

**135 Shaftesbury Avenue,  
London**

**Daylight, Sunlight and  
Overshadowing**

**Review of addendum submitted information  
(2024/0993/P)**

London Borough of Camden

08 April 2025

# **Lichfields is the pre-eminent planning and development consultancy in the UK**

**We've been helping create great places  
for over 60 years.**

**[lichfields.uk](https://lichfields.uk)**

## Executive Summary

Analysis of the neighbouring residential properties has been undertaken by the POINT 2 with reference to the guidance given in the Building Research Establishment document “*Site Layout Planning for Daylight and Sunlight - a guide to good practice.*” Analysis was undertaken using Vertical Sky Component (VSC), No-Sky Line (NSL), Annual Probable Sunlight Hours (APSH), Sun Hours on Ground (SHoG) and transient overshadowing testing. We have not reviewed the analysis model used but assume that the correct testing techniques have been employed for each of these tests. Further studies have been provide in an addendum note that details the cumulative effects of the proposed developments at 135 Shaftesbury Avenue, 125 Shaftesbury Avenue and 151 Shaftesbury Avenue.

Eleven neighbouring properties have been identified as requiring testing and on the whole, we would agree that no further properties would need to be tested. Study of the information submitted indicates the modelling of these properties, the proposed development and the surrounding context is suitable for the analysis undertaken.

Review of the results tables appended to POINT 2 report P2904 (February 2025) shows:

- 283 (77%) of the 367 windows tested comply fully with the BRE Report VSC guidance.
- 172 (84%) of the 205 rooms tested meet the BRE Report NSL/DD guidance.
- 102 (66%) of the 154 windows tested meet the BRE Report APSH guidance.

The cumulative studies show notable combined effects:

- 167 (45%) of the 369 windows tested comply fully with the BRE Report VSC guidance.
- 134 (65%) of the 206 rooms tested meet the BRE Report NSL/DD guidance.
- 47 (30%) of the 156 windows tested meet the BRE Report APSH guidance.

Whilst there are some discrepancies between the reported compliance and our review they are on the whole unimportant and the POINT 2 Report overall findings are supported.

The cumulative studies show significant deviations from BRE Report guidance. As discussed in the POINT 2 addendum note, these are due to the combined effect of three developments with no one development being responsible for the increased impact.

Overshadowing analysis has been undertaken using SHoG analysis. Overall, the assessments show limited effects due to the proposed development. Additional analysis which details cumulative effects on the Phoenix Gardens space show impacts are noted but they are limited and on the whole are considered acceptable given the urban nature of the site.

The analysis provided is appropriate. A number of areas for clarification were identified. These included provision of NSL contour plans (now provided), confirmation of properties studied (confirmed), inclusion of analysis for future Hotel use and cumulative daylight and sunlight studies (now provided).

---

Contents

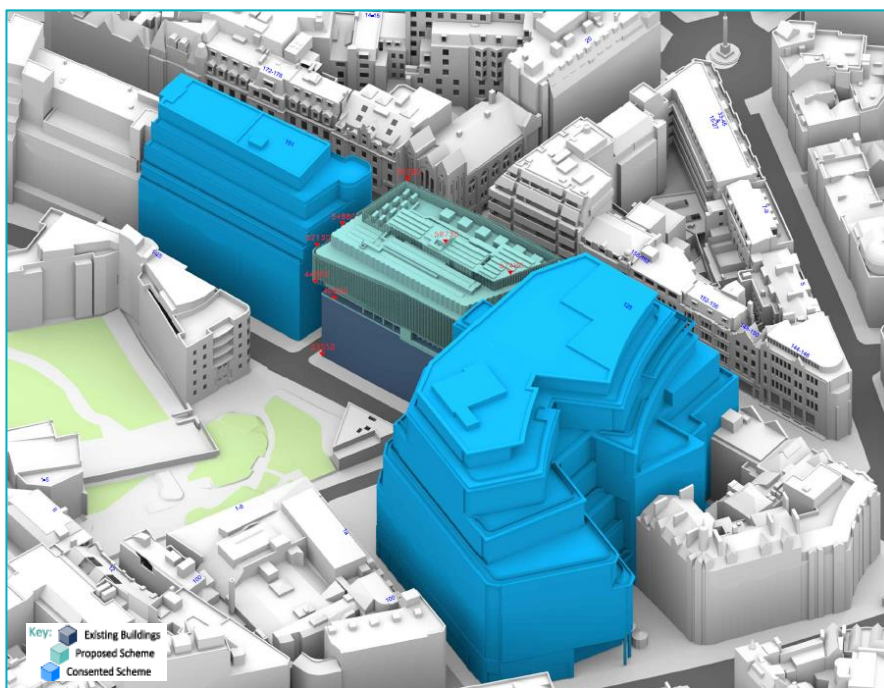
1.0	Introduction	1
2.0	Review of Addendum Daylight, Sunlight and Overshadowing assessments	2
	Daylight and Sunlight	3
	Cumulative Overshadowing Effects	6
3.0	Conclusions	7

## 1.0 Introduction

- 1.1 A planning application has been received by the London Borough of Camden for the “*part demolition, restoration and refurbishment of the existing Grade II listed building, roof extension, and excavation of basement space, to provide a theatre at lower levels, with ancillary restaurant / bar space (Sui Generis) at ground floor level; and hotel (Class C1) at upper levels; provision of ancillary cycle parking, servicing and rooftop plant, and other associated works.*” (2024/0993/P). As part of the application a Daylight, Sunlight and Overshadowing report was received by the Council.
- 1.2 A Daylight and Sunlight Assessment report authored by POINT 2 (dated February 2025) has been provided. Following commentary regarding cumulative testing an addendum note has been provided by POINT 2.
- 1.3 Lichfields have been commissioned to review the daylight, sunlight and overshadowing information and provide commentary.

## 2.0 Review of Addendum Daylight, Sunlight and Overshadowing assessments

- 2.1 POINT 2 have provided an addendum note that details the cumulative daylight, sunlight and overshadowing studies. The studies look at the cumulative effects of the proposed developments at 135 Shaftesbury Avenue, 125 Shaftesbury Avenue and 151 Shaftesbury Avenue. Additionally, following our previous review, NSL contour plans showing the results of the current vs proposed development (non-cumulative) have been issued.
- 2.2 POINT 2 have highlighted eleven neighbouring properties within their report with regards to daylight and sunlight testing. Review of the analysis results appended to the report and addendum note provide assessment results for 13 properties in total. POINT 2 have confirmed that 20 Mercer Street and 172-176 Shaftesbury Avenue have been excluded from discussion as the uses are potentially non-residential. Whilst the uses, hotel, are discussed as requiring assessment in the BRE Report, their omission from the POINT 2 discussions is not considered to be significant.
- 2.3 POINT 2 have used the VSC, NSL and APSH tests discussed in the BRE Report to undertake assessments of the neighbouring residential properties. Paragraph 6.2 of the POINT 2 Report details where internal arrangement details have been used for neighbouring properties. Contour and room arrangement plans have been provided. Review of the plans indicates that where plans were available, they have been used to determine room arrangements. Where assumed rooms have been applied the assumptions are fair and allow for commentary on the NSL data.
- 2.4 Analysis has been provided for the sunlight amenity of neighbouring amenity spaces along with additional analysis for the Phoenix Gardens area.



Cumulative studies image POINT 2 Addendum Note.

- 2.5 The addendum VSC, NSL and APSH tests applied show the daylight and sunlight amenity with the proposed development site in its current state and the amenity that would remain for each of the identified study windows, rooms and open areas with the proposed development, the proposed 125 Shaftesbury Avenue and the proposed 151 Shaftesbury Avenue properties in place (see image above).
- 2.6 The addendum information shows that of the eleven properties tested two (listed below) will remain fully compliant with the BRE Report. Our review of the assessment information provided supports this conclusion. Properties retaining BRE Report daylight and sunlight compliance:
- 5 Earlham Street, and
  - 7-9 Earlham Street.

## Daylight and Sunlight

- 2.7 Of the eleven properties discussed in the POINT 2 addendum nine see noted natural light impacts. The impacts range in significance.

### 14-18 Monmouth Street and 148-150 Shaftesbury Avenue

- 2.8 Both of these properties see minor transgressions of the BRE Report guidance in the cumulative tests. 14-18 Monmouth Street sees 1 room (R34 at fourth floor) transgress the NSL guidance. Whilst the reduction will be noticeable the retained skylight distribution is considered to be appropriate for the area.
- 2.9 148-150 Shaftesbury Avenue will see 9 windows and 3 rooms transgress the daylight (VSC and NSL) guidance. The reductions noted will see the room and windows retain above 0.7 times their former values. Whilst this is a transgression of the BRE Report 0.8 retention target the transgression is modest and although noticeable reductions, are within the expectations within urban areas.

### 166-170 Shaftesbury Avenue,

- 2.10 Daylight assessments provided show that 13 of the 28 windows (VSC) tested will comply with guidance and 6 of the 12 rooms will also see compliance (NSL). The VSC transgressions are minor and not considered to be overly significant.
- 2.11 As with the previous (non-cumulative) study, there are 6 noted NSL transgressions 3 occurring to rooms marked as living rooms and the remainder within bedrooms. As discussed in the POINT 2 report, bedrooms are considered to have a lesser significance by the BRE Report and whilst the transgressions are major are not considered to be particularly detrimental to enjoyment of the property.
- 2.12 The NSL transgressions to the living spaces are substantial with the data showing that each will see at least a 40% reduction in their current lit areas. The significance is tempered by the urban location and the relative low height of the current 135 Shaftesbury Avenue and 151 Shaftesbury Avenue buildings but is considered to fall outside of the levels of flexibility typical of urban sites. As such, the reductions will impact enjoyment of the properties, more noticeable in the rooms that currently see restricted daylight.

### **166a Shaftesbury Avenue (Chapel)**

- 2.13 23 of the 62 windows assessed for VSC meet BRE Report guidance. Whilst there are a significant number of transgressions the data shows that 28 are minor and are 11 moderate reductions. As discussed previously, the data analysis includes windows marked as serving circulation spaces. The BRE Report guidance is not typically applied to these spaces and as such the transgressions to these areas are not considered to have any significance.
- 2.14 The NSL data shows that all 8 of the 13 tested spaces will comply with guidance. The 5 transgressions are shown as 4 minor transgressions and 1 major reduction. The major transgression occurs to a space marked as being a Hall. The space currently sees very little daylight penetration, given the use of the space the effect is not considered to be detrimental to the enjoyment of the area.
- 2.15 The APSH (sunlight) assessments show that 34 of the 41 windows tested will comply with the BRE Report guidance. 4 windows will see minor transgressions and 4 will experience a major transgression. The major transgressions are noted as occurring to circulation space and as such are not considered to be significant.
- 2.16 The retained daylight and sunlight is considered to be appropriate.

### **152-156 Shaftesbury Avenue**

- 2.17 The previous non-cumulative studies show this property retains daylight compliance. However, the cumulative studies show that the combined effects will introduce noticeable transgressions.
- 2.18 VSC analysis shows that all of the 30 windows tested will transgress the BRE Report guidance. 21 windows will see minor transgressions and 9 will see moderate transgressions.
- 2.19 NSL assessments show that 3 of the 12 rooms tested will see minor transgressions with the remainder retaining BRE Report compliance.
- 2.20 Whilst daylight transgressions are noted, the retained daylight values and the urban context suggest the effects, whilst noticeable, are within the typical levels for this area.

### **1a Phoenix Street**

- 2.21 As with the previous non-cumulative assessment there are numerous transgressions of the BRE Report guidance with windows and rooms seeing notable (moderate/major) percentage reductions in their current daylight and sunlight values.
- 2.22 The VSC analysis results show that none of the 40 windows tested will see VSC values of 27% or above in the baseline conditions, i.e., compliance with the absolute target given in the BRE Report. With the proposed cumulative developments in place:
- 1 window would see a minor transgression,
  - 5 would see moderate reductions, and
  - 34 would see a major reduction.
- 2.23 NSL analysis shows that, with the developments in place:
- 13 of the 34 rooms tested see compliance with the 0.8 times former value target,



- 4 minor transgressions occur,
- 3 moderate transgressions are present, and
- 14 major transgressions occur.

2.24 APSH tests of the south facing windows show none of the 10 windows tested will meet the sunlight criteria with 3 seeing minor transgressions and 7 seeing major transgressions.

2.25 As previously discussed, the property is in very close proximity to 125 Shaftesbury Avenue and is currently heavily reliant on the natural light amenity that is present due to the undeveloped nature of the north eastern portion of this site, adjacent to Stacey Street. Also, many of the windows and rooms are beneath balconied amenity space.

2.26 As shown by the Shapley calculations provided, the majority of noted impact is due to the proposed 125 Shaftesbury Avenue property, albeit that cumulative effects also significantly contribute.

2.27 Overall, the impacts are significant and will lead to noticeable reductions in daylight and sunlight within the property. Whilst the significance is lessened by the current low values, proximity to neighbouring properties and the over reliance on open areas of the current neighbouring area the combined reductions will impact natural light enjoyment within the property.

### **1-8 The Alcazar**

2.28 The cumulative analysis shows that some windows will see both VSC and APSH transgressions. NSL data indicates that all but 1 of the tested rooms will remain compliant with the BRE Report guidance.

2.29 The rooms uses and arrangements used by POINT 2 are not based on detailed internal information. However, external observation indicates that the windows seeing effects are either secondary windows to the living spaces, where the main windows remain unaffected, or are windows serving bedrooms.

2.30 Whilst there are transgressions noted, both the levels of retained VSC and APSH and the potential lessening of significance due to room use suggest the natural light remains appropriate.

### **1-25 Pendrell House**

2.31 The cumulative analysis results show numerous daylight and sunlight effects due to the proposed developments.

2.32 VSC analysis shows that 24 of the 74 windows tested will retain BRE Report compliance, 11 will see minor transgressions, 9 will see moderate transgressions and 30 will see major transgressions.

2.33 NSL analysis shows that 17 of the 42 rooms tested will also retain compliance with the BRE Report recommendation 1 will see a minor transgression, 1 will see a moderate transgression and 23 will see a major transgression.

- 2.34 APSH analysis shows 28 of the 74 windows tested will retain BRE Report compliance, 11 see minor transgressions, 11 moderate and 23 experience a major transgression.
- 2.35 The majority of effects noted, i.e., the minor or moderate reductions, are typical in higher density areas. There are a number of major effects noted for both daylight and sunlight. Whilst the analysis shows that notable impacts on daylight and sunlight will be present their significance is reduced by the presence of balconies, the current low levels experienced and the urban nature of the area.
- 2.36 The Shapley calculations provided show that all buildings contribute to the impacts, however, it is clear that the impacts to the southeast façade are predominantly due to the 135 and 151 Shaftesbury Avenue developments. Review of this façade shows that windows and rooms currently see significant restrictions to daylight and sunlight due to their proximity to the Shaftesbury Avenue buildings and the presence of walkways. As such, whilst the reductions in daylight and sunlight values are modest they translate as significant percentage changes that may not fairly represent the experience of occupants. Overall, the retained natural light amenity with the proposed developments in place is considered to be appropriate.

### 33-45 Mercer Street

- 2.37 The cumulative assessments show that 16 of the 25 windows tested will retain BRE Report VSC compliance and that 13 of the 20 rooms will retain NSL compliance. Review of the VSC results shows that, where transgressions occur, 4 are moderate and 5 are major.
- 2.38 Review of the NSL assessment data shows 3 minor transgressions, 1 moderate and 3 major reductions.
- 2.39 The majority of windows and rooms tested are below walkways. Previous testing showed that these walkways significantly impact the current daylight values. As with the 1-25 Pendell House findings, the current low daylight values mean that any modifications translate as significant reductions.
- 2.40 Overall, whilst effects are noted the retained daylight amenity is considered to be appropriate.

### Cumulative Overshadowing Effects

- 2.41 The assessments provided by POINT 2 show that the proposed development in isolation would not introduce a transgression of the BRE Report overshadowing guidance. However, with all proposed developments in place there would be a transgression to the south west element of Phoenix Gardens.
- 2.42 The test is undertaken for the 21 March as guided by the BRE Report. An additional testing date is discussed in the BRE Report for the 21 June and the assessments provided show that the area would achieve full compliance on this date even in the cumulative scenario. Whilst the test for the 21 March date shows the area transgresses the guidance, tests provided for April to September show that the space achieves compliance with the target for at least 50% of the area to see 2hrs of direct sunlight access on the 30 March and that the sunlight amenity rises significantly throughout April, May, June, July and August. As such, the cumulative transgression noted is not considered to be significant.

## 3.0 Conclusions

- 3.1 The quantitative assessments provided by POINT 2 reference the guidelines set out in the Building Research Establishment (BRE) report “*Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice*” (June 2022). The BRE Report is intended to be advisory and does not contain mandatory standards. The introduction of the BRE Report states:
- “The guide is intended for building designers and their clients, consultants, and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design (see Section 5). In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings. Alternatively, where natural light is of special importance, less obstruction and hence more sunlight and daylight may be deemed necessary. The calculation methods in Appendices A and B are entirely flexible in this respect. Appendix F gives advice on how to develop a consistent set of target values for skylight under such circumstances.”*
- 3.2 The methodologies used to undertake the daylight and sunlight tests discussed in the POINT 2 texts are supported by the BRE Report. The proposed development is within an urban environment and as such neighbouring properties are more likely to see restrictions to their daylight and sunlight amenity before a proposed development is built. Greater percentage modifications to current/baseline values are typical where restrictions currently exist. These factors are noted in the analysis of the effects the proposed development and the cumulative schemes have on the neighbouring residential properties.
- 3.3 Overall, the proposed developments will impact negatively on some neighbouring properties but there does need to be an appreciation of the urban nature of the site and the limitation placed by the façade treatments of the neighbouring buildings when assessing the appropriateness of the retained daylight and sunlight values.
- 3.4 Overshadowing analysis shows that most of the assessed spaces are likely to comply with the BRE Report guidance.
- 3.5 The proposed development is neighboured by proposed developments. Both the proposed development and the neighbouring proposals affect a number of neighbouring properties and open spaces cumulatively. Cumulative studies show a greater impact than is present with just the proposed development at 135 Shaftesbury Avenue, however, whilst impacts are noted the majority of properties are considered to retain appropriate levels of natural light. Where major impacts are noted, there are a number of mitigating factors that must be considered.



the 1990s, the number of people in the world who are under 15 years of age is expected to increase from 1.1 billion to 1.5 billion.

As the world's population grows, the demand for food and other resources will increase. This will put pressure on the environment and on the world's food supply.

One way to meet this demand is to increase the amount of food that is produced. This can be done by using more land for agriculture.

Another way to meet this demand is to increase the efficiency of food production. This can be done by using better farming techniques.

Both of these methods have their own problems. Increasing the amount of land used for agriculture can lead to deforestation and loss of biodiversity.

Increasing the efficiency of food production can lead to the use of more pesticides and fertilizers, which can harm the environment.

One solution is to use sustainable farming practices. This means using methods that do not harm the environment and that can be continued for a long time.

Sustainable farming practices include using natural fertilizers, rotating crops, and using pest control methods that do not harm the environment.

By using sustainable farming practices, we can meet the world's growing demand for food without harming the environment.

There are many other ways to meet the world's growing demand for food. We need to find ways to use our resources wisely and to protect the environment.

Only then can we ensure that there is enough food for everyone in the world.

The world's population is growing, and the demand for food is increasing. We need to find ways to meet this demand without harming the environment.

One way to do this is to use sustainable farming practices. This means using methods that do not harm the environment and that can be continued for a long time.

Sustainable farming practices include using natural fertilizers, rotating crops, and using pest control methods that do not harm the environment.

By using sustainable farming practices, we can meet the world's growing demand for food without harming the environment.

There are many other ways to meet the world's growing demand for food. We need to find ways to use our resources wisely and to protect the environment.

Only then can we ensure that there is enough food for everyone in the world.

The world's population is growing, and the demand for food is increasing. We need to find ways to meet this demand without harming the environment.

One way to do this is to use sustainable farming practices. This means using methods that do not harm the environment and that can be continued for a long time.

Sustainable farming practices include using natural fertilizers, rotating crops, and using pest control methods that do not harm the environment.

By using sustainable farming practices, we can meet the world's growing demand for food without harming the environment.

There are many other ways to meet the world's growing demand for food. We need to find ways to use our resources wisely and to protect the environment.

Only then can we ensure that there is enough food for everyone in the world.

The world's population is growing, and the demand for food is increasing. We need to find ways to meet this demand without harming the environment.

One way to do this is to use sustainable farming practices. This means using methods that do not harm the environment and that can be continued for a long time.

Sustainable farming practices include using natural fertilizers, rotating crops, and using pest control methods that do not harm the environment.

By using sustainable farming practices, we can meet the world's growing demand for food without harming the environment.

**Birmingham**  
0121 713 1530  
birmingham@lichfields.uk

**Edinburgh**  
0131 285 0670  
edinburgh@lichfields.uk

**Manchester**  
0161 837 6130  
manchester@lichfields.uk

**Bristol**  
0117 403 1980  
bristol@lichfields.uk

**Leeds**  
0113 397 1397  
leeds@lichfields.uk

**Newcastle**  
0191 261 5685  
newcastle@lichfields.uk

**Cardiff**  
029 2043 5880  
cardiff@lichfields.uk

**London**  
020 7837 4477  
london@lichfields.uk

**Thames Valley**  
0118 334 1920  
thamesvalley@lichfields.uk

@LichfieldsUK

**lichfields.uk**