



Phillips Planning Services Ltd.

Town Planning and Development Consultants

Our Ref: P164917

16th January 2017

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

Dear Mr Tulloch,

Revised Plans-Planning Application 2016/2457/P at 1-3 and 4, 6, and 8 Ferdinand Place, London

Thank you for your letter dated 5th January 2017 providing the opportunity to comment upon revised plans submitted in respect of planning application 2016/2457/P at 1-3 and 4, 6 and 8 Ferdinand Place, London

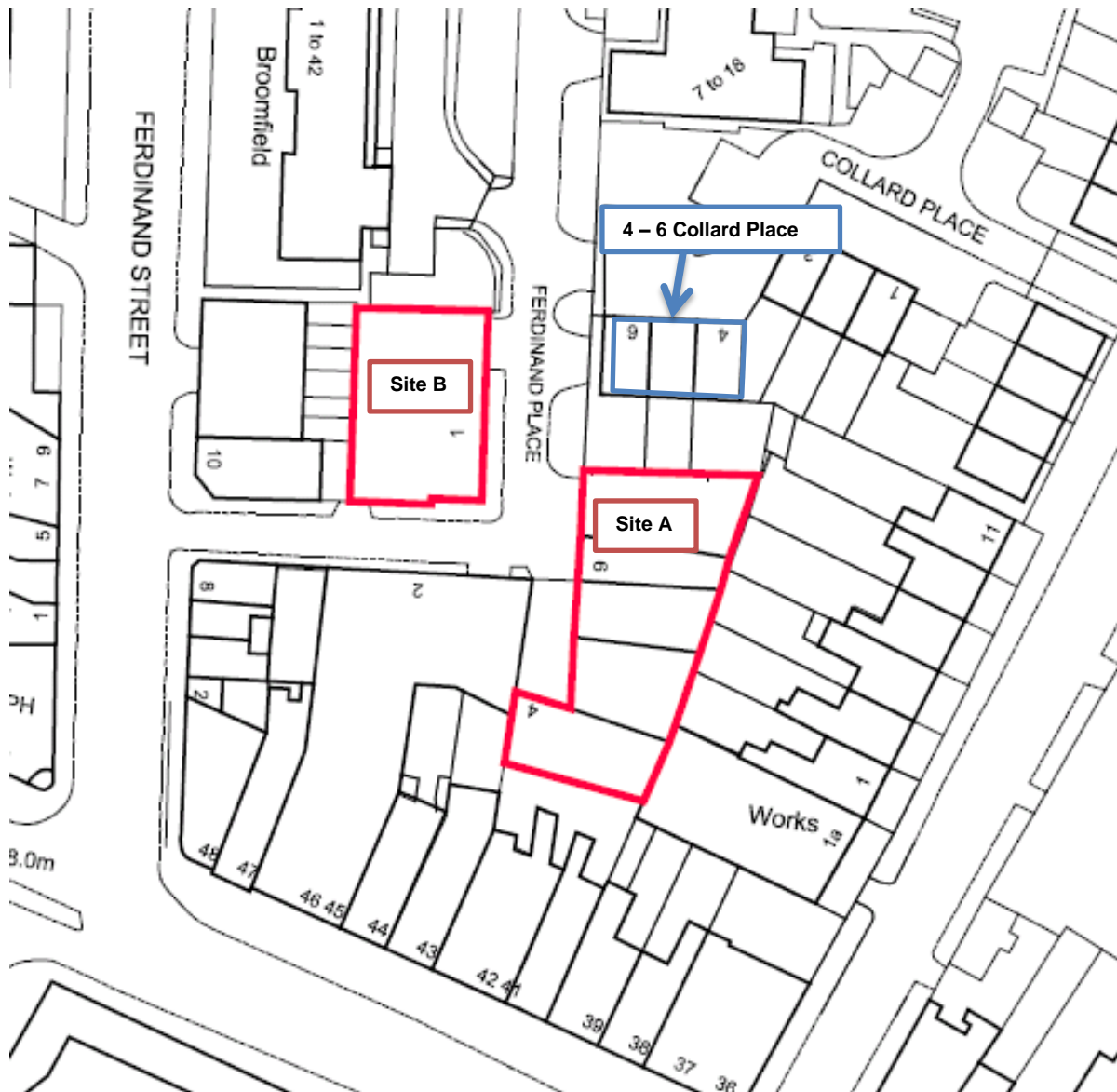
We have reviewed these plans with our client, Mr G Parker-Whitten of no. 4 Collard Place, London and continue to hold significant concerns with the proposals. Although it is noted the 'Site B' has been reduced by a storey (it is also noted that there appear to be no changes to 'Site A' in respect of its impact on our client's property), it is considered the revisions do not address the issues and impacts we have previously identified.

We therefore continue to object to the application and reiterate the harmful impacts which the development would have upon our client's property (in the context of the revised plans) as follows:

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 meaning that the windows on the southern elevation (which serve habitable rooms) and the rear gardens adjoin and look directly out onto 'Site A' (4-8 Ferdinand Place), whilst the side elevation of the terrace faces 'Site B' The side of No. 6 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 first 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



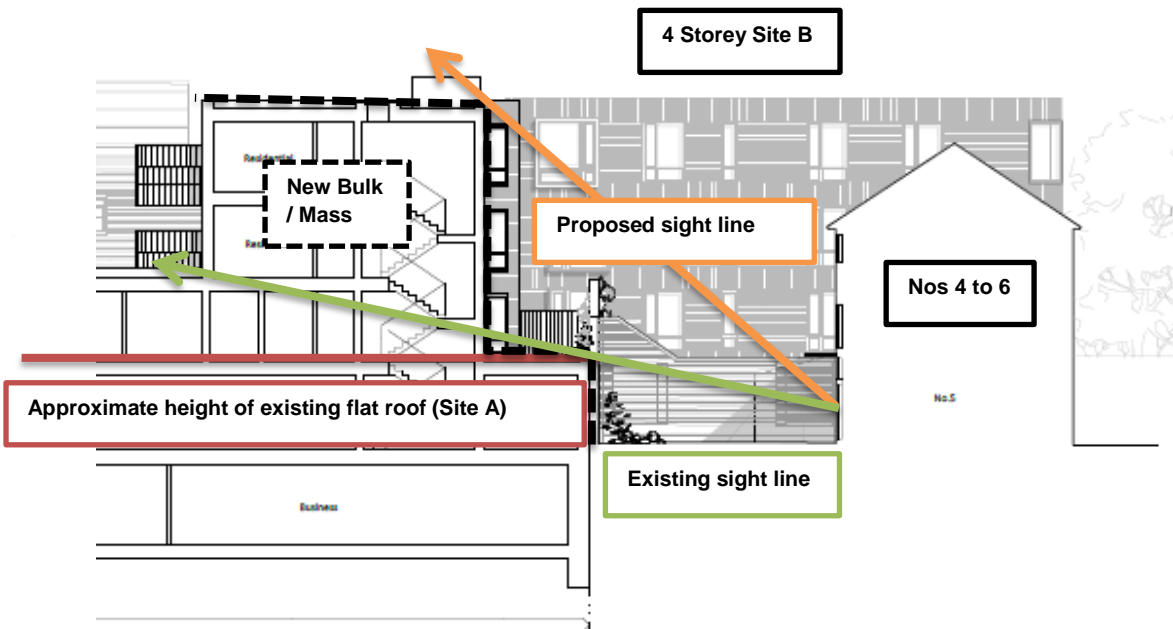
View showing the pitched section of the building behind Nos 5 and 6 Collard Place

The existing building on 'Site B' is of two storey scale where 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 buildings (as revised) that would replace these existing structures.



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.



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.

The revised proposal for the building on site B now has four storeys instead of five (and will replace a building with only two storeys). As with original submission, the proposed building will only stand 12 metres away to the west of 4-6 Collard Place and their rear gardens. Although a reduction in one storey is an improvement on the previously proposed five storeys, it is still considered that the close proximity of the building to our Collard Place will result in an oppressive and overbearing impact being 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

It is noted that the revised plans are accompanied by a revised 'Daylight/Sunlight Report' prepared by GVA Schatunowski Brooks dated November 2016.

Although the revised report contains no analysis, it is clear from comparing the daylight/sunlight figures to the original report that the revised proposals do little to improve the detrimental impact which they would cause.

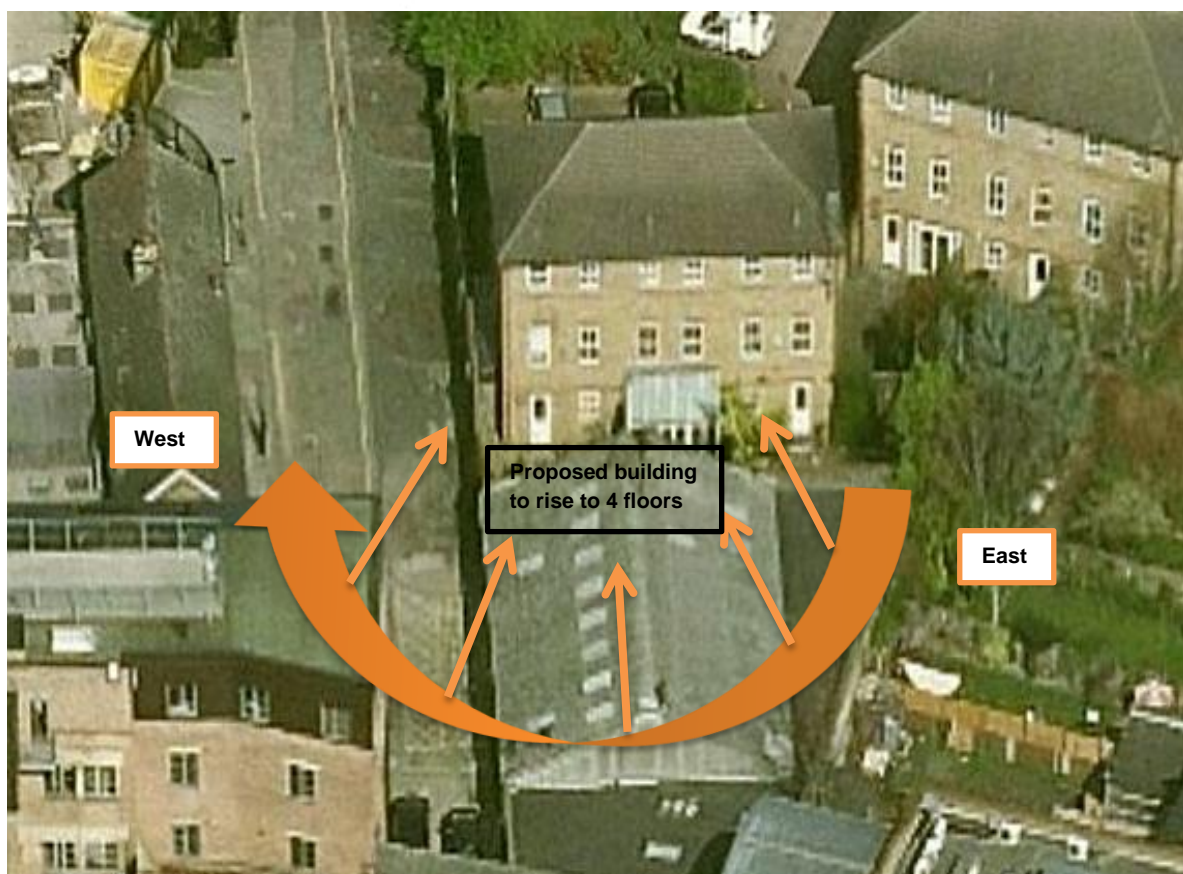
As previously highlighted, the level of daylight 4-6 Collard Place receives is exceptionally high for an urban location (Vertical Sky Components-close to 40%), and the erection of the revised proposals, would continue to result in the levels of daylight less than the BRE recommendation (VSC 27%).

The original Daylight/Sunlight report 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.

We do however consider this to be 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.

As will be noted, the revised figures demonstrate that a harmful reduction in daylight would result from this development and this is contrary to Council policy.

Furthermore, it is clear that the erection of a four storey building standing directly south of 4-6 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 below 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)

As can be seen below, the loss of sunlight identified in the reports, particularly during the winter months is substantial, and the revised proposal has not made the development acceptable:

Original Daylight/Sunlight Report-April 2016

Room use	Window Ref	Existing %			Proposed %			% Loss of Summer	% Loss of Winter	% Loss of Total
		Summer	Winter	Total	Summer	Winter	Total			
6 COLLARD PLACE										
9th Floor										
W1/10		45.00	14.00	59.00	42.00	3.00	45.00	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%
1st Floor										
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%
2nd Floor										
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%
5 COLLARD PLACE										
9th Floor										
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%
1st Floor										
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%
2nd Floor										
W3/12		57.00	27.00	84.00	56.00	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%
4 COLLARD PLACE										
9th Floor										
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%
1st Floor										
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%
2nd Floor										
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%

Revised Daylight/Sunlight Report-November 2016

Room use	Window Ref	Existing %			Proposed %			% Loss of Summer	% Loss of Winter	% Loss of Total
		Summer	Winter	Total	Summer	Winter	Total			
6 COLLARD PLACE - BRE105										
9th Floor										
UNKNOWN	W1/10	45.00	14.00	59.00	42.00	3.00	45.00	6.67%	78.57%	23.73%
UNKNOWN	W2/10	44.00	14.00	58.00	37.00	5.00	42.00	15.91%	64.29%	27.59%
1st Floor										
UNKNOWN	W1/10	57.00	25.00	82.00	54.00	15.00	69.00	5.26%	40.00%	15.85%
UNKNOWN	W2/10	57.00	26.00	83.00	56.00	14.00	70.00	1.75%	46.15%	15.66%
2nd Floor										
UNKNOWN	W1/12	57.00	28.00	85.00	56.00	20.00	76.00	1.75%	28.57%	10.59%
UNKNOWN	W2/12	57.00	28.00	85.00	57.00	21.00	78.00	0.00%	25.00%	8.24%
UNKNOWN	W7/12	32.00	15.00	47.00	28.00	11.00	39.00	12.50%	26.67%	17.02%
5 COLLARD PLACE - BRE105										
9th Floor										
UNKNOWN	W5/10	55.00	10.00	65.00	47.00	3.00	50.00	14.55%	70.00%	23.08%
UNKNOWN	W6/10	61.00	21.00	82.00	60.00	9.00	69.00	1.64%	57.14%	15.85%
1st Floor										
UNKNOWN	W3/11	57.00	27.00	84.00	56.00	14.00	70.00	1.75%	48.15%	16.67%
UNKNOWN	W4/11	57.00	27.00	84.00	56.00	15.00	71.00	1.75%	44.44%	15.48%
2nd Floor										
UNKNOWN	W3/12	57.00	27.00	84.00	57.00	21.00	78.00	0.00%	22.22%	7.14%
UNKNOWN	W4/12	57.00	27.00	84.00	57.00	22.00	79.00	0.00%	18.52%	5.95%
4 COLLARD PLACE - BRE105										
9th Floor										
UNKNOWN	W3/10	39.00	16.00	55.00	39.00	7.00	46.00	0.00%	56.25%	16.36%
UNKNOWN	W4/10	52.00	20.00	72.00	52.00	10.00	62.00	0.00%	50.00%	13.89%
1st Floor										
UNKNOWN	W5/11	57.00	27.00	84.00	57.00	16.00	73.00	0.00%	40.74%	13.10%
UNKNOWN	W6/11	57.00	27.00	84.00	57.00	17.00	74.00	0.00%	37.04%	11.90%
2nd Floor										
UNKNOWN	W5/12	57.00	27.00	84.00	57.00	24.00	81.00	0.00%	11.11%	3.57%
UNKNOWN	W6/12	57.00	27.00	84.00	57.00	24.00	81.00	0.00%	11.11%	3.57%

It is particularly noticeable that it continues to be the case that within the winter months a number of the rear windows on Collard Place will lose well over 50%, and in some cases lose 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 and cannot be found acceptable.

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.

Further the 2nd 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.

In regards to the proposed building at 'Site B', although this has been reduced by one storey and there is a very minor alteration to the fenestration to the top floor, there are numerous windows across the entirety of its front elevation, just 12 metres to the west of 4-6 Collard Place, and directly overlooking their rear gardens.

Whilst there is a limited degree of overlooking from the existing first floor of the building on 'Site B', the level of overlooking would dramatically increase as would the sense and perception of being overlooked for residents when using their private garden areas from this much larger and taller building.



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.

As no additional information appears to have been submitted with the revised plans, we continue to hold 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 again 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.

Surface Water Drainage

We previously highlighted that the Basement Impact Assessment and Drainage Strategy Report contradicted one another in their assessment of the risk from surface water flooding.

It is noted that a revised Drainage Strategy has been submitted, which concludes that the development is unlikely to be at risk from surface water flooding.

We are however unaware of a revision to the Basement Impact Assessment, so we wish to highlight that these documents continue to be in contradiction on this matter.

Affordable Housing

We also previously highlighted that the application submission proposes the making of a financial contribution in lieu of on-site delivery of affordable housing.

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

This issue appears to not have been addressed in the submission of revised documentation and plans.

Other Areas of Concern

As with the original submission, it also noted that a number of the revised drawings have also been incorrectly prepared and fail to scale in accordance with their labelling:

- PL099 Rev A Proposed Lower Ground Floor Plan
- PL100 Rev C Proposed Ground Floor Plan
- PL101 Rev C Proposed First Floor Plan
- PL102 Rev C Proposed Second Floor Plan
- PL103 Rev C Proposed Third Floor Plan
- PL104 Rev C Proposed Fourth Floor Plan
- PL105 Rev C Proposed Fifth Floor Plan
- PL200 Rev C Proposed Section AA & XX
- PL201 Rev C Proposed Section BB & YY
- PL313 Rev C Proposed Elevation S5 and W6

For completeness, we also highlight that the following plans which have not been revised (but still form part of the application package) similar do not scale correctly:

- PL003 Existing Elevation SW
- PL004 Existing Elevation NE
- PL010 Existing Ground Floor Plan
- PL011 Existing First Floor Plan
- PL314 Proposed Elevation N7

Further to this issue, we reiterate that there are a number of inconsistencies to be found in the supporting documentation which has not been addressed in the revision, such as the Energy Statement and Transport Assessment utilising plans and layouts inconsistent with the proposed drawings.

Space Standards

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

Overall Summary & Conclusion

As has been demonstrated in this letter, the revised proposals do little to nothing to address the harm which the proposed development at 1-3, 4, 6 and 8 Ferdinand Place will have upon the residents of Nos 4 – 6 Collard Place.

In regards to this, the proposal continues to have an overbearing, oppressive and enclosing nature and would also result in unacceptable losses of daylight, sunlight and privacy. The impacts on winter sunlight also continues to be particularly severe as indicated by the applicants own submission.

Furthermore, it is again highlighted there remain a number of inconsistencies and inaccuracies within the overall submission.

We trust that all of these comments will be considered in your assessment of the application, and we continue to respectfully request that officers refuse planning permission for this development.

Please do not hesitate to contact us should you wish to discuss further or require clarification on any of the issues raised.

Yours Sincerely,

Paul Watson
PHILLIPS PLANNING SERVICES LTD