



David Fowler
Principal Planner
Regeneration and Planning
5 Pancras Square
London N1C 4AG

14th November 2017

Dear Mr Fowler,

Re: Proposed redevelopment at 294-295 High Holborn & Lincoln House – Daylight and Sunlight

I write to you in connection with the proposed redevelopment at 294-295 High Holborn (Application Reference: 2017/1827/P) in respect of its potential impact upon my client Aberdeen Asset Management Limited's property, Lincoln House, located immediately to the east of the development site.

As you will be aware Aberdeen Asset Management submitted two objections to the Proposed Development dated 27 June 2017 and 31 August 2017. The principal areas of concern expressed were the residential amenity, particularly daylight levels received by habitable rooms, and the potential prejudicial effect of the proposed development on Lincoln House.

As a result of these objections the Applicant, in respect of 294-295 High Holborn, has submitted to the London Borough of Camden, a revised set of planning drawings, prepared by Independent Architects, and an update to Watts Daylight Analysis Report (dated 30 October 2017).

Whilst Watts have now assessed the internal daylight availability to the proposed residential units in the context of my client's proposed extension works for Lincoln House, which we consider to be an appropriate method of analysis, a number of concerns remain:

1. The revised scheme drawings have only amended the layout configurations slightly, changing the uses of some of the rooms at 3rd and 4th floor level from bedrooms to studies. There are no other changes to the layouts. This I would imagine is in reaction to the concerns our client has previously raised in respect of overlooking and privacy with windows proposed directly on the boundary and facing onto the existing commercial office space at Lincoln House. However, it is unclear as to why they have retained the bedrooms at 5th and 6th floor levels.
2. Whilst the revised layouts have changed the use of some of the bedrooms to studies, Watts have not included those studies within their revised assessments. Studies are still considered to be habitable spaces and therefore have a requirement for natural daylight, so it is unclear why these have been omitted from their analysis. Our clients' concern is the presence of habitable windows directly on the boundary of the development.
3. It is unclear from Watts appended plan drawings whether they have accurately measured the internal daylight levels with the privacy screens in place on the windows overlooking the Lincoln House site. This was a query that was raised in respect of Watts' previous report and has not been addressed. The inclusion of the privacy screens will further worsen the daylight received to habitable rooms behind those windows, further below the minimum standards.

4. The daylight standards for the proposed residential bedrooms would not meet the recommended minimum standards. Watts' overall conclusions are that there is an expectation for lower daylight levels given the location of the development in a dense urban environment, and justify the quality of light within the proposed dwellings by reference to the fact that the main living kitchen dining rooms will all achieve the recommended internal daylight levels.

With Aberdeen Asset Management preparing their own planning application for the redevelopment of Lincoln House, they are understandably concerned about the introduction of habitable residential windows along the eastern boundary of their site, as currently proposed by the Applicant of the 294-295 High Holborn scheme.

By reference to the conclusions of Watts' updated Daylight Analysis Report, my client is seeking comfort from London Borough of Camden that the daylight and sunlight availability to the bedrooms and studies within the Proposed Development that directly overlook the Lincoln House site will not present a constraint to the future development potential of the Lincoln House site.

Yours sincerely



Matt Harris
Associate Director
For and on behalf of Point 2 Surveyors Ltd

