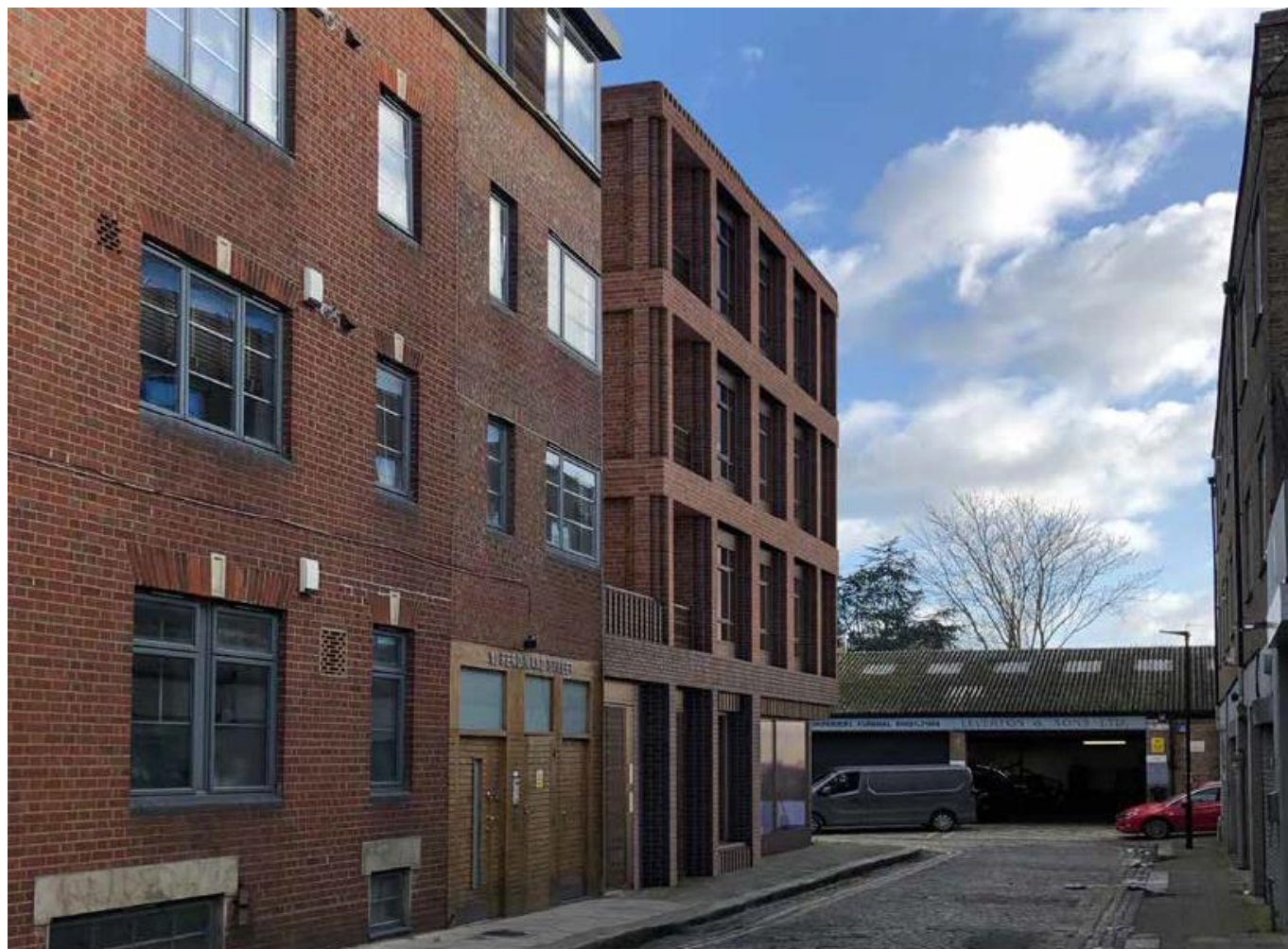

Planning Statement

1-3 Ferdinand Place, Chalk Farm, London NW1 8EE



Planning Statement

1, 3 Ferdinand Place, Chalk Farm, London NW1 8EE



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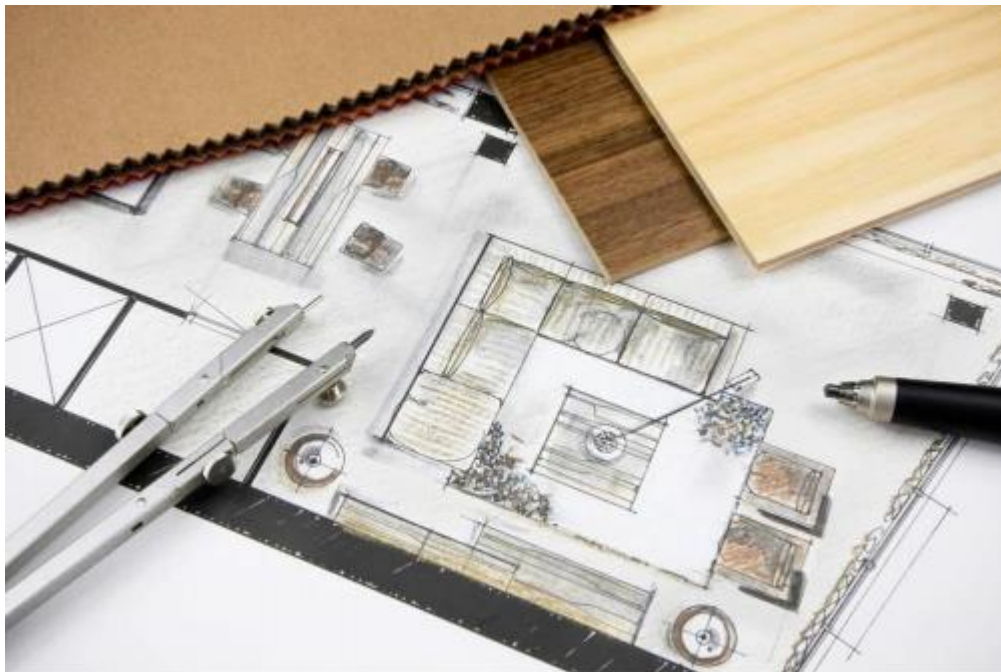
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1. Introduction

This document has been prepared by Savills, on behalf of Luxgrove Capital Partners ('Luxgrove Homes' or 'the Applicant') to accompany a full planning application made to Camden Council ('The Council') in support of scheme proposals that require planning permission at no.1, 3 Ferdinand Place, Chalk Farm, London NW1 8EE.

The application proposes the demolition of the existing building and the erection of a four storey building plus roof level accommodation and roof terrace comprised of office use (Class B1(a)) at ground floor level and 9 self-contained residential units (Class C3) on the upper floors with associated plant, cycle parking and refuse storage.

Luxgrove Homes are a UK-based development company with the aim of creating unique and modern homes. Their approach is that whether creating homes as new build or conversion developments, a common denominator is the focus and attention to architecture, design and innovative thinking and to be able to offer services that make everyday life more convenient for residents.



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1.1. Structure of Report

In this Planning Statement we describe the site, set out the planning history, provide planning context and define and assess the application proposals. This Planning Statement takes the following format:

Section 2 – Site Description and Context

Section 3 – Pre-application discussions

Section 4 – Planning Context

Section 5 – Planning Assessment

Section 6 – Summary & Conclusions



Figure 1- CGI image of the proposal from Ferdinand Place

2. Site Description and Context

The application site is located within the London Borough of Camden. The site sits on a corner plot within Ferdinand Place. The site comprises a part one/two storey building which provides administrative and operational support to an existing funeral directors business (Leverton and Sons Ltd) as well as a separate self-contained flat. The property is not located in a conservation area, albeit abuts and sits within the wider context of Harwood Street Conservation Area to the west. The site is not a statutorily or locally listed building, however the Ferdinand Place granite setted carriageway is Locally Listed.



Figure 2- Aerial View of the application site, outlined in yellow (Source : Google Maps 2020)

The site is within a few minutes' walk of both Chalk Farm and Camden Town Underground stations and Camden Road and Kentish Town West Overground stations. Numerous buses also pass along Chalk Farm Road, resulting in an excellent public transport accessibility rating (PTAL 6a).

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2.1. Site Context

The immediate surrounding area is predominantly residential, however there are commercial uses on the ground floors of some buildings. Ferdinand Place is a cul-de-sac off Ferdinand Street, and mainly comprises residential properties. No.2 Ferdinand Place is a three storey block directly to the south of the site. It was formerly in office use, but was converted to 8x flats. To the west of the site at nos. 10 and 12 Ferdinand Street are two four storey blocks of flats, while to the north is a six storey housing block known as Broomfield House. To the east of the site across Ferdinand Place lies a three storey residential apartment block and a single storey warehouse building which is occupied by an existing funeral directors business (Leverton and Sons Ltd).



Figure 3 - Streetview images of 2 Ferdinand Place and 10 and 12 Ferdinand Street (Source: Google Maps 2020)

Leverton and Sons Ltd were the original owners of the application site, and are a long-established funeral directors serving the local area. The business has been established in Camden for more than 200 years, serving the needs of the local community at very sensitive times for all families.

Savills Planning team previously have acted on behalf of Leverton and Sons Ltd in respect of this site (1-3 Ferdinand Place) and an adjoining site at 4,6 & 8 Ferdinand Place. Planning permission was secured (Ref: 2016/2457/P) over the two sites (referred to as 'Site A' and 'Site B') in 2018 for the Demolition of existing buildings and erection of two new four storey plus basement buildings to provide replacement funeral directory facility at ground and basement levels of 4-8 Ferdinand Place and provision of 19x residential units (6 x 1- bed, 8 x 2-bed and 5 x 3-bed units), split across both sites.

Our client has acquired nos. 1, 3 from previous landowner (Leverton & Sons Ltd) as the approved scheme (above) is now not being implemented as it is fundamentally unviable and not capable of being delivered. The intention had been to raise funds via the development of the land to implement the consent, however following tender for the construction they realised that the consent was not viable. The landowner therefore decided to sell nos. 1,3 Ferdinand Place to our client. This sale of the property was required to ensure Leverton and Sons Ltd could raise funds and continue to operate at no 4,6,8 Ferdinand Place.

3. Planning Context

3.1. Planning History

A planning history search has been undertaken on the Council's website, and the following planning permissions were considered relevant:

1, 3 Ferdinand Place

- **H10/6/D/27886:** The use of one room on the ground floor and one room on the first floor as offices. Granted 14/03/1979
- **H10/6/D/32105:** The continued use for storage and embalming on part of the ground floor and residential on part of the first floor. Granted 26/06/1981

1, 3 and 4, 6 and 8 Ferdinand Place

- **2016/2457/P:** Demolition of existing buildings and erection of two new four storey plus basement buildings to provide replacement funeral directory facility at ground and basement levels of 4-8 Ferdinand Place and provision of 19x residential units (6 x 1-bed, 8 x 2-bed and 5 x 3-bed units), split across both sites. Granted Subject to a Section 106 Legal Agreement 14/12/2018

3.2. Planning Policy

The planning policy context is provided by national, strategic and local planning policies. Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 requires that if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

In assessing and determining development proposals, the National Planning Policy Framework 2019 (NPPF) states that local planning authorities should apply a presumption in favour of sustainable development. **Paragraph 11** states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Paragraph 59 states that To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

Paragraph 80 outlines that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Paragraph 117 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Paragraph 118 (d) seeks to promote support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively

The Development Plan

The Development Plan comprises the London Plan (2016) as amended, Camden Local Plan (2017) which includes both Policies Map and Site Allocations Plan, and Euston and Fitzrovia Area Plans.

There are no specific planning policy designations which relate specifically to the site.

A draft 'Intend to Publish' version of the new London Plan was published in 2020. Following 'Examination in Public' between Jan-May 2019, the Panel of Inspectors appointed by the Secretary of State issued their report and 55 recommendations. In response, on 9 December 2020, the Mayor issued the revised 'Intend to Publish' version of the London Plan to the Secretary of State, reducing the plan's ten-year housing target by almost 20% from 649,350 to 522,850, and more than halving the Plan's target for small sites, from 245,730 to 119,250.

In a letter dated 13 March 2020, the Secretary of State directed the Mayor to work constructively with London boroughs to encourage more housing delivery and to make several modifications to the new London Plan to bring it in line with the NPPF.

Under the GLA Act 1999, the Plan has to be approved by the Secretary of State before it can be adopted. At present, pending the Mayor's response, it is unclear when/if the plan will be adopted. However, given the advanced stage of its preparation, the draft new London Plan is considered to hold significant weight in the determination of planning applications.

All of the relevant policies are thoroughly assessed within the Planning Assessment section of this report.

4. Pre-application Advice & Discussions

In accordance with paragraph 39 of the NPPF, the proposals have been progressed through pre-application discussions and engagement with the Council (2019/6087/PRE). A pre-application meeting was held with planning officer, Kate Henry, on site on 15 January 2020. A formal pre-application advice letter was issued on 11 February 2020.

The meeting and discussions have been constructive with the principle of development being considered acceptable and the majority of the discussions focussing on the detailed design of the new development on the site. The scheme proposals have been revised in light of discussions with Officers, and we have summarised some of the key scheme details that have been informed by pre-application discussions below:

- Retention of 9 residential units on the upper floors and commercial office unit on the ground floor;
- Omission of the basement to be included within the commercial floorspace;
- Revisions to architectural design and materiality to respond to the local character and context;
- Omission of terraces on the eastern elevation;
- Submission of Air Quality, Daylight & Sunlight, Noise, Energy and Sustainability and Contamination Assessments; and
- Transportation technical advice, specifically in relation to draft Construction Management Plan.

5. Planning Assessment

The scheme proposals have been designed, progressed, and developed with the utmost care and attention to detail in respect of the surrounding area's context – and in this section, we assess the merits of the application proposal.

The scheme proposals seek to make efficient use of this site to provide a genuinely high quality mixed use residential scheme to meet an overwhelming housing need in London, particularly for family housing. The scheme is characterised by high quality design that has been informed by the site's character and its surroundings, as well as across matters such as amenity, proximity to trees, and transport accessibility.

5.1. Principle of Development

Planning policy at national and local level seeks to support and encourage the effective use of brownfield land and sites in urban sustainably located areas. The planning application proposals are firmly in accordance with these policies, by seeking to demolish and replace an existing underutilised building, on site, to provide a mix of uses, all of which are considered to be appropriate in this sustainable location in close proximity to the town centre.

5.2. Land Uses

As already noted, the existing use of the site comprises operational support to an existing funeral directors business (Leverton and Sons Ltd), whose main functional business space (nos. 4,6 and 8) is located opposite to the west of the site on Ferdinand Place.

A letter has been provided by Leverton and Sons Ltd (**Appendix 1**), which states that 1,3 Ferdinand Place has become surplus to requirements for their business, and is mostly used to a low-level of intensity for storage and car parking since 2017. The residential flat at floor level was last occupied on 16 July 2016, and shares a communal entrance lobby with the funeral directors use. The business has also confirmed that the recent usage of no. 1, 3 is now being accommodated within nos. 4, 6 and 8, and the disposal and redevelopment of nos. 1, 3 will not in itself restrict or hinder their continued operations in the Borough of Camden.

The site was part of a previously approved scheme (Ref: 2016/2457/P), and effectively would have provided 12 residential dwellings. As already noted, following the grant of planning permission the previous owners found that the scheme was unviable to develop.

With the above in mind, it is considered that the site in its current usage is underutilised, and a redevelopment scheme would provide an uplift to the sites activity whilst also ensure a high quality design for the future occupants of the building.

Use Class B1 Office Use

Local Plan Policy E2 encourages the provision of employment premises and sites in the borough, and protects premises or sites that are suitable for continued business use. Local Plan Policy E1 seeks to in part maintain a stock of premises that are suitable for a variety of business activities, for firms of differing sizes, and available on a range of terms and conditions.

London Plan Policy 4.2 encourages renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility. Draft Policy E1 concerns improving the quality, flexibility and adaptability of office space of different sizes, whilst also supporting new office provision.

The proposed redevelopment of the brownfield seeks to re-provide new employment accommodation on the ground floor level (179 sq.m), which is considered to be acceptable and compatible with the surrounding context. The previous application sought to re-provide this use within 4-8 Ferdinand Road, however this scheme is now unviable.

The replacement of site user specific operational accommodation on this site (Sui Generis) with new flexible office accommodation (Class B1a) is considered to be a logical and acceptable approach to replacing the employment generation of the existing site. The accommodation, which is open-plan and modern, with active ground floor frontages, will be well-suited to start-ups and SMEs, as well as support the local economy, as supported by Local Plan Policy E2.

Use Class C3 Residential Use

Policy H1 aims to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31. While Policy H2 states that where non-residential development is proposed, the Council will promote the inclusion of self-contained housing as part of the mix.

Increasing the current housing stock is an important strategic objective supported by London Plan policies 3.3 and 3.4 which aim to ensure that development proposals achieve the maximum intensity of use compatible with local context. While Policy H1 of the Camden Local Plan sets a strategic housing target for the borough. It states that Camden aims to exceed a target of 16,800 additional homes from 2016/17 - 2030/31. The draft London Plan (draft Policy H1) identifies a 10-year housing target of 10,860 for Camden between 2019/20 - 2029/29. This has increased when reviewed against Camden's current adopted London Plan target of 8,892 (adopted Policy 3.3).

London Plan Draft Policy H2 also provides Camden with a ten-year housing target of 3,760 net completions on small sites (below 0.25 ha. in size). Furthermore, it should be noted that the draft Policy H2 states that small sites should play a greater role in housing delivery and boroughs should pre-actively support well-designed new homes on small sites.

Whilst it is noted that this scheme will have 3 less residential dwellings than the previous planning permission (Ref: 2016/2457/P), as already stated, this scheme has now become unviable to develop. It is therefore considered that our client has sought to develop a scheme that will provide 9 high-quality residential properties on a site where an existing permission would most likely not be built.

Affordable Housing

Policy H4 seeks to maximise the supply of affordable housing in the borough. The policy expects a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more. Criterion G of the policy states that where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing. The affordable housing contribution for this scheme is set out in Section 6 (Planning Conditions and Obligations) of this report.

The Council have noted that there is text within Policy H4 that relates to the previous permission's (Ref: 2016/2457/P) affordable housing contribution. The text states that where development sites are split or separate proposals are brought forward for closely related sites, the appropriate affordable housing contribution should be comprehensively assessed for all the sites together. As demonstrated by the letter from the previous owner (Leverson and Sons) in **Appendix 1**, the two sites which comprised the previous permission are no longer under their ownership. 'Site B' which forms this application is now in our clients ownership, and therefore, the link between the sites has been broken. The sites can no longer be reasonably be considered closely related given they are held in separate ownerships. Therefore, it is appropriate and reasonable that the site contributes towards affordable housing under Policy H4.

Overall, the proposal to demolish and replace the existing building to provide a mix of office and residential floorspace is considered to be acceptable, and in accordance with Local Plan Policies H1, H2, H4 E1 and E2, London Plan Policies 3.3 and 3.4, draft London Plan Policies E1, H1 and H2 and the NPPF.

5.3. Density

The scheme proposes an appropriate density of development, particularly given the site's highly sustainable location. In respect of the London Plan calculations of density, as per the London Plan's Sustainable Residential Quality Density Matrix (SQR) (set out in Policy 3.4 of the London), the Plan states that density calculations should not be applied mechanistically (Paragraph 3.28). Nevertheless, the scheme designer has sought to keep the density of development within the density ranges prescribed by the SQR.

Paragraph 3.29 of the London Plan provides clear support for higher density schemes stating that higher density provision for smaller households should be focused on areas with good public transport accessibility. The scheme proposals are in line with this policy guidance. In more detail, looking at the SQR matrix in the London Plan, whilst the site comfortably meets the criteria to be located within the 'urban' area, we consider that it more appropriately falls into the 'central' area. The site is located within 800m walking distance of the Camden Town Major Town Centre, and would be described as a dense area, with a mix of different uses, includes some large building footprints with four to six storeys.

On this basis, we've set out the density calculations for the scheme below, using the central range. For completeness, the site area is 0.031 ha. and the building will comprise 9 units with 27 habitable rooms. The site has a PTAL rating of 6. Therefore, in compliance with the central standards of 650-1100 hr/ha or 215-405u/ha, the scheme proposes a density of 871 hr/ha or 290 u/ha.

In our view, the scheme complies with adopted planning policy 3.4 on density. Moreover, the scheme seeks to make effective use of a sustainable site to improve density and housing delivery. This is also supported by the draft new London Plan, which seeks to abolish density calculations for minor developments. The application site is clearly one where density can be improved to better meet the housing needs of London, as supported by the Mayor's draft new London Plan.

5.4. Design, Scale and Massing

The scheme architects have approached the scheme proposals with creativity and innovation, albeit also with care and attention to ensure the proposals embrace and celebrate the architectural quality, character and appearance of the surrounding area. A Design & Access Statement has been prepared by Cove Burgess Architects and sets out the overall design approach of the proposed development.

Policy D1 will seek to secure high quality design in development, whilst Policy D2 will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas.

The site is located on the corner of the Ferdinand Place cul-de-sac, and surrounded by residential buildings of a similar height to the south, east and north. To the west of the site lies three-storey residential blocks and the single storey Leverton & Sons Funeral Directors garage. Given that the garage site has had a recently approved planning application (Ref: 2016/2457/P), it is considered reasonable to assume that it will be subject to redevelopment or extension in the mid to long-term future. The character of Ferdinand Place and the immediate environs is considered to be predominantly residential apartment blocks, with independent small employment uses.

The design work has been informed by the site's shape, size, location and context in this part of Camden. The overall scale and massing is effectively same as that consented by application (Ref: 2016/2457/P), which is a material consideration.

The layout of the scheme centres around the splitting of the commercial office use at ground floor and the upper floors residential use. The commercial office unit will be located on the ground floor of the building, and have its entrance on the south east corner. This entrance will be recessed to provide an element of weather protection. The residential entrance will be accessed through a decorative iron gate to the south western corner of the site, which will also give access to a covered courtyard. The covered external courtyard will provide access for the residential units, and also include areas for cycle spaces and refuse (both commercial and residential).

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In respect of the scale and massing, the submitted proposal has been designed to present a contemporary scheme with a form and massing that respects its context. This approach ensures that the massing of the development sits in harmony with the neighbouring buildings on Ferdinand Place and adjacent properties on Collard Place. To achieve this, the scheme architect has sought to keep the building form to 4 storeys, with a parapet height 100mm lower than the extant consent, and a setback roof level with a terrace for the use of the family flat (Flat B7). This is consistent and appropriate given the height and massing of surrounding properties. The roof level storey is well set-back and designed to appear as a discreet roof structure, which is not visible from public vantage points along Ferdinand Place. Where glimpsed locally, it will be seen as a subordinate, albeit interesting, roof level structure, common across Central London. The design is crisp, refined and attractive. Furthermore, the accommodation and form are complimented and softened by the setting of sedum roofing and the landscaping around the perimeter of the terrace.

In respect of the buildings detail proposed, the scheme architect has created an appearance that in our opinion is more in-keeping with the character of the surroundings than the extant permission, and ensures that the building would have a more distinctive and solid design. In particular, the interesting brickwork detail and way the building is grounded with a commercial active frontage in physical materiality terms and in terms of overall character, is a significant improvement to the extant permission. In general, the proposed vertical proportions of the building's elevation produce a symmetrical and industrial appearance, which seeks to respond to the surrounding context, particularly the adjacent buildings at 10 Ferdinand Street and 2 Ferdinand Place. Furthermore, the texture and tones of brickwork respond positively to the local context and how the building is grounded.



Figure 4 – Illustrative image showing the ground floor brickwork

In more detail, the ground floor design has responded to the industrial character with the use of engineering brick and sturdy detailing (as shown above). The ground floor reflects the grid and structure of the building above, with large windows between sculpture brick piers. Between these piers brick 'stall risers' sit below the window cills, while the stepped pattern of brickwork adds depth and detail to the facade. The proposed balconies have also been carefully designed to ensure they sit with the overall form of the building, whilst also creating the appearance of an external room. This has been achieved by including a column on the external corner, giving a sense of privacy and retaining a strong rectangular form. Stepped brickwork has also been proposed on the corner pillar, which aims to help catch the sunlight and add depth to the facade. Decorative iron railings are proposed to match the entrance gate along the borders of the balconies.

The staircore and roof level accommodation will be clad in coloured aluminium, whilst the terrace will be paved, with built in edge planters and decorative railings defining the edges of the space. The remainder of the roof will include sedum roofing and photo-voltaics to ensure the building is as sustainable as possible.

In our opinion, this site presents a clear development opportunity for a scheme to positively improve the appearance, character and visual interest of this site, while providing much needed, high quality residential accommodation in the Borough. In this regard, in our view, the proposal is considered to be compliant with Local Plan Policies D2, D2, London Plan Policy 7.4 , draft London Plan Policy D3 and the NPPF.

5.5. Accommodation

The Design and Access Statement by CoveBurgess Architects provides a Schedule of Accommodation for the 9 residential units.

All of the new residential units have been designed to accord with the adopted London Plan, draft London Plan space standards and nationally prescribed standards set by the Government. The units have also all been designed with care and attention to ensure the scheme provides open-plan high quality accommodation. All of the units are dual aspect, and will benefit from good outlook, privacy, and internal daylight and sunlight levels. This is set out in the supporting Daylight and Sunlight Assessment by Schroeders Begg .

All the units will have access to a private useable balcony or terrace area, which will vary in size, depending on the location of the flat and the layout design. The largest 3 bedroom 4 person flat (Flat B7) will have access to a 31 sqm. private roof terrace. The roof terrace is well-screened and set-back from the building parapet to ensure there is no adverse amenity impacts.

Whilst all of the flats will have access to private amenity space, it should also be noted that the site sits in close proximity to a number of public open spaces, including Castlehaven Open Space (5 minutes' walk), Talacre Gardens (6 minutes' walk) and Primrose Hill (12 Minutes' Walk).

5.6. Daylight and Sunlight

A Daylight and Sunlight report has been prepared by Schroedersbegg and is submitted as part of this planning application. The report has ensured to capture the difference in daylight and sunlight between the extant permission (Ref:2016/2457/P) and the scheme proposals, which constitute relatively minor massing changes.

The report has utilised the BRE Publication “Site Layout Planning for Daylight & Sunlight – A guide to good practice” as the standard for review. This guide states that, in relation to such extant planning permission, in assessing the loss of light to existing windows nearby, a local authority may allow the vertical sky component (VSC) and annual probable sunlight hours (APSH) for the permitted scheme to be used as alternative benchmarks. Accordingly, the report has considered the ‘shift change’ from the consented (extant permission) to the proposal, considering VSC and sunlight. For completeness, the shift change to daylight distribution and sunlight to amenity has also been assessed.

The findings detailed in the report confirm any shift changes to daylight and sunlight are typically negligible; ranging 0% to 4%, there is one isolated instance to a bedroom at 2nd floor where we are indicating a shift change of 7% to daylight distribution, however the room still maintains greater than two-thirds of the room area as having the ability to receive daylight in the proposed scenario, thus we do not consider any adverse impact, and the BRE recognises bedrooms are less important in any event.

Accordingly, in respect of any changed impact to neighbouring properties, we conclude this is broadly negligible, and there are no meaningful reductions / additional harm from the latest proposal in terms of daylight and sunlight.

In addition to neighbour testing, we have also considered the layout changes for the main proposed new-build habitable rooms (self-test), our analysis confirms all rooms satisfy the target criteria in terms of provision of adequate daylight (Average Daylight Factor) so that the proposals meet the BRE Guide target criteria (and BS8206) for daylight, and the scheme has reasonable provision of sunlight availability to the new habitable living rooms.

Overall, as noted above the scheme proposals result in relatively minor massing changes when compared to the approved scheme which was considered appropriate in daylight and sunlight terms. It is therefore considered that the proposal is compliant with Local Plan Policy A1, London Plan Policy 7.6, Draft London Plan Policy D6, and the NPPF.

5.7. Amenity (inc. Air Quality and Noise)

The scheme has been designed to ensure that there will be no adverse impacts on neighbouring properties in terms of amenity. The proposed window locations and terraces have all been carefully and appropriately located to ensure that any direct overlooking is mitigated. It is important to note that the site is located on the corner of a road, and therefore there is an appropriate separation distance with those properties across the road from the application site on the southern and eastern side of Ferdinand Place and the closest property on Collard Place. It is considered that there are no amenity issues relating to overbearing nature or overlooking for the properties mentioned above.

Careful consideration has been applied to the neighbouring development (to the west) at 10-12 Ferdinand Street, which comprises two four storey buildings of residential flats. The massing of the scheme generally remains the same as the previously approved scheme (2016/2457/P) albeit 100mm smaller at the parapet, and we therefore consider that there is no further impact on amenity to this building. As part of the previous application (referenced in the pre-application response), it was considered that there would be an increased sense of enclosure and loss of outlook to 10-12 Ferdinand Street, however, this is due in part to the way 10-12 has been designed. Potential overlooking was also judged to be acceptable, as there would be no windows directing facing opposing windows and terraces would utilise privacy screening to prevent overlooking to habitable rooms. The proposal remains sympathetic to 10-12 Ferdinand Street, by proposing a similar mass to the approved scheme and ensuring considerate window and balcony positioning. The proposed roof terrace is considered to be set-back a sufficient amount from the west elevation closet to 10-12.

An Air Quality Assessment has been prepared by Air Quality Assessments Ltd, and is submitted as part of this planning application. The report concluded that the impacts on air quality at the proposed development due to emissions from the local road network are acceptable, with predicted concentrations being below the air quality objectives. The operational air quality impacts of the development are judged to be insignificant, and this judgement has taken account of the conclusion that no residents of the proposed development will be exposed to exceedances of the objectives.

The construction phase will have the potential to create dust. It will therefore be necessary to implement mitigation measures to minimise dust emission. The mitigation measures will be included in an Air Quality and Dust Management Plan (AQDMP), which can be submitted to the local planning authority for approval prior to commencement of work on site, if considered necessary by the council. A summary of these measures has also been included within Appendix 4 of the report. Overall, the report concludes that there should be no constraints to the development with regards to air quality, and is consistent with the relevant parts of the Camden Local Plan, London Plan and NPPF.

An acoustic report has also been prepared by Auricl, and is submitted as part of this application. An environmental noise survey was undertaken to determine existing noise levels affecting the site and surroundings. Based on these survey results, calculations have been undertaken to determine the acoustic requirements of the residential facades, so as to achieve suitable internal noise levels within the residential properties. It was concluded that Camden Council's 'LOAEL' internal noise level requirements could be achieved using standard, non-acoustic thermal double glazing and non-acoustic trickle ventilators.

External noise levels are also sufficiently low that use of opening windows as a primary means of mitigating overheating is not likely to result in adverse effect. Based on the measured background noise levels and Camden Council's requirements, noise limits have been proposed for any new building services plant associated with the development and noise control measures proposed. Calculations have been undertaken to predict the worst-case potential noise impact of the proposed fourth-floor level roof terrace. The assessment concluded that the predicted worst-case increase in ambient noise levels at the nearest noise sensitive property would be negligible.

Overall, the site is considered to present minimal impacts on the amenity of the surrounding developments, and where risks have been identified, mitigation has been proposed to ensure that impacts are negated. In our opinion, the application does not cause any detrimental impact on neighbouring amenity, and is therefore compliant with Local Plan Policies A1, CC4, London Plan Policies 7.14, 7.15, Draft London Plan Policies SI 1, D14 and the NPPF.

5.8. Energy and Sustainability

An Energy and Sustainability Statement has been prepared by JAW Sustainability and is submitted as part of this planning application.

An energy strategy has been developed following the energy hierarchy 'Be Lean, Be Clean, Be Green, Be Seen' detailed in the London Plan. Energy calculations using Building Regulations approved and accredited software have been undertaken at each stage to calculate the savings associated with the measures incorporated. The energy consumption and carbon emission figures within this report have been calculated using the approved Standard Assessment Procedure for the Energy Rating of Dwellings (SAP). In line with the London Plan, the energy hierarchy has been followed and a saving over the Part L 2013 targets achieved.

Solar gains are a passive form of heating from the sun's radiation and are beneficial to a building during winter months as they provide an effective source of heat and reduce internal heating requirements. In order to avoid overheating, the glazing strategy design has carefully considered orientation and window size to maximise daylight while controlling excessive solar gains. Glazing will incorporate low emissivity coatings to limit overheating without compromising light transmittance.

In terms of overheating, the impact of solar gains has been analysed as part of the SAP calculations, taking into account the ventilation strategies and the risk of solar overheating has been concluded to be not significant, when measured against the Part L1A criteria.

The development has also followed a cooling hierarchy which involves a number of measures to make the building more efficient. These include temperature sensitive gas boilers and highly efficient lighting, low emissivity coatings on windows to balance daylight overheating, the maximisation of floor to ceiling heights, dual aspect nature of all flats and the commercial unit to ensure passive ventilation and mechanical ventilation is provided to maintain air quality and noise.

Designing an efficient thermal envelope will greatly reduce the need for space heating and cooling as heat transmittance through the thermal elements is reduced. As part of a 'fabric first' approach, the building fabric has been carefully considered and specified to meet or exceed current Building Regulations minimum requirements.

In order to further reduce carbon emissions, solar PV was chosen as the most appropriate technology for residential sections of the development. In line with guidance from the GLA, the savings from the use of an air source heat pump for heating has been reported within the report. Highly efficient materials, waste management and construction, nature conservation and biodiversity and pollution management have all been considered as part of the through design of the proposals.

The development follows the energy hierarchy, incorporating passive design measures and energy efficient equipment. The development employs an efficient building fabric, including new insulation, highly efficient glazing, efficient gas heating, a commercial heat pump and a PV array to maximise carbon savings for the site, resulting in 23.32% residential savings over the Target Emissions Rate and a 19% saving for the commercial sections. Measures are also incorporated to minimise pollution and reduce water use. The development complies with sustainability policy of the London Borough of Camden and the London Plan, for minor developments.

Overall, we consider that the development has taken all the appropriate measures to ensure that the development reduces its carbon emissions and overall footprint. We therefore consider that the scheme complies with Local Plan Policies CC1, CC2, London Plan Policies 5.2, 5.5, 5.6, 5.7, draft London Plan Policies SI1, SI2, SI3, SI4, G5 and the NPPF.

5.9. Transport and Highways

A Transport Statement and draft Construction Management Plan have been prepared by Caneparo Associates and are submitted as part of this planning application.

The multi-modal trip generation has been included within the report, and indicates that the proposed residential units could generate up to 10 total person trips in the AM Peak Hour, up to 6 total person trips in the PM Peak Hour and 67 total person trips over the total day. As there will be no car parking spaces provided and a permit free agreement will be in place, no material vehicle trips will be generated by the residential units, except for servicing/delivery trips, which will be minimal for a development of this scale and nature.

A modal split for the proposed residential development has also been provided. The results forecast that the majority of the trips generated will be by public transport modes, with 6 total trips generated during the AM Peak Hour, 5 total trips generated during the PM Peak Hour and 47 total trips generated during the total surveyed day. In terms of walking and cycling trips, 2 total trips are forecast to be generated during the AM Peak Hour, 1 total trip forecast during the PM Peak Hour and 20 total trips generated during the total surveyed day. It is noted that the trip generation associated with the 179sqm commercial unit on the ground floor will be similar when compared with the existing use, effectively being a replacement with no material change in the trips that could be generated.

The proposed development will be car-free for the residential use. To mitigate against any potential on-street parking demand, the Applicant is willing to enter into a permit-free agreement, secured by way of a legal agreement as part of the application.

Cycle parking will be provided in line with the 'Intend to Publish' London Plan minimum standards. A total of 24 cycle parking will be provided within secure cycle stores for use by all residents and visitors to the site. This is inclusive of 2 cycle parking space to be allocated to visitors (short-stay). It is noted that the cycle parking is accessible for all users, as it is located on ground floor level and therefore easy to access and secure. It is also noted that this is inclusive of 4 cycle parking spaces allocated for the commercial element in line with the 'Intend to Publish' London Plan minimum standards.

The existing development provides two separate garage facilities which are accessible on the south and east frontages of the building from Ferdinand Place. As part of the proposals the garages and associated accesses will be removed which is considered to be a benefit given there will no longer be the opportunity for the site itself to generate vehicle activity. The removal of the accesses and opportunity to reinstate the footway will also improve the pedestrian environment by providing an uninterrupted footway without vehicles crossing over it in/out of the site.

All servicing, deliveries and waste collection for the proposed development will be undertaken within Ferdinand Place, which is as per the existing situation. Residential developments, based upon information within the TRICS database, generate around 12-15 delivery and servicing trips per 100 units per day. As such, the proposed residential element would be expected to generate up to 2 deliveries per day. Deliveries would be expected to be made predominantly by small to medium sized goods vehicles, for instance, cars and panel vans delivering internet shopping goods. It is noted that office use typically generates circa 0.25 daily deliveries per 100sqm of floor space, which would result in less than 1 delivery trip per day for the 179sqm of commercial use. As such, there is not anticipated to be a material impact from deliveries and servicing of the proposed development.

The development will be provided with a bin storage area that will be located to the front of the proposed building, within a communal area, which provides independent access to each bin and within a 10m drag distance of the public highway. In accordance with the existing situation for the site and its neighbouring properties, all refuse vehicles will stop on the public highway across the site frontage. The bin storage location is located within 10m drag distance from the public highway, which is acceptable.

Overall, an assessment of the effects of the development identifies that it will not result in a material impact on the local transport network. As required by the Council, a draft Construction Management Plan Pro Forma has been submitted as part of this application. It is intended to be a live document whereby different stages will be completed and submitted for application as the development progresses.

The proposed development is considered to be as sustainable as possible in transport terms, and due to its central location and high PTAL rating will be mostly travelled to and from by public transport. Servicing and delivery and refuse collection are all considered to have no impact on the existing highway. Overall, the application is compliant with Local Plan Policies T1, T2, London Plan Policies 6.19, 6.13, draft London Plan Policies T5, T6 and the NPPF.

5.10. Ecology

An Ecological Impact Assessment has been prepared by ECOSA and is submitted as part of this planning application. Field and desktop surveys were undertaken to determine the presence of protected species or their habitats.

The site entirely comprises a building; no other habitats are present. During the survey, a starling nest was recorded within the building. No bats were recorded emerging from the on-site building during the survey and the survey therefore suggests bats are not using the building for roosting. Low levels of foraging/commuting common pipistrelle bats were recorded off site, some distance away.

Demolishing the building has the potential to result in the killing and injuring of breeding birds and lead the permanent loss of suitable nesting habitat. Demolition works should therefore be carried out outside of the main nesting bird season (March to August inclusive). Bird boxes will be erected on the exterior of the building to compensate for the loss of suitable nesting habitat. As a form of enhancement, bat boxes will be integrated into the newly constructed building.

Given the impacts identified, the mitigation, compensation and enhancement measures proposed, it is considered that the proposals accord with all relevant local and national planning policy.

Post-development, no residual or cumulative impacts are anticipated and overall the proposal has sought to ensure that there will be no impact on protected species or their habitats, and should species be found, the appropriate mitigation measures will be applied. The application is therefore compliant with Local Plan Policy A3, London Plan Policy 7.19, draft London Plan Policy G6 and the NPPF.

5.11. Trees and Landscaping

An Arboricultural Planning Statement has been prepared by AD Trees and is submitted as part of this planning application. The statement includes a Tree Survey, Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement.

Both the subject trees that are relevant are both located offsite, and both will be retained as part of the proposal. Both these trees can be adequately protected during construction using site hoarding or protective fencing in accordance with BS5837 standards.

Some pruning will be required to T1 in order to remove overhanging branches and allow construction to proceed. However, these works will not harm the tree to any significant degree.

The arboricultural impact associated with the development will be very low as the footprint of the proposal is the same as existing.

5.12. Contamination

A Phase 1 Environmental Report has been prepared by Go Contaminated Ltd and is submitted as part of this planning application. Based on the information currently available, there would appear to be a low to moderate risk of potentially significant contamination on site.

It is recommended that some preliminary intrusive environmental site investigation is undertaken to determine if contamination is present on the property. A barrier water supply pipe may be required by the water supply company. It is recommended that this report is provided to the water supplier with a request for testing, if any, that they require.

A full scope of works document may have to be prepared and agreed with the local authority, prior to undertaking any intrusive investigation. This can be included as a suitably worded condition within a planning permission.

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Should any visual or olfactory evidence of contamination be noted during the works this should be investigated by a suitably person and their recommendations implemented. Furthermore, if any potentially contaminated spoil is to be removed from site, the Waste Acceptance Criteria (WAC) testing should be agreed with the facility to which the spoil is being transported.

If significant organic containing material is identified within the made ground, then monitoring of potential ground gases, over a suitable period of time, may be required in order to determine the requirement for gas mitigation measures.

6. Planning Conditions and Obligations

6.1. Planning Conditions

Paragraph 55 of the NPPF states that Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.

The PPG notes (paragraph 007, ID 21a-007-20140306) that it is important the local planning authority limits the use of conditions that require their approval of further matters after the permission has been granted unless they are specifically justified. Such conditions should be discussed with the applicant before permission is granted to ensure that unreasonable burdens are not being imposed and that these conditions ensure that the timing of submission meets the planned sequence of developing the site. From October 2018, planning permission for the development of land may not be granted subject to pre-commencement conditions without agreement of the applicant.

Planning conditions that unnecessarily affect the ability to bring a development into use, allow a development to be occupied or otherwise impact on the proper implementation of the planning permission, should not be used. If the Council requires additional information in order to fully assess the proposal, we would welcome the opportunity to be able to provide this to the Council during the consideration of the application to avoid the need for pre-commencement conditions which would otherwise prohibit our client from meeting their programme.

In addition to the standard time limit and approved documents, it is anticipated that planning conditions may be necessary in respect of the following matters:

- Samples and details of external materials
Detailed plans and elevations of parts of the development
- Details of Photovoltaics
- Noise and vibration limits
- Details of plant equipment
- Contamination monitoring and remediation
- Ventilation strategy for air quality
- Flue and extract details for air quality
- Delivery Servicing Plan
- Compliance in respect of:
 - Ecology and biodiversity features
 - Cycle parking
 - Refuse storage
 - Construction Management Plan

6.2. S106 – Heads of Terms

Planning obligations can assist in mitigating the actual or potential impacts of development. They can only constitute a reason for planning permission if they meet the tests set out in paragraph 56 of the NPPF. This states that the obligation must be:

- Necessary to make the development acceptable in planning terms
- Directly related to the development
- Fairly and reasonably related in scale and kind to the development

The Council adopted the Camden Planning Guidance Developer Contributions in March 2019.

At this stage, we propose the following Heads of Terms, which will be subject to ongoing discussions with the Council:

- Affordable Housing Payment in Lieu
- Pedestrian, Cycling and Environmental (PCE) improvements contribution
- Car-free
- Construction Management Plan
- Highways contribution
- Sustainability Plan
- Energy Plan

6.3. Community Infrastructure Levy (CIL)

The Council adopted their CIL Charging Schedule in March 2015. The site falls within the Council's Zone B Charging Zone. The CIL charging rate applied in Zone B is £25 per square metre for office developments and £500 per square metre for residential developments. The Mayoral CIL2 rate is £80 per square metre.

7. Summary and Conclusions

This document has been prepared in support of scheme proposals at 1,3 Ferdinand Place for a high quality mixed-use scheme providing a mix of residential flats and office accommodation, in a highly sustainable location.

The comprehensive and detailed submission demonstrates clearly, in our view, that the submitted scheme proposals should be supported. It accords with planning legislation and guidance at local and national levels; and the development proposals make effective use of a highly sustainable site, embrace high quality design principles, and have been developed by paying close attention to detail in its aesthetic composition in its immediate townscape.

The scheme proposals accord with the key considerations of the NPPF, The London Plan and the Camden Development Framework Policies. It is compliant with the relevant policy as confirmed below:

- The scheme seeks to accommodate population growth within London and Camden and meet a demand for housing as identified by the Council;
- The proposal makes efficient and effective use of the site, proposing higher density development in London to meet housing need and encourage economic growth;
- The scheme provides high quality office accommodation to support the vitality of the local economy;
- The proposed design approach has been carefully considered to take account of the form of the existing development layout and neighbouring properties (effectively, broadly maintaining the scale and massing);
- The scheme proposals have been designed with careful consideration in terms of scale and density reflecting the site's location and public transport;
- The scheme designs positively respond to the local context, townscape and character of the area;
- The scheme design respect and enhances the significance, in terms of architectural and aesthetic value, of the host building;
- The proposed residential accommodation will provide a good living standard for future occupiers of the development;
- The scheme provides car-free residential units within a highly accessible and sustainable location in London with provision of cycle parking;
- The amenity of adjoining properties would not be affected adversely in any way;
- The development will be sustainable in terms of its energy strategy and carbon reduction; and
- The relevant considerations and precautions have been taken in respect of air quality, noise, ecology, existing trees and contamination.

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The application scheme presented seeks to optimise the development opportunity, and potential, presented by the subject site, whilst paying regard to all of the constraints and policy requirements that any mixed-use and residential development proposal must address. Taking into account this assessment and all relevant planning related matters, we consider that there are sound and compelling planning reasons to support the principle of a development scheme at no. 1,3 Ferdinand Place , and in the manner illustrated here, with CoveBurgess Architects' well-devised scheme proposal. We trust that this development proposal, the principle of development and the investment that is being presented for the Council to consider, will be supported by Officers.

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Appendix 1 – Leverton and Son's Letter

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LEVERTON & SONS LTD

Independent Family Funeral Directors since 1789

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Dear Sir/Madam,

We are writing as the former occupier and owner of the above building, which we have recently sold to Luxgrove Capital Partners ('Luxgrove'). This letter seeks to accompany Luxgrove's planning application, and provide background and commentary to the disposal of the above building and our continued operations in the Borough of Camden.

As you will be aware, we secured planning permission across the above site, as well as nos. 4, 6 and 8 Ferdinand Place for the demolition of existing buildings and erection of two new four storey plus basement buildings to provide replacement funeral directory facility at ground and basement levels of 4-8 Ferdinand Place and provision of 19x residential units (6 x 1- bed, 8 x 2-bed and 5 x 3-bed units), split across both sites (Camden reference: 2016/2457/P).

Having secured the above permission, and appraised the scheme, it became clear that it was no longer viable for us to pursue the implementation or delivery of the permission. We since decided to raise further funds to allow us to continue to operate at nos. 4, 6 and 8, with potential future proposals to upgrade this site, by disposing of nos. 1, 3 Ferdinand Place. The disposal of this site would raise funds, whilst equally not restricting or prohibiting our continued operations from nos. 4, 6 and 8.

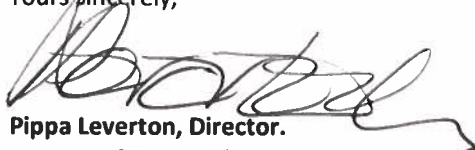
We can confirm that the site at no. 1, 3, Ferdinand Place has effectively been surplus to our requirements for some time, and has been used to a low-level of intensity, largely for storage purposes and car parking since 2017. The residential flat at floor level was last occupied on 14th July 2016, and shares a communal entrance lobby with the funeral directors use. Our recent usage of no. 1, 3 is now being accommodated within nos. 4, 6 and 8.

We are reviewing our options in respect of nos. 4, 6 and 8, albeit we can confirm that the disposal and redevelopment of nos. 1, 3 will not in itself restrict or hinder our continued operations in the Borough of Camden.

Finally, in respect of the application proposals, given they seek to broadly reflect what has previously been granted planning permission before, we are supportive of the proposals and do not believe they will have any adverse impacts on our operations or the locality.

We trust that this letter is clear and helpful.

Yours sincerely,



Pippa Leverton, Director.
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