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Mr D Fowler Principal Planner – Regeneration and Planning London Borough of Camden Pancras Square 5 Pancras Road London N1C 4AG

Dear Mr Fowler,

Our Ref: AR/sev/17106

17 March 2017

# Application 2016/5202/P-125 Shaftesbury Avenue, London WC2 Daylight & Sunlight Review

Further to my report dated 27 February 2017, I have received further supplementary information from the applicant's daylight consultants, GIA, which I have passed on to you as I do not believe it was sent to you at the same time. I note that it has recently been sent to you by GVA. I have reviewed that additional information and thought it would be helpful to provide an addendum report giving my opinion about that. The further information is in relation to the impact of the development on 1A Phoenix Street. In my report, I advised that I consider the impact on 1A Phoenix Street to be major adverse because of the impact on light that will be caused by the development.

GIA have provided additional analysis information to support their contention that the actual reduction in daylight and sunlight caused to 1A Phoenix Street is sufficiently small that it should not be considered to be major adverse. In addition, that the analysis should be reviewed in comparison with a notional mirror massing on the current open land that forms part of the development site rather than simply against the light received over the open site itself.

## Mirror Massing

In relation to the mirror massing, GIA rely on an option permitted by the BRE Guidance that where a development site is open land or of a low height that is not in keeping with the prevailing urban massing in the area. In such a case it may be appropriate to establish the levels of daylight that would apply with a notional massing on that site that would match the prevailing urban grain and then assess the impact of the proposed development in comparison with that notional massing. This is being argued for the open land to the east part of the application site and it is the case that the eastern end of Phoenix House receives good levels of daylight over that land. GIA have therefore undertaken calculations based on a massing on that plot to a height of 41.053m AOD. This is effectively comparable with the height of the Phoenix Theatre and slightly higher than the existing building at 1A Phoenix Street.

Based on that analysis, GIA have provided a results table for Vertical Sky Component (VSC) and this shows that five of the living rooms and fourteen of the bedrooms or other rooms will experience an improvement in VSC by comparison with the mirror profile. This therefore shows that, if the application site was developed to its full area with massing that is comparable with the generic urban grain, then there would in fact be an improvement in daylight for the current scheme against that notional massing. The scheme proposal does also still cause losses of VSC of more than 20% from existing to a small number of bedrooms at the western end of the property where the mirror massing has little effect.

Therefore, if the mirror massing approach is accepted as a reasonable approach to assessing the appropriate development massing on the application site, then this does show that the proposed development is of an appropriate scale compared to such notional massing.

### Retained Daylight Levels

GIA have provided some additional analysis of the actual change in daylight, principally by reference to the ADF results, identifying that the rooms left with the least light will only experience an absolute change in ADF of 0.2% or 0.3%. The comments in my first report are still relevant about the reduction in light but it is the case that these rooms will be left with levels of daylight that are in fact better than other rooms in the property where the daylight standards will be met, because they would not themselves experience a 20% reduction in daylight.

#### Modifications to ensure Daylight and Sunlight Compliance

GIA have provided a 3D model view which shows the areas of massing of the application scheme that need to be removed if full daylight and sunlight compliance were to be achieved. This is a substantial reduction in area and I suggest that it is appropriate for planning officers to consider the desirability of the scheme as proposed and whether such radical changes are needed in order to ensure full compliance with BRE standards.

#### **Conclusion**

If the mirror assessment is considered to be an appropriate method of establishing the acceptable development envelope on the application site, then the analysis based on that shows that the scheme proposal would not have a major adverse impact if the mirror scheme were to be treated as the existing and daylight entitlement. In that case the impact would be negligible to minor adverse as failures are balanced by the substantial number of living rooms which will have better light once the development is complete than they would have with the existing building and the mirror massing.

If the mirror massing is not considered to be an acceptable method of assessment then it is the case that the reductions in daylight that will be caused are very small in actual terms although they are large in percentage terms and that there would be a requirement for a disproportionate reduction in the building massing in order to achieve full compliance or even materially improved compliance. This is because the balconies at 1A Phoenix Street are a primary obstruction to daylight in their own right.

In conclusion, therefore, any material additional development of this site that infills the open area to the east and increases the massing on Phoenix Street will have a disproportionate impact on daylight to 1A Phoenix Street. This is because of the narrow width of the street, exacerbated by the balconies overhanging the windows cutting sky visibility from above. The levels of daylight that will be left are levels that are currently prevailing to other parts of that building already and it is the better lit, although not well lit, rooms that will experience the larger reductions.

Yours sincerely,

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