

From: Enya Fogarty
Sent: 17 July 2023 09:19
To: Planning Planning
Subject: FW: Objection to 2023/2245/P
Attachments: Daylight Sunlight Overshadowing Report - Grounds for Objection.pdf;
Updated Core Objections to Drury Works.docx

Hi team,

Can you please upload and redact this objection .

Thanks,

Enya Fogarty
Planning Officer
Supporting Communities
London Borough of Camden

5 Pancras Square
London N1C 4AG



Please consider the environment before printing this email.

Subject: Objection to 2023/2245/P

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious. Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

Good morning,

I have serious concerns regarding the development at the back of our property, especially for the residents that I have living on site. I am in contact with Friends of Parker Street with whom professional advice has been put together. A Core Objection document that I support is attached

Loss of light

A report on Daylight/Sunlight/Overshadowing(attached) organised independently from the developer's one list for 1 page ½ all the issues associated with my property. I understand that these results are not acceptable and I object to the 5th floor. 40 Great Queen Street is one of the most affected parties and the breaches on light are well passed any guidelines. I would like for the Council to intervene and amend the part of the design of the building which severely reduces light to my property.

Potential issues linked to the 2nd floor terrace.

I have for the residents of my property the same concerns than all the residents at the back of this development. Please see the "Core Objections" document attached, from page 3. When not working in the pub, I am concerned that my tenants living at the back will be affected by noise and be at high risk of being overlooked, in what is really a residential enclave. On that basis, I would object to the large 2nd floor terrace.

Thank you for your consideration.

I look forward to

Kind regards

Kieran Rice

Core objections to planning scheme 2023/2245/P

redevelopment of the office block at 160-161 Drury Lane London WC2B 5PN.

2019 Application for development of the same site.

In 2019 a previous owner of the site successfully applied for planning permission for a significant increase in the size of the building (Application 2019/2095/P). It is local residents' belief that the approval given was flawed. Erroneous information was contained in the application and some data on overshadowing was missing. There was no effective public consultation about the 2019 application so there was no effective challenge to the contents.

The 2019 application expired in late 2022 and so is not the relevant benchmark for assessing the impacts of application 2023/2245/P ("The 2023 Application") on nearby premises and the overall streetscape. Furthermore, the 2023 developer's Application makes repeated and highly selective references and comparisons to the 2019 approval.

Local sensitivities are driven by impacts on the status quo, not a hypothetical scheme which never left the drawing board. Camden Planning is urged to view the application in relation to the existing conditions and not a time-barred, flawed earlier application.

Public consultation on the 2023 Application

After pre-application liaison with The Council the applicant entered a phase of public consultation on the scheme. Public response to the consultation revealed deep concerns from local residents about a range of issues including bulk/height, loss of light, creation of noise and privacy. From the application submitted it is apparent that no heed has been taken to the response of the public and that the 'consultation' was undertaken for appearance's sake with no willingness to adapt the plan.

The local environment

Parker Street is essentially a residential street as are Drury Lane and Great Queen Street above ground floor level. All of the buildings which adjoin 160-161 Drury Lane are occupied by residents for whom studying, working from home, quiet enjoyment of private spaces and quality of sleep are vitally important. The Council must take careful account of the needs of these residents who derive no benefit from the proposed scheme.

The applicant identifies the elimination of antisocial behaviour along its Parker Street frontage as a key community benefit; this antisocial behaviour is a direct consequence of the owner's mismanagement of the premises; its poor condition and air of abandonment is a magnet for antisocial behaviour. This could be overcome by the owner simply managing the premises better.

The proposed design and built form.

The proposed fifth floor is as vertical extension which is more dominant than a mansard roof (as built on many of the nearby buildings); a mansard roof would be set back from the parapet, all around the building, causing less impact to the neighbouring roofscape and to the character and appearance of the conservation area. The fifth floor would sit as a hard edge block in design terms that would not fit in with the wider character and streetscape. It would be an awkward and abrupt termination of the roofline which would form a hard profile.

In its pre-application response, the Council notes the potential for overbulking though still appears to undervalue its impact. The applicant (presumably acting on the advice from the Council) has scaled back a proposal to extend 2nd and 3rd floors though significant bulking of the rear of the 4th and 5th floors is proposed much to the detriment of adjoining residences.

We strongly object to the 4th floor back extension on several grounds

- Overshadowing of terraces, balconies and gardens survey was not assessed at all in 2019, even though requested at the time by the Council, in their 2019 pre-application advice (point 5.19)
- Some properties are severely affected when it comes to Daylight, Sunlight and Overshadowing of terraces, and the 4th floor extension is a contributing factor.
- A couple of errors were made in the review process in 2019. One relates to the outlook impact on flat 5, 158 Drury Lane and the other misrepresented a key window in Flat 6, Market House.

We object to the 4th floor extension based on the amenity impact on residents. This 4th floor extension contributes to the reduction of daylight/sunlight for residents. Individual severely affected properties will produce expert data to the Council within their own personal objection.

The 4th floor extension also contributes to making the building overbearing upon neighbours. It would result in a loss of outlook and an increased sense of enclosure. The 4th floor extension impacts specifically 2 flats at the 4th floor level (1 at 158 Drury Lane, 1 at Market House, 12 Parker Street)

Based on the arguments above, we argue that the 4th floor footprint needs to remain unchanged.

We also strongly object to the fifth floor back extension.




We note in the preapplication response (reference 2021/5640/PRE dated 2nd June 2023) that the Council raised concerns with a proposed 2nd to 4th floor rear extension and the impact it would have on the occupiers of the flats immediately adjoining sites 158/159 Drury lane and 8 – 10 Parker Street, which would add a sense of enclosure.

The preapplication response stated ‘... it is considered that the proposal to add approximately 2m to the 2nd, 3rd and 4th floor flank wall abutting 8 Parker Street and to extend the approved fifth floor / roof out by 1.5m would be overbearing and over-enclosing upon all the rooms and the terraces at the rear of this site. For these reasons, it is recommended that the proposed 2nd to 4th floor rear extensions and the proposed rear extension to the proposed fifth floor / rooftop extension should be omitted from your proposals.’

Whilst it appears that the proposed plans have omitted the 2nd to 4th floor extension, the 1.5m deep extension to the fifth-floor extension remains.

The additional extension will introduce additional bulk and mass to an already substantial building. It would have an adverse overbearing effect that would result in an unduly oppressive living environment for existing residents within Flat 6, 12 Parker Street and residential properties in Drury Lane as shown in the photographs below. It will create a sense of enclosure and adversely affect the outlook from habitable room windows.

This 5th floor element should be deleted from the application.

		
View from 4 th floor flat, 158 Drury Lane	View from 5 th floor studio, 12 Parker Street	View from 4 th floor flat, 12 Parker Street

It is our belief that any heightening of the building should require stepped-back upper storeys with a mansard roof, like many in the neighbourhood, and not a brutal extended vertical face.

The proposed 1st floor rear extension

The proposed 1st floor extension at the rear of the building will create a very large vertical cliff-face which will dominate the courtyard behind 8-18 Parker Street and reduce its natural light. For residents in 158,159 Drury Lane windows which presently look onto the open quadrangle of the 'light well' will be looking onto a vertical wall. This is unacceptable.

The plans do not make clear the future status of the short steel stairway from the existing 1st floor to the Parker Street back yard.

The proposed terrace at 2nd floor level.

The scheme proposes the creation of an open terrace at 2nd floor level at the rear of the building. The applicant has made a spurious claim that the existing flat roof at 1st floor level has been in historic use as a terrace. This is a direct misrepresentation. The existing roof is not an amenity area and is used only as part of the fire evacuation route and for maintenance of air conditioning plant.




The planning officer's report on the 2019 application and the sales prospectus for the building when it was acquired by the applicant made it clear that the "areas to the rear are not included as amenity areas.....access should be restricted for emergencies only. The opinion stated by the Council in 2019 was that the application *"provides an opportunity for a condition to prohibit access to these areas other than for maintenance or escape purposes"*

It led to the 2019 decision Notice stating as Condition(s) and Reason(s) number 10:

"A) Access to the north-eastern 6th floor roof terrace adjacent to no.8 Parker Street, 5th floor rear flat roof and 2nd floor rear flat roof shall be restricted for escape or maintenance purposes only and shall not be used for amenity purposes at any time".

“Reason: To safeguard the amenities of the adjoining occupiers at 158-159 Drury Lane, 8-16 Parker Street and the area generally in accordance with the requirements of policies G1, A1 and A4 of the London Borough of Camden Local Plan 2017”

Residents’ objection to this terrace revolves around privacy and noise; The proposed terrace would be one storey higher than the view in the photograph below and will allow direct views into habitable windows in Parker Street, Drury Lane and Parker Street, resulting in a material loss of privacy.

		
View from 2 nd floor flat, 158 Drury Lane	View from 2 nd floor flat, 12 Parker Street	View from 1 st floor flat, 39 Great Queen Street

Any screening (none is proposed in the drawings) to overcome loss of privacy will add further bulk and height resulting in even further detriment to daylight/ sunlight and outlook from these habitable room windows.

With the emergency staircase removed the terrace will be of a sufficiently large size to accommodate a sizeable number of people and given the office usage it is assumed that it will be used for entertainment. The terrace will be in close proximity to habitable windows serving residential properties along Drury Lane, Parker Street and Great Queen Street and would create significant noise and disturbance from conversation and music which would be detrimental to the amenities of these residents.

This Council should maintain its 2019 stance that the use of any rear terrace (and the flat roof on top of the main building) should be for emergency use only.

Daylight/ Sunlight

The quadrangle of buildings along Great Queen Street, Parker Street and the part of Drury Lane connecting them acts as a ‘light well’ for numerous residences. The rear yard of Market House, Parker Street is a year-round amenity for the residents and the bulking of the upper storeys and the proposed extra floor on the rear of 161 Drury Lane will detrimentally impact daylight and sunlight to a number of residences, to numerous terraces/ balconies and the yard.

View from 2nd floor on one of the significantly affected property, 40 Great Queen Street.



One of the deficiencies in the 2019 permission was that no account was taken of the overshadowing of terraces and balconies of residences. This is a huge issue for the amenity value of residents limited outdoor space and is something which the Council must consider.

In the 2023 application the applicant attempts to draw the eye away from the year-round impact by claiming that “the summertime results are fully compliant with the BRE guide...”. The BRE Guide does not set targets for summertime results and to describe this as ‘compliance’ is wilfully misleading.

Certain residences with the greatest loss of light will submit individual objections to the loss of that light which will be provided by our expert witness (Right of Light Consulting surveyor).

The applicant seeks to rely on removal of the hexagonal fire escape as a significant improvement to light reaching some parts of adjoining premises; However, the staircase is of open lattice construction and the benefit of its removal are exaggerated.

Ground Floor Retail.

Whilst the plans show a retail unit at ground floor level, concern is raised that a restaurant (previously A3) could now be accommodated without the need for permission given that the development falls under class E.

In the 2019 application, the Council acknowledged that this area is one that suffers from issues of noise and disturbance for existing licenced premises and recommended that a condition was attached to ensure there was no primary cooking to take place on site. The report at para 7.60 said: *‘Securing such a condition would negate the need for kitchen extract equipment, meaning that concerns in relation to the routing and discharge point of ducting and associated issues of noise and smells are avoided. It would also ensure that the unit would not be used for traditional restaurant (i.e. late night opening, licensed premises) and would instead cater for daytime focused business such as café or food store (under class A3). In this case, such a restriction would be considered reasonable given the existing issues experienced by residents and would therefore be necessary to make the development acceptable’.*

'Despite the restrictions on cooking imposed it is also considered necessary to limit the hours of operation for the ground floor commercial unit and for amplified music to not be audible from the highway to ensure that it does not operate at unsociable hours or lead to disturbance for residents.

The following two conditions were added, and we would therefore request the Council attach similar conditions to any approval:

- (Condition 7 of 2019/2095/P) No primary cooking shall take place within any part of the development hereby approve. 00d
- (Condition 9 of 2019/2095/P) The ground floor commercial unit fronting Drury Lane hereby permitted shall only be operated between the following times: Mondays-Saturdays 08.00-23:00 hrs; Sundays and Bank Holidays 09:00 -22.30 hrs
- Condition 13 No music shall be played on the premises in such a way as to be audible within any adjoining premises or on the adjoining highway.

From a residents' perspective allowing the premises to be used as late as 2230/2300 is not acceptable; to alleviate nuisance closure by 2000 hrs would seem more reasonable as the area is not short of catering establishments.

Bike and Bin Store.

At the time of the 2019 application concerns were raised regarding noise and disturbance from the location of the bin store adjacent to No 8 Parker Street. These concerns remain. From first principles this would be better located in the slot currently occupied by the existing bike store. This adjoins a retail premises which would not be subject to the nuisance issues which threaten 8 Parker Street.

If the Council does not require this reasonable adjustment to the plan, then a condition similar to condition 6 of 2019/2095/P requiring noise insulation must be applied.

Additionally, any ventilation of the bin area should be 100% passive (air bricks, for example) and not powered to eliminate the possibility of noise nuisance from an electric fan.

Impact of construction

The impact of noise, and dust will be considerable and to protect residents the Council must apply hours restrictions (say 0900-1700) and limit the noisiest activities to core hours (say 1000-1400). The residential population includes night workers, people who work from home and students for whom construction work will create every real disturbance.

Deliveries will need to be restricted to the hours 0900-1700 and vehicles are to be appropriately managed (engines off, flow of traffic to be maintained, pavements to be kept clear etc.

Dust will be a very real issue, and we urge the Council to require any construction management plan to incorporate additional cleaning for adjoining residents (including windows).

Right of Light Consulting

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Enya Fogarty
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14 July 2023

Dear Enya Fogarty,

Planning Application - 2023/2245/P
Proposed Development at 160-161 Drury Lane London Camden WC2B 5PN
Impact on Parker Street & Drury Lane Residents

We are appointed by the owners of properties on Parker Street and Drury Lane following concerns that the proposed development will have an oppressive and overbearing impact on the way they enjoy their properties.

The Building Research Establishment (BRE) "Site Layout Planning for Daylight and Sunlight 2022, 3rd Edition provides guidance for the planning department to consider. The introduction to the BRE guide at 1.1 states that "people expect good natural lighting in their homes and in a wide range of non-domestic buildings. Daylight makes an interior look more attractive and interesting as well as providing light to work or read by. Access to skylight and sunlight helps make a building energy efficient; effective daylighting will reduce the need for electric light, while winter solar gain can meet some of the heating requirements."

We have reviewed the daylight and sunlight study dated May 2023 prepared by Point 2 Surveyors Limited on behalf of the applicant. The results of which indicate that the proposed development at 160-161 Drury Lane will impact upon the daylight and sunlight receivable by the Parker Street and Drury Lane residents. In order to verify the results of the applicants daylight and sunlight study, we have been instructed to undertake our own assessment and analysis for comparison.

It is important to note that our 3D model is based on both internal scans of our clients properties and external scans of the neighbouring obstructions recorded using an RTC 360 Lecia Scanner by myself on 18th April 2023 & 13th June 2023. We therefore consider our results as likely to be a more accurate reflection of the issue.

2019 CONSENTED SCHEME: [EXPIRED]

Regarding the Point 2's presentation of comparison results relating to the formerly consented scheme from 2019, now expired. At Appendix F2, the BRE guide states:

- "Sometimes there may be an extent planning permission for a site but the developer wants to change the design. In assessing the loss of light to existing windows nearby, a local authority may allow the vertical sky component (VSC) and annual probably sunlight hours (ASPH) for the permitted scheme to be used as alternative benchmarks. However, since the permitted scheme exists only on paper, it would be inappropriate for it to be treated in the same way as an existing building, and for the developer to set 0.80 times values for the permitted scheme as benchmarks."

However, it should be noted that the former consented scheme has now expired. It is our understanding that the council is not bound in any way by its former decision to permit some development on the site and can therefore reconsider any aspect of the proposed development on this site without concession to its past judgement. This situation presents the council with an opportunity to consider new evidence, here presented, in its judgement of the new application. It is also worth noting that new application has a greater material impact on the daylight & sunlight amenity of some of its neighbouring properties, than the expired consented scheme for the site, due to an increase in proposed massing on parts of the site.

RESULTS DISCUSSION

Great Queen Street

It is noted that there are 3 windows at 40 Queen Street which do not meet the BRE Guidance. Point 2 have confirmed the following VSC results:

- W2/70: 3.24% down to 1.99% = 38% relative light loss
- W1/71: 8% down to 6.23% = 22.13% relative light loss
- W2/71: 10.43 down to 8.16% = 21.69% relative light loss

At section 8.16 – Point 2 have stated that "any slight outlook alteration is likely to trigger a disproportionate percentage light change". Whilst it may be considered that a small level of light loss in absolute terms leads to a disproportionate loss ratio, this is in our view, partly as a consequence of the challenge of reviewing technical data. Taking W1/71 as an example, which experiences an absolute VSC loss of 2.26%, and experiences a 22.13% reduction in its formerly enjoyed light. The loss of 2.26% may seem low in absolute terms, however, it could also be expressed as 8.37% of the 27% VSC target. Whilst that is a lower figure than the ratio element, it is clear that it still represents a significant proportion of the target level of light.

As discussed further below, 15% of absolute VSC is now sometimes applied as an alternative benchmark of commonly enjoyed, and by implication, acceptable level of light for urban properties. Since Point 2 has sought to apply this as a mitigating factor elsewhere within their report, it would be fair in our view to apply the logical conclusions of this position throughout, should the local authority agree with its applicability to begin with. Firstly, that none of the above windows meet that alternative target and therefore if other windows can be described as acceptable, these results cannot.

Secondly, and further to the point made above, that when considering whether an absolute loss of 2.26% leads to a disproportionate level of ratio loss, that the loss can now be expressed as 15.06% of the 15% alternative VSC target. We are of the opinion that the ratios of light loss not necessarily disproportionate since the absolute level of light loss makes up a significant part of what is considered an acceptable level of absolute VSC. It is therefore important to consider the ratio of light loss even when the absolute level may appear to be low. Indeed, for our clients, the remaining light that they enjoy is realistically precious to the habitability of their properties and the importance of light, particularly where the levels are low to begin with, cannot be understated from a human health perspective.

At section 8.17, Point 2 confirm that none of the 5 rooms which were tested for NSL meet the application of the BRE Guidelines. Point 2 have confirmed the following NSL results:

- R1/70: 16.8% down to 5.88% = 65% relative light loss
- R2/70: 13.79% down to 5.19% = 61.8% relative light loss
- R1/71: 46.87% down to 34.36% = 26.7% relative light loss
- R1/72: 72.95% down to 47.15% = 35.4% relative light loss
- R2/72: 76.63% down to 48.83% = 36% relative light loss

As discussed above for VSC, Point 2 have made the same 'existing low values' argument for rooms R1/70 & R2/70. Firstly, it is dubious as to whether the argument applies at all in these cases, 10.92% absolute NSL loss is likely to be noticeable to the occupants in our view. It should also be borne in mind that the test we are applying here is only assessing light levels above a certain threshold and therefore in real terms, it is possible for even small levels of light loss to be quite noticeable to those who live in proximity to new obstructions. However, taking R1/70 as an example, which experiences an absolute NSL loss of 10.92%, and experiences a 65% reduction in its formerly enjoyed light. The loss of 10.92% could also be expressed as 21.84% of the 50% NSL target. In our view, it is clear that this light loss represents a significant proportion of the target level of light. In our view, the NSL losses to all five rooms will have a significant impact on the residents in question.

At section 8.17, Point 2 also comment that the rooms on the 1st and 2nd floors are "blinkered by the configuration of the neighbouring buildings that challenge the availability of oblique light into the space behind the aperture" However, we note that no alternative analysis has been provided and we are of the view that the reduced availability of oblique light is essentially irrelevant when naturally windows depend more on the availability of direct light, which will be significantly reduced if the proposed development is approved.

Parker Street, Market House

Despite having access to both separate units at on 4th and 5th floor of Market House, 12 Parker Street, and confirming this within their report, Point 2's report makes two significant errors in its description of the properties.

Firstly, at section 8.23, it describes both rooms as serving Flat 6 when in fact they are two separate properties. For reference, 5th floor property is a self-contained studio with a 24sq meter terrace and the 4th floor property is a separate 3 bedroom flat with a 16sq meter terrace.

Secondly, at section 8.23, 8.25 & Appendix 2, it describes the key room of the 5th floor self-contained studio as a bedroom when it is clear that the room serves as the primary living space of the property and the implied argument that light to bedrooms is less important by virtue of the time of its likely use does not apply in this instance. Indeed, the living space of the room is set up so that it enjoys the benefit of direct access to the large terrace space, and it is this part of the room that is most affected, both in terms of light and of outlook.

At section 8.24 – Point 2 states that both windows W6/254 [Window 11] (4th floor) & W1/255 [Window 16] (5th floor) are within 10% of the 0.8 permitted ratio loss. However, there is a significant difference between our results for W1/255 [Window 16] (5th floor primary window leading in the terrace) and those of Point 2. Our results confirm that the window serving the Studio is both greater than 10% within the 0.8 permitted ratio loss and significantly less light following the development in absolute terms. Our results are as follows: a VSC of 23% before the development and 15.7% after the development [7.3% absolute loss & 32% relative reduction in formerly enjoyed light] whereas Point 2's report states that the window has a VSC of 32.28% before the development and 23.68% after the development 8.6% absolute loss & 26.64% relative reduction in formerly enjoyed light].

At section 8.24 – Point 2 states that the kitchen served by W6/254 [Window 11], on the 4th floor, is "adjoined by 5 fully compliant windows serving the same room". In our view, the kitchen and living room are notionally divided. The room as a small window on the rear elevation, but W6/254 [Window 11] are fully glazed doors which open directly onto the smaller terrace space. We therefore consider it reasonable to describe window W6/254 [Window 11] as the main window for the room and certainly central for access to its valuable amenity space.

As discussed above, our 3D model is based on both internal scans of our clients properties and external scans of the neighbouring obstructions recorded using an RTC 360 Lecia Scanner by myself on 18th April 2023 & 13th June 2023. We therefore consider our results as more likely to be a more accurate reflection of the issue. Accordingly, we disagree with Point 2's conclusion that W1/255 [Window 16] (5th floor) enjoys a post development VSC that could be described as "exceptional for an urban environment" [section 8.25].

In addition, as discussed above, a 15% of absolute VSC is now sometimes applied as an alternative benchmark. It is worth noting that that W6/254 [Window 11] (4th floor) does not meet that alternative target and that our results for W1/255 [Window 16] (5th floor) are significantly closer to 15% than Point 2's [15.7% vs 23.68%]. It is clear that the VSC enjoyed both windows at the properties will be significantly harmed by the proposed development.

Drury Lane

The results of our analysis have revealed an additional transgression of the BRE Guide not identified within Point 2's report. Namely, window 31 in Flat 5 on the fourth floor of 158-159 Drury Lane. The window enjoys a VSC value of 23.9% before the development, which is reduced by 5.1% down to 18.8% after the development which is equivalent to a 21% loss of the formerly enjoyed daylight to this window. This represents a material loss of light.

At section 8.14, Point 2 confirms that both of the main living rooms for the 1st floor flats fail the BRE Guidelines. Point 2 have confirmed the following NSL results:

- R1/11 [Served by windows 18 to 21]: 88.34% down to 65.5% = 25.8% relative light loss
- R2/11 [Served by windows 23 to 27]: 80.15% down to 63.38% = 20.8% relative light loss

In our view, the NSL losses to the main living room of both properties will have a significant impact on the residents in question.

OVERSHADOWING

At 3.3.17, the BRE guide states:

- "It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area that can receive at least two hours of sun on 21 March is less than 0.80 times its former value, then the loss of sunlight is likely to be noticeable..."

Point 2 have confirmed the following Overshadowing results:

- Terrace of 4th Floor Flat, 12 Parker St: 67.8% down to 28.7%
- Terrace of 5th Floor Self-Contained Studio, 12 Parker St: 43.1% down to 36.8%

These results are both significantly below the BRE recommendation of 50%. It is clear that the sunlight enjoyed by the roof terraces will be significantly harmed by the proposed development.

Our clients have confirmed that the outdoor amenity areas are indeed used all year round. Considering the importance of outdoor amenity space for human health, along with its scarcity in London, but with the benefit of its microclimate, we consider its use all year round to be a reasonable assumption. At 3.3.15, the BRE guide states:

- "If a space is used all year round, the equinox (21 March) is the best date for which to prepare shadow plots as it gives an average for the level of shadowing..."

Whilst the BRE guide permits presenting of overshadowing plots and results for alternative dates, it also sets out the limitations for doing so. At 3.3.15, the BRE guide states:

- “As an optional addition, plots for summertime (for example, 21 June) may be helpful as they will show the reduced shadowing then, although it should be borne in mind that 21 June represents the best case of minimum shadow, and that the shadows for the rest of the year will be longer...”

The report presented by Point 2 does not refer to these limitations. It also goes on to state that the summertime results are fully compliant with the BRE Guide. However, the guide does not explicitly set alternative targets for the summertime results, and we therefore consider it misleading to describe the result as compliant.

CONCLUSION

On behalf of the owners of properties on Parker Street and Drury Lane, we request that no decision is made in favour of the application until the proposed design is amended so that it significantly reduces the clear adverse impact it will have upon the daylight & sunlight amenity of our clients.

Should you have any queries, or would like to discuss the above concerns, please do not hesitate to contact me.

Yours sincerely,

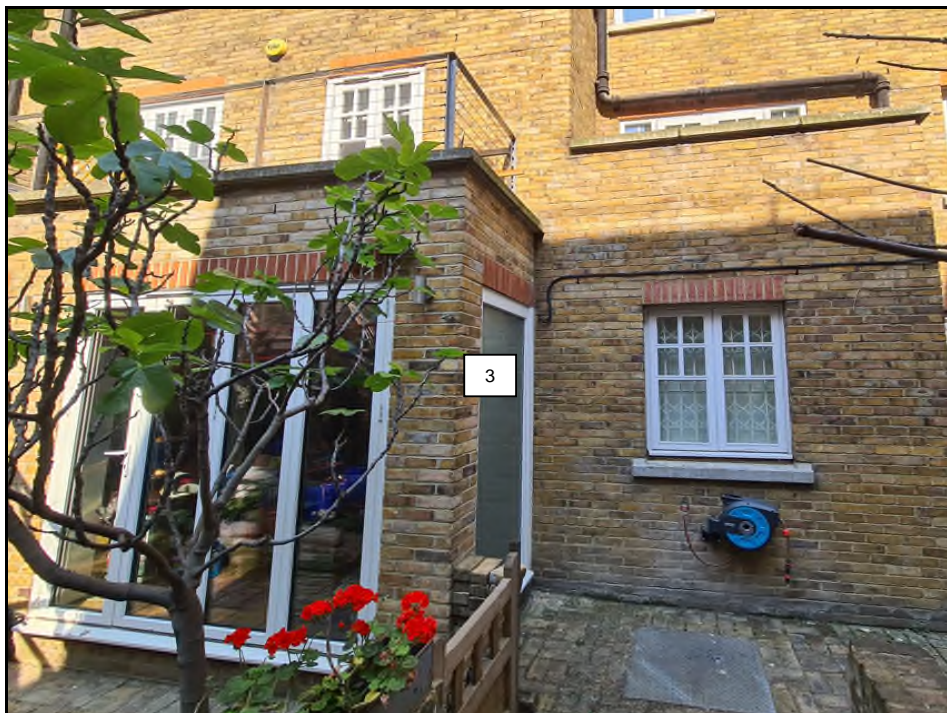


Charles F McMahon LLB (Hons) MSc Psy

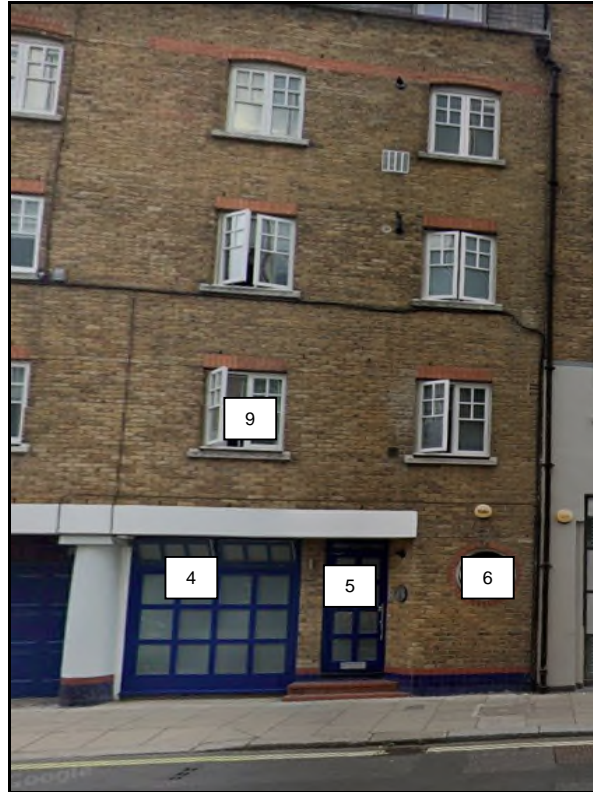
Neighbouring Windows



2 to 6 Parker Street



2 to 6 Parker Street



2 to 6 Parker Street



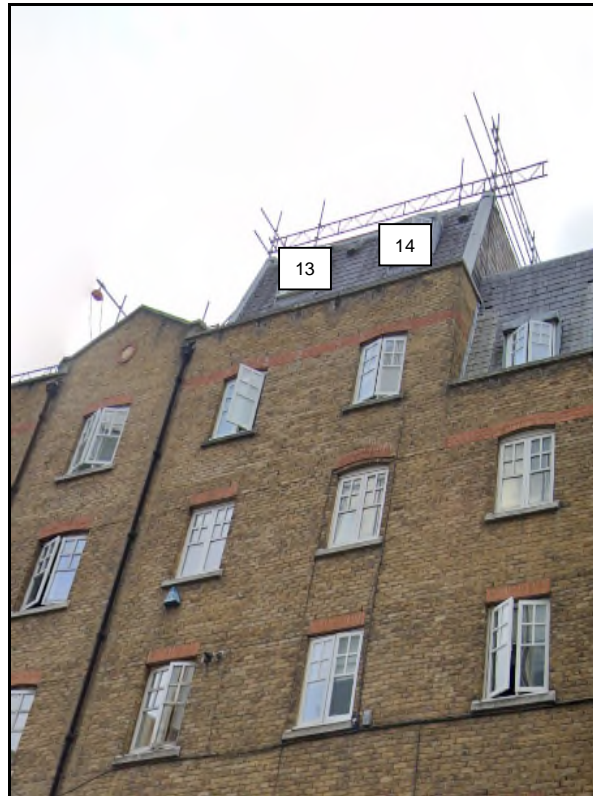
2 to 6 Parker Street



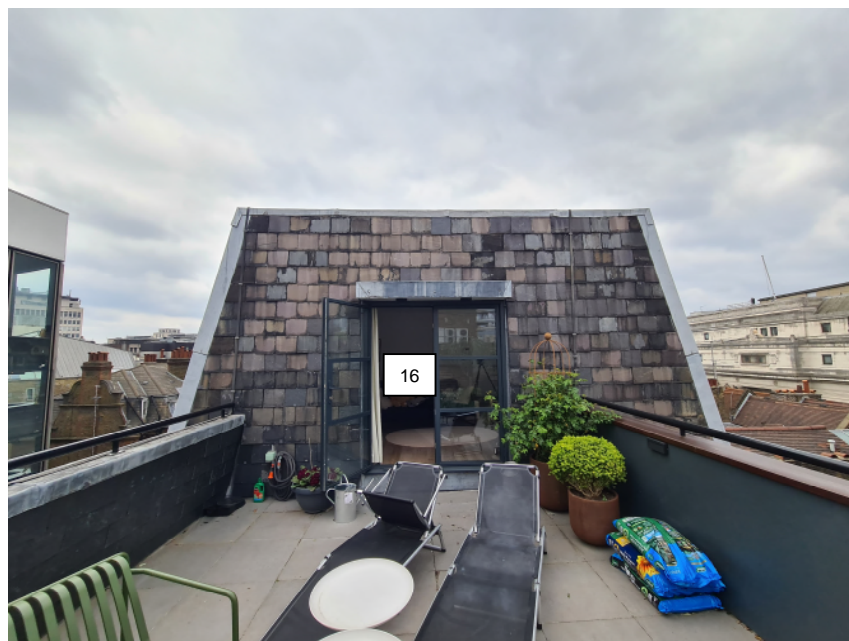
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2 to 6 Parker Street



2 to 6 Parker Street



2 to 6 Parker Street



158 to 159 Drury Lane



158 to 159 Drury Lane



158 to 159 Drury Lane



158 to 159 Drury Lane



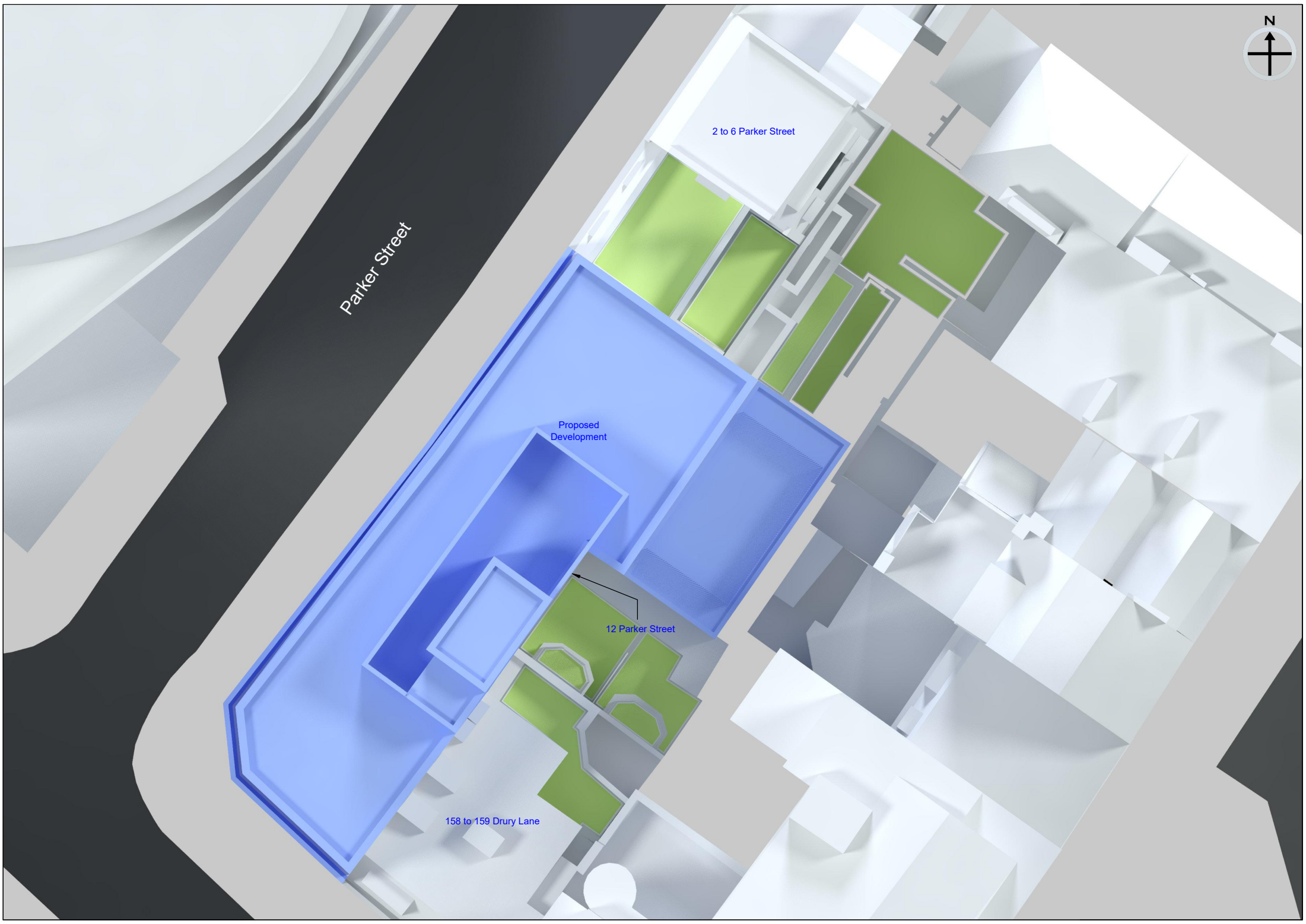
Parker Street

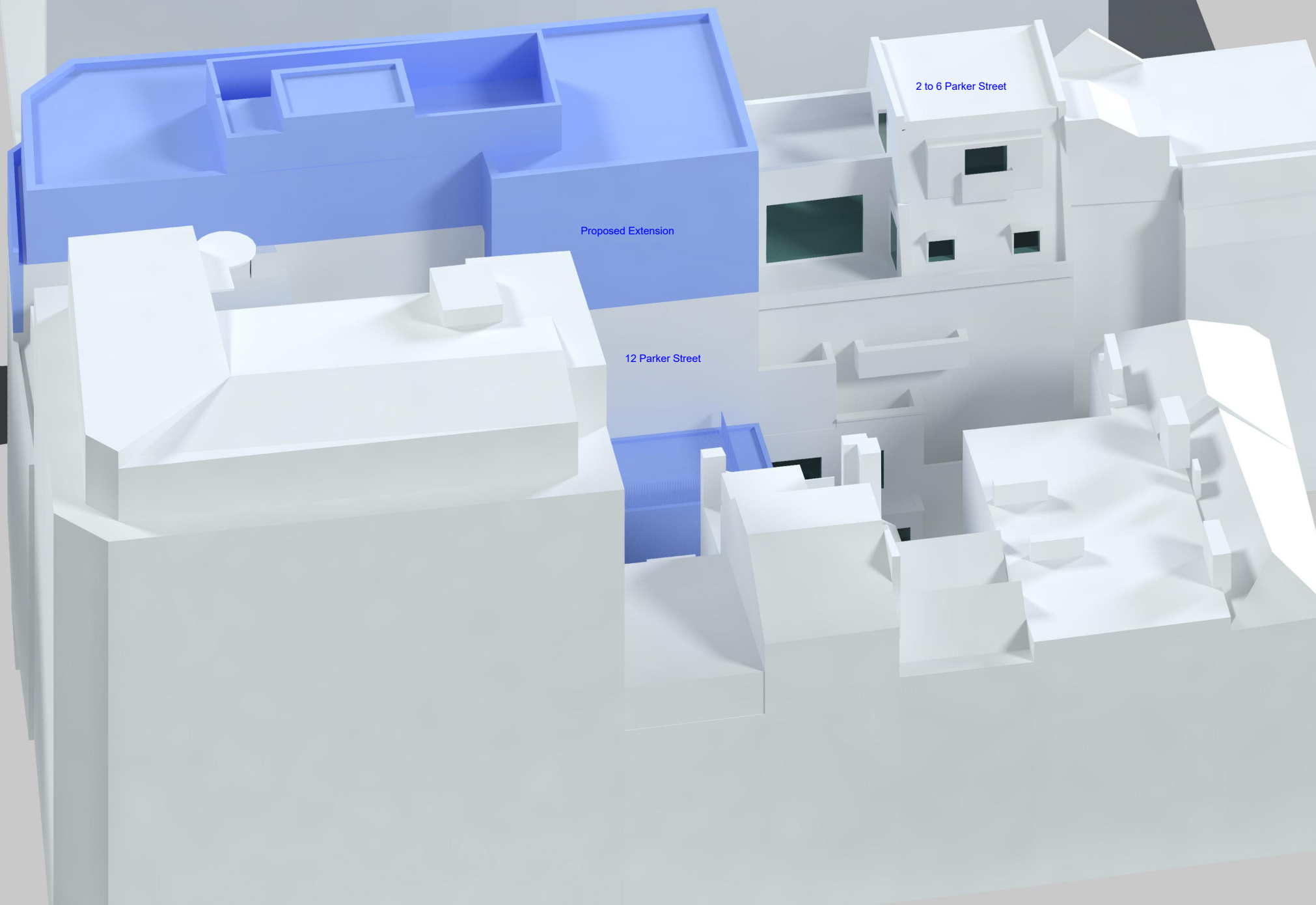
2 to 6 Parker Street

Proposed Development

12 Parker Street

158 to 159 Drury Lane





Proposed Extension

2 to 6 Parker Street

12 Parker Street



2 to 6 Parker Street

Parker Street

Proposed Extension

12 Parker Street

158 to 159 Drury Lane



158 to 159 Drury Lane

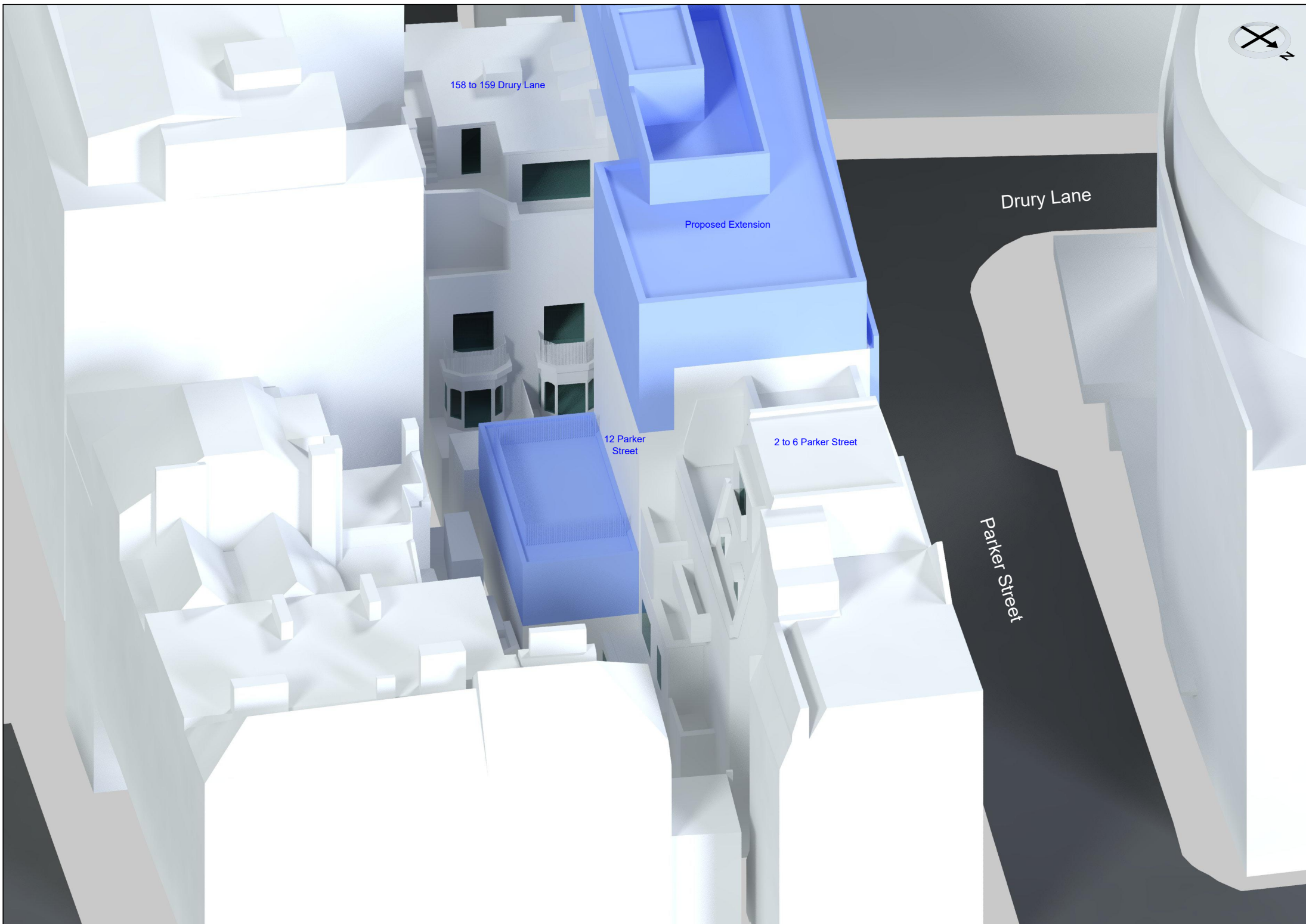
Proposed Extension

Drury Lane

12 Parker Street

2 to 6 Parker Street

Parker Street





Proposed Extension

2 to 6 Parker Street