to the east of 'Site B' of the application site.

The rear of the properties face south so that the windows on the southern elevation serving habitable rooms and the rear gardens to the properties adjoin and look directly out onto 'Site A' (4-8 Ferdinand Place). The side elevation of the terrace faces 'Site B' The side of No. 6 and contains a second floor window.



OS plan extract showing the application sites in relation to Nos 4 – 6 Collard Place

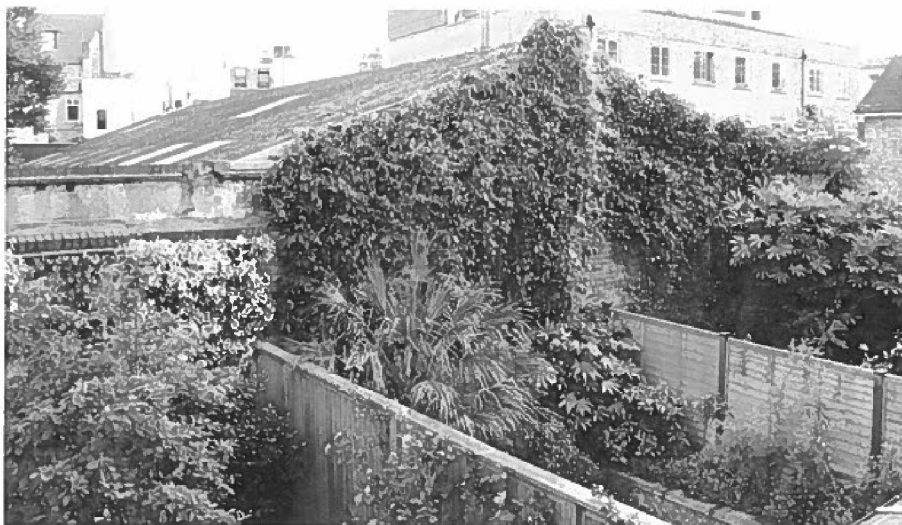
As is apparent the gardens of the Collard Place properties are quite short, so the backs of the houses are approximately 6 - 7 metres from the boundary with Site A.

At the present time however the relationship whilst not ideal is not materially harmful due to the scale of the building that occupies site A. This is single storey with a flat roof where it adjoins the rear garden of No. 4 rising to a pitch (although still single storey) behind Nos 5 and 6.

The first of the photographs below shows a view from the rear ground floor window of No. 4. The second shows a view looking across the rear gardens of 5 and 6 toward the pitched roof section of the existing building.

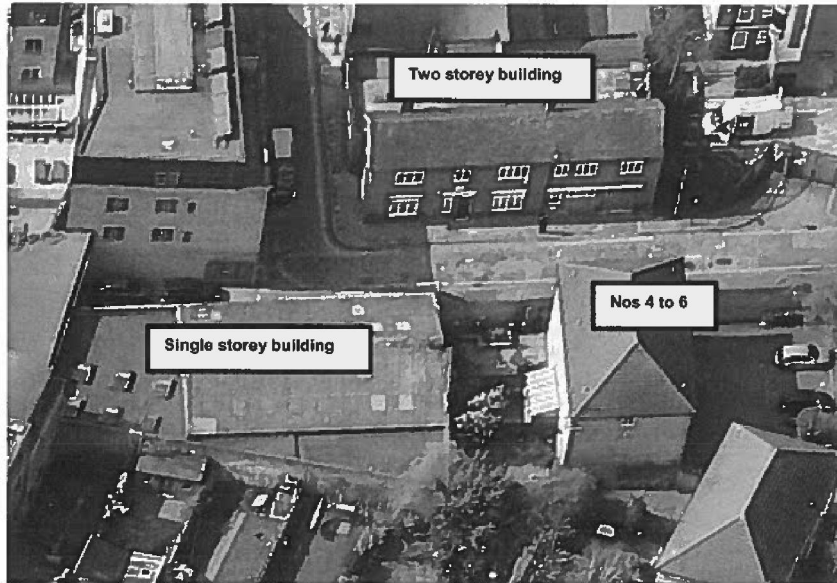


**View from the rear of No.4 Collard Place showing flat roof and part of pitched roof**



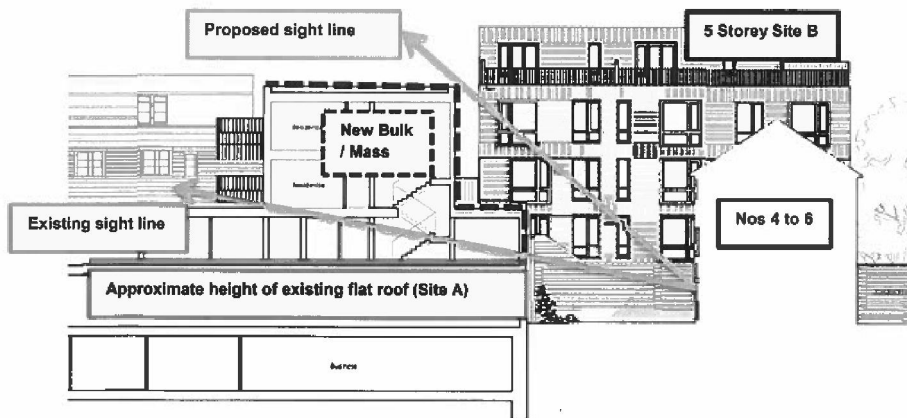
**View showing the pitched section of the building behind Nos 5 and 6 Collard Place**

The existing building on 'Site B' is of two storey scale were it fronts onto Ferdinand Place as shown on the aerial photograph below.

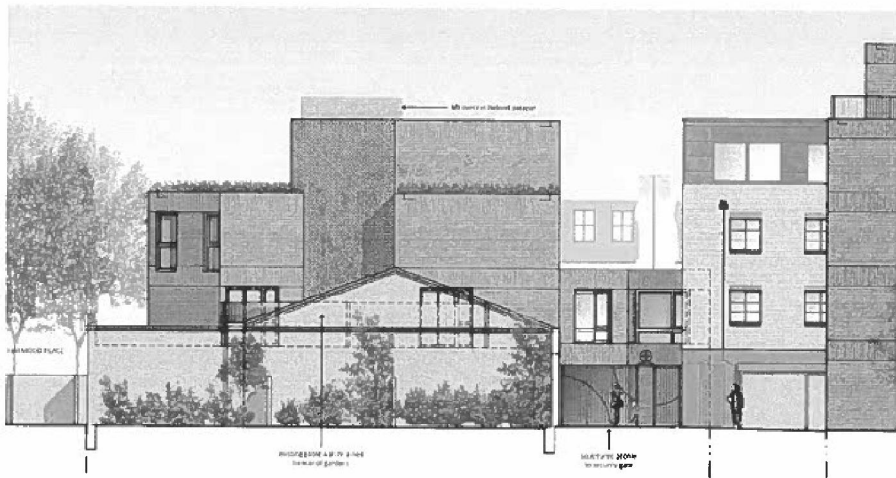


View looking west toward Site B

By way of contrast and context we highlight the scale of the proposed new buildings that would replace these existing structures.



Proposed section extract showing the significant additional bulk proposed by the replacement buildings on Site A and Site B and so loss of outlook and 'sky' above the buildings.



**Proposed elevation that would be viewed from the rear of Nos 4 - 6**

### **Specific Objections**

#### **Overbearing Impact**

As demonstrated above the existing building at Site A is single storey, and this will be replaced with a much taller 4 storey building. Although the design proposes stepping the highest parts of the building back away from Collard Place, it remains extremely close with the first and second floors set back only approximately 2.75 metres from the shared boundary and the fourth floor approximately 4 metres back. (The first floor balcony privacy screen will be approximately 0.2-0.25 metres from the boundary).

The proximity and height of the proposed building, coupled with the blank appearance of the elevation facing the rear of 4-6 Collard Place would result in an extremely oppressive and overbearing impact and a clear sense of enclosure being created.

Further the proposed new building on site B would be five storeys (replacing a two storey building) and would only stand 12 metres away to the west of 4-6 Collard Place and their rear gardens. Again an oppressive and overbearing impact is created.

In summary, the rear outlook from 4 – 6 would be significantly affected and there would be a detrimental sense of enclosure, particularly to the garden areas. These impacts would be harmful and un-neighbourly and result in a material reduction in the residential amenity enjoyed by the occupants of the properties.

#### **Daylight/Sunlight**

The Planning Statement accompanying the submissions makes reference to Daylight/Sunlight Reports prepared by GIA (see paragraph 6.50) and GVA Schatunowski Brooks (see paragraph 6.56).

The only report available from the council's website has been prepared by GVA.



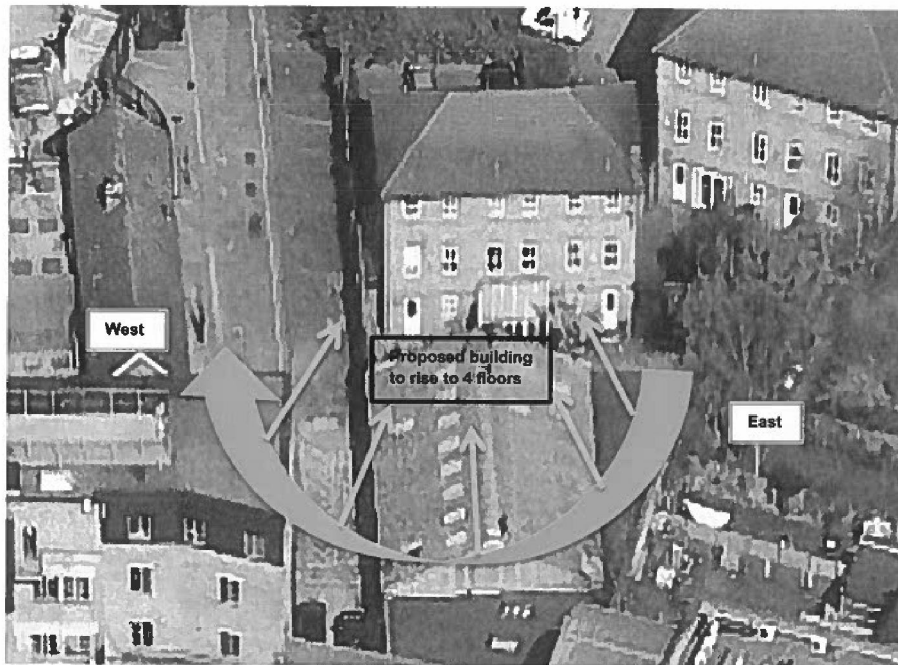
As will be noted, this identifies that the level of daylight 4-6 Collard Place receives is exceptionally high for an urban location (Vertical Sky Components-close to 40%), however following the erection of the proposals, the levels of daylight would be less than the BRE recommendation (VSC 27%).

It is suggested that these would be considered adequate for an urban environment, and that it is unlikely that occupants would notice a loss of light to windows.

This is a wholly illogical conclusion to draw i.e. levels of light are currently good, and these would drop below BRE standards but none the less it is suggested that the properties owners would not be impacted.

This is simply incorrect and it is clear that the applicants own report demonstrates that a harmful reduction in daylight would result from this development for the reasons discussed above (additional height and bulk in such proximity to the rear of Nos 4 – 6). This is contrary to Council policy.

Further to this, and as will be noted from the image below, it is clear that the erection of a four storey building standing directly south of 2-6 Collard Place would dramatically impact upon the direct sunlight received by these properties as well as general daylight. The sun rises in the east and moves round to the west as shown and so would sit behind and be blocked by the proposed new building. The loss direct sunlight and the shadowing created would again be clearly detrimental to the amenity currently enjoyed.



Aerial Photograph showing extent of overshadowing (Approximate)

The submitted sunlight and daylight report also shows significantly reduced levels of direct sunlight, particularly in the winter months.

Room use	Window Ref	Existing %			Proposed %			% Loss of Summer	% Loss of Winter	% Loss of Total
		Summer	Winter	Total	Summer	Winter	Total			
<b>4 COLLARD PLACE</b>										
<b>7th Floor</b>										
W1/10		45.00	14.00	59.00	42.00	3.00	46.00	6.67%	78.57%	23.73%
W2/10		44.00	14.00	58.00	36.00	5.00	41.00	18.18%	64.29%	29.31%
<b>1st Floor</b>										
W1/11		57.00	25.00	82.00	52.00	15.00	67.00	8.77%	40.00%	18.29%
W2/11		57.00	26.00	83.00	53.00	14.00	67.00	7.02%	46.15%	19.28%
<b>2nd Floor</b>										
W1/12		57.00	28.00	85.00	54.00	20.00	74.00	5.26%	28.57%	12.94%
W2/12		57.00	28.00	85.00	56.00	21.00	77.00	1.75%	25.00%	9.41%
W7/12		32.00	15.00	47.00	25.00	9.00	34.00	21.88%	40.00%	27.66%
<b>6 COLLARD PLACE</b>										
<b>9th Floor</b>										
W5/10		55.00	10.00	65.00	46.00	3.00	49.00	16.36%	70.00%	24.62%
W6/10		61.00	21.00	82.00	57.00	9.00	66.00	6.56%	57.14%	19.51%
<b>1st Floor</b>										
W3/11		57.00	27.00	84.00	54.00	14.00	68.00	5.26%	48.15%	19.05%
W4/11		57.00	27.00	84.00	56.00	15.00	71.00	1.75%	44.44%	15.48%
<b>2nd Floor</b>										
W3/12		57.00	27.00	84.00	54.00	21.00	77.00	1.75%	22.22%	8.33%
W4/12		57.00	27.00	84.00	56.00	22.00	78.00	1.75%	18.52%	7.14%
<b>4 COLLARD PLACE</b>										
<b>7th Floor</b>										
W3/10		39.00	16.00	55.00	39.00	7.00	46.00	0.00%	56.25%	16.36%
W4/10		52.00	20.00	72.00	52.00	10.00	62.00	0.00%	50.00%	13.89%
<b>1st Floor</b>										
W5/11		57.00	27.00	84.00	56.00	16.00	72.00	1.75%	40.74%	14.29%
W6/11		57.00	27.00	84.00	56.00	17.00	73.00	1.75%	37.04%	13.10%
<b>2nd Floor</b>										
W5/12		57.00	27.00	84.00	57.00	23.00	80.00	0.00%	14.81%	4.76%
W6/12		57.00	27.00	84.00	57.00	23.00	80.00	0.00%	14.81%	4.76%

As will be noted the report is clear that in the winter months a number of the rear windows on Collard Place will lose well over 50%, in some cases close to 80% of the sunlight currently enjoyed.

This is simply a fact that is obvious when considering the scale of built form proposed so close to the rear of these houses.

#### Privacy

As noted above, the first floor balcony of the proposed Site A building would be just 0.2-0.25 metres away from the shared boundary with Collard Place, whilst the distance between the proposed first floor glazed doors and the rear elevation of 4-6 Collard Place is just 11 metres.

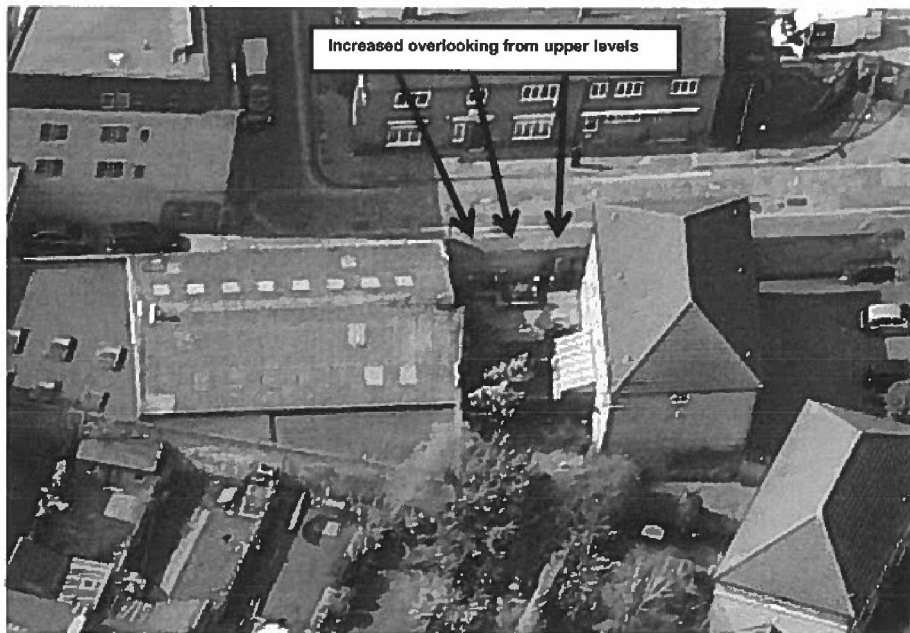
Although the balcony is to accommodate a 1.8 metre high privacy screen, the close proximity of the balcony and glazed doors to Collard Place would reduce the level of privacy afforded to the existing properties. This is particularly clear, given the recommended privacy distance set out in Camden Planning Guidance 6 of 18 metres between habitable rooms. It is understood that when the applicants carried out consultation with local residents it was suggested that there would be no general access to this area.

This is not however annotated on the plans which suggest access would be possible. A condition ensuring the area could not be used as a terrace would be required.

*p.p.s.*

Further the 2<sup>nd</sup> floor windows of nos. 4-6 Collard Place would also have the potential to overlook the balcony of the proposal, and therefore reduce the enjoyment of this space for potential future occupiers of the development.

It is also noted, that the front elevation of the proposed building at Site B, accommodates many windows at all floor levels, including third and fourth floor levels at just 12 metres to the west of 4-6 Collard Place. As can be seen from the photograph below, the building at Site B would directly overlook the rear of the gardens at Nos 4 – 6. Whilst there is a limited degree of overlooking from the existing first floor the level of overlooking would dramatically increase as would the sense and perception of being overlooked for residents when using their private garden areas. .



Aerial photograph demonstrating addition overlooking from proposed site B

#### Ventilation

The lower ground, ground and first floor plans show a large 'vent' positioned in the north east corner of Site A close to the boundary with No. 4 Collard Place. This is not shown in elevation so it is assumed that it sits on the flat section of roof at first floor level.

It is unclear as to whether this is simply a void allowing air to escape from the lower ground garage area or whether there would be a mechanical ventilation system either drawing air in or releasing it.

We have concerns in this regard regarding the potential for noise impacts i.e. a mechanical exhaust or intake so close to the boundary of 4 Collard Place.

The specification of this vent should, we suggest, be clarified and a noise report provided if mechanical ventilation is proposed.

We also raise concerns regarding the quality of air which will be released (if it is an exhaust or car park vent) in close proximity to a residential garden. This appears to have been ignored in the application submission.

#### Surface Water Drainage

Paragraphs 2.4 and 3 of the Basement Impact Assessment identify that the site is an area of 'High Surface Water Flooding' however paragraph 7.11 of the Drainage Strategy Report states that there is only a "...small level of risk from surface water flooding".

There do not appear to be any clear explanation as to how these differing conclusions have been reached. It also raises the concern that this technical issue may not have been properly considered and addressed in the preparation of the submission.

#### Affordable Housing

Paragraphs 6.106-6.111 of the Planning Statement discuss affordable housing provision and propose the making of a financial contribution in lieu of on-site delivery.

There appears to be no justification to explain why on-site provision would be inappropriate in respect of the development and the statement appears to reference the proposal relating to the delivery of a single dwelling house as opposed to 19 dwellings.

The inaccuracy of this comment raises uncertainty regarding what is actually proposed in respect of this matter.

#### Other Areas of Concern

A number of inconsistencies and issues have been noted in the review of available information supporting the application submission. This raises very serious concerns regarding the confidence which can be held in regards to the accuracy of their conclusions.

It is noted that the following plans do not appear to scale correctly:

- PL003 Existing Elevation SW
- PL004 Existing Elevation NE
- PL010 Existing Ground Floor Plan
- PL011 Existing First Floor Plan
- PL099 Proposed Lower Ground Floor Plan
- PL100 Proposed Ground Floor Plan
- PL101 Proposed First Floor Plan
- PL102 Proposed Second Floor Plan
- PL103 Proposed Third Floor Plan
- PL104 Proposed Fourth Floor Plan
- PL105 Proposed Fifth Floor Plan
- PL200 Proposed Section AA & XX
- PL201 Proposed Section BB & YY
- PL313 Proposed Elevation S5 and W6
- PL314 Proposed Elevation N7

Section XX on plan PL200 also appears to show 'built form' at first floor level adjoining the boundary with Collard Place. This appears inconsistent with all other drawings, as it is understood that there is a balcony proposed in this location.

In regards to inconsistent documents, it is noted that the plans and internal layouts assessed by various reports (e.g. see Energy Statement and Transport Statement) are inconsistent with the proposed drawings.

Space Standards

The inaccurate scaling of the plans, makes it extremely difficult to assess and corroborate the applicants' claim that the proposed flats are in accordance with internal and external space standards.

Overall Summary & Conclusion

As has been clearly demonstrated in this letter, but also as will be readily apparent from any visit to the site the proposals which are the subject of this application would result in clear and dramatic adverse impacts upon the residents of Nos 4 – 6 Collard Place by virtue of their overbearing, oppressive and enclosing nature as well as the unacceptable losses of daylight, sunlight and privacy that would result. The impacts on winter sunlight are particularly severe.

There are a number of inconsistencies within the application package and key information is not provided which makes it difficult to properly assess the application fully. (For example no existing sections are provided to compare with the proposed)

However based upon the information available it is clear that there would be significant adverse impacts and so Officers are requested to refuse planning permission in this case.

The residents at Nos 4 – 6 would be happy to provide access to their rear garden areas should you feel that this would be beneficial to you in determining the application.

Yours Sincerely,



Paul Watson  
PHILLIPS PLANNING SERVICES LTD

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*p.p.s.*