

[REDACTED]

From: Michel Foex [REDACTED]
Sent: 30 September 2014 13:36
To: Higginbottom, Peter
Cc: Planning; Pietragnoli, Lazzaro (Councillor); Callaghan, Patricia (Councillor); Cotton, Richard (Councillor)
Subject: Planning Reference 2014/4679/P : 140-146 Camden Street, London NW1 9PE
Attachments: 140930_Peter_Higginbottom_LBC.pdf; M Foex & J Bird 1a and 1b Bonny Street Daylight Review JB 300914.pdf

Dear Mr Higginbottom,

Planning Application 2014/4679/P : 140-146 Camden Street, London, NW1 9PE

Please find attached my letter of objection to this application and also as an attachment a report prepared by Point 2 surveyors with regard to the Daylight and Sunlight study prepared by Antsey Horne in support of this application. Your website provides no obvious method of attaching such material to the comments section of the application, hence my e-mail to you.

The report conclusion highlights a number of steps that the applicant should consider making bearing in mind the unreliable nature of the impact assessments made in the Daylight and Sunlight study. I would appreciate it if you could draw the applicant's attention to these steps and advise as to their intended response to these significant issues.

Kind regards,

Michel Foex.

1A Bonny Street
London
NW1 9PE

Michel Foex 1A Bonny Street London NW1 9PE

Peter Higginbottom
Regeneration and Planning Management
London Borough of Camden
5 Pancras Square
London
N1C 4AG

30 September 2014

Dear Mr Higginbottom,

Planning Application 2014/4679/P : 140 – 146 Camden Street, London, NW1 9PE


I have received notification of this planning application and wish to object for the following reasons:

- 1) Impact on access to daylight and sunlight to surrounding properties as result of this proposed development.
- 2) The height bulk and massing of the proposals on the Bonny Street side, the Camden Street frontage and the canal frontage. This is exacerbated by the design of the proposals which serves to create a vertical emphasis to the blocks of a scale inappropriate to the site's location on Camden Street and with respect to the overall local context.
- 3) Significant and negative impact on adjacent Conservation areas: the Regents Canal Conservation Area and the Jefferies Street Conservation Area on the Bonny Street side
- 4) Significant and negative streetscape and townscape impacts on Bonny Street and Camden Street, we note that the preparation of the townscape and visual impact study by CityDesigner post-dates all of the public consultation and that the public were given no opportunity to see or comment on the alterations to the design proposals as a result of this study prior to the formal submission of the proposals.
- 5) Alterations to land use classes which are a driver to the creation of the impacts listed above.

Please find attached an initial report by Point 2 surveyors in review of the Daylight and Sunlight report prepared by Antsey Horne in support of the application. This highlights some fundamental issues with the report, notably in the assessment of the impacts of the proposals as the report assumes an incorrect internal layout for my property; this despite the internal plans being downloadable on the London Borough of Camden Planning portal since October 27 2008 (Application reference 8401508, http://planningrecords.camden.gov.uk/Northgate/Planning_Explorer17/Generic/SidDetails.aspx?P=Planning%20Applications%20On-Line&TYPE=PLPlanningPK.xml&PARAM0=2368&XSLT=North_gate/PlanningExplorer17/SiteFiles/Skins/Camden/xslt/PLP_LDDetails.xslt&FT=Planning%20Application%20Details&PUBLIC=Y&XMLSIDE=&DAURI=PLANNING_).

The report conclusion highlights a number of steps that the applicant should consider making as a result of this unreliable impact assessment and I would be grateful if you would draw the applicant's attention to these steps and advise as to their intended response to these significant issues.

Yours sincerely,



Michel Foex

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Michel Foex Esq
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London
NW2 9PC

Jennie Bird
1b Bonny Street
Camden
London
NW2 9PE

September 30th 2014

Dear Sirs,

Re: The Proposed Development at 140-146 Camden Street, London NW1- Daylight & Sunlight review

I am writing in relation to our recent conversations and in particular the concerns you raised in relation to the potential Daylight and Sunlight impacts that the proposed development at 140-146 Camden Street (Planning Application Number 2014/4679/P) may have on your home at 1a Bonny Street. In addition to this, I have also considered the changes in light to 1b Bonny Street which is located directly adjacent to your demise and likewise used as a primary residential dwelling. I understand that you have concerns about the reduction in light that this application will cause to yours and your neighbours private property.

As part of this review, I am considering the detailed Daylight and Sunlight report produced by Anstey Horne dated 26th June 2014 written by Matthew Craske. It is noted that the front sections of the report make direct reference to Planning Policy as well as the Guidance (Building Research Establishment) in the area of measuring Daylight and Sunlight.

The Anstey Horne highlights some specific policy which has been adopted by Camden for which seek to protect the amenity to those neighbouring buildings which surround and face development sites. Chapter 6 of the Camden Planning Guidance specifically refers to how the council will apply the BRE Guidelines for which it is clear that both the Average Daylight Factor (ADF) and the Vertical Sky Component (VSC) will be considered in relation to daylight. I note that the Anstey Horne report excludes any calculations based on the resultant ADF within the surrounding buildings, although this may be due to the fact that both the internal subdivision as well as the room uses have not been confirmed. However, the Daylight Distribution calculation makes certain assumptions as to the room size and dimensions behind the apertures facing the development site for which calculations were provided. As such an ADF assessment could have considered the same parameters as those used in the Daylight distribution test.

Review of Results for 1a and 1b Bonny Street

The VSC and Daylight Distribution (DD) assessments have been considered as part of the daylight investigations. The changes in light produced by the implementation of the scheme proposal will result in several breaches to the BRE Guidelines. It is acknowledged that the BRE do allow for some flexibility

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in the application of the guidelines in City Centre locations, however, it might be a stretch of the imagination to accept that Bonny Street is a dense urban area – especially as the scale of buildings would be comparable to those used to generate the BRE guidelines in the first instance.

The results of the VSC assessment include a review of those windows on the front elevation of the residential properties facing the proposed site. The tabulated set of results highlight the existing and proposed levels of visible sky with and without the proposal in place. The existing daylight is considered to be good and as I understand, one of the primary reasons why you and your neighbour have decided to live there.

1a Bonny Street

The VSC results produced by the scheme proposal include four breaches of the guidelines to eight windows assessed i.e. 50% pass rate. I am unable to confirm the location of these impacts as the report excludes any window map identification information although it is noted that drawing ROL_6842_06_101 (located in Appendix G of the Anstey Horne report) include plans of the rooms with some basic window locations. This also illustrates that certain windows located on the first floor have been omitted during the assessment.

It is noted that, two of the window results appear to include skylights/ roof lights (given the significant VSC in the existing scenario), although the report does not mention this nor provide any additional information to support this suggestion.

The DD results include a review of three rooms – one located on each level starting at grade. Two of the rooms assessed breach the guidelines i.e. a pass rate of 33% has been recorded. The supporting contour plots (Appendix G of the Anstey Horne report), highlight the location and assumptions as to the internal subdivision of the rooms behind those apertures facing the site. This does not, however, reflect the real position and therefore the extent of the daylight assessment is totally unreliable. The two images below (Plate 01 and Plate 02) highlight the true internal arrangement and dimensions of 1a Bonny Street. Note that there is both a kitchen and living room located on the ground floor.



PLATE 01 – GROUND AND FIRST FLOOR OF 1A BONNY STREET – INTERNAL MEASURED SURVEY



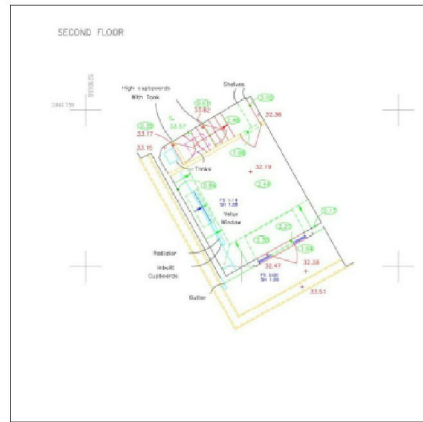


PLATE 02 – SECOND FLOOR OF 1A BONNY STREET – INTERNAL MEASURED SURVEY

The sunlight results include a review of the Annual Probable Sunlight Hours (APSH) for each of the windows overlooking the site. This information has been supplied on a per window basis although it is acknowledged that the BRE Guidelines (2011 edition) allow for a consideration as to the room also. The latter was not available in the report and therefore only the individual aperture has been considered.

The changes to the sunlight are significant especially given the existing availability. The BRE do suggest minimum standards although a 100% loss of sunlight to one window (W1/20) and a 66% light loss to window W3/20 could be considered to be outside the intention of the BRE Guidelines.

1b Bonny Street

The VSC and DD assessment results appear to be in line with the BRE's accepted 20% reduction from the former value. However, the DD assessment works on the assumptions as to the internal subdivision and thus there is a degree of accuracy that needs to be considered.

The APSH assessment for Sunlight indicates very good retained summer sunlight although the significant decrease in the winter sun will be noticeable to the occupants occupying the building.

Summary and Conclusions

Point2 Surveyors have undertaken a review of the Anstey Home Daylight and Sunlight report for the proposed development at 140-146 Camden Street. The report includes a review of both the VSC and DD methods of daylight assessment although not the ADF. Certain assumptions have been made as to the internal subdivision of 1a and 1b Bonny Street although this does not reflect the true situation. The daylight changes recorded are a clear breach of the BRE Guidelines.

The Sunlight (ASPH) assessment highlights significant breaches of the winter sun where the limited availability has been further reduced by the implementation of the proposed scheme. The light alterations are considered to be outside the intention and application of the BRE guidelines and a product of the size and scale of the scheme proposal. Given the relatively modest size of the residential

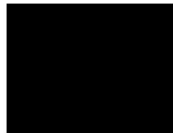


buildings along Bonny Street, it would not be unreasonable to expect a proposed development to follow the same scale thus limiting the changes in light to those neighbouring buildings that surround and face the site. It is therefore requested that further information be provided including:

- An update and review of the Daylight Distribution assessment based on the real internal layouts for both 1a and 1b Bonny Street;
- That the Average Daylight Factor assessments be undertaken (as per Camden Planning Guidance) to appreciate the daylight availability within the room space behind the apertures;
- That a cutback assessment be undertaken to the proposal in order to respect the Vertical Sky Component to 1a Bonny Street;
- That a cutback assessment be undertaken to understand the extent of the scheme massing which is causing the significant changes to the winter sunlight to 1a Bonny Street.

It is only when these additional studies are undertaken that the full extent of the daylight and sunlight position can be understood and an informed decision at planning can ultimately be made.

Yours sincerely



Justin Bolton
Director
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