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Our Ref: 18413/sg/SG

Date: 14th August 2018

Laura Hazelton
Planning Officer
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London WC1H 9JE

Dear Laura Hazelton,

Planning Reference: 218/0910/P
The Proposed Redevelopment of 20-23 Greville Street, London EC1N 8SS

We have been instructed by Mr Robert Wilson of No's 1 and 7 Bleeding Heart Yard as well as 19 Greville Street to advise them in relation to potential daylight, sunlight and overshadowing matters relating to the potential redevelopment of the 20-23 Greville Street site.

You will be aware of our client, Mr Wilson's previous objections to the proposed development for the 20-23 Greville Street by Tyler Goodwin of Seaforth Land which presents our client with substantial concerns as one of the primary neighbours with adjacent properties bordering immediately to the south and also to the west of the development site.

Mr Wilson owns 7 Bleeding Heart Yard as well as number 1 Bleeding Heart Yard and also 19 Greville Street which will all be substantially affected by the development proposals by way of access to light which is very beneficial to the occupants and users of the buildings. The development proposals will block this access to natural light substantially which will materially affect the day to day use of the spaces.

It is noted that from the planning submission papers that GLHearn have produced a daylight and sunlight report as part of the planning submission. However, their daylight and sunlight report does not include an assessment of all of our client's buildings which are going to be among the most affected neighbouring properties within the vicinity of the site.

On review of the findings of the GLHearn Report it is noted that they have included a mixture of residential and commercial properties (for example the Upper Floors of 7 Bleeding Heart Yard only which is in residential use but not the lower commercial floors. This is despite the inclusion of 136-138 Safron Hill and 3-5 Bleeding Heart Yard which are both fully in commercial use. Furthermore, where there are neighbouring buildings which contain mixed use accommodation of residential and commercial only the residential elements have been considered. Clearly this does not represent a uniform approach for all neighbouring properties considered and there is no explanation for the selective process that have been considered as opposed to those that have not. This is difficult to comprehend given the proximity of our clients properties and the almost certain material effects that our clients properties, in particular 19 Greville Street which has been completely omitted from the assessment, will experience as a result of the development proposals. 6 & 6a Bleeding Heart Yard has also been completely omitted from consideration despite potentially being one of the more substantially affected neighbours. We fail to understand the selective process of assessing some neighbouring properties and not others regardless of their uses.

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The GLHearn report concludes from their analyses that the proposed scheme will have only a 'negligible impact' on daylight & sunlight amenity received by neighbouring properties. This is despite reductions well in excess of the BRE Guidelines to both the primary VSC assessment as well as the secondary daylight distribution study to 3-5 Bleeding Heart Yard which are considered to be moderate adverse in themselves. With these adverse impacts and the complete omission of 19 Greville Street from the assessment which will undoubtedly experience adverse impacts the conclusion of only a 'negligible impact' is very hard to accept and agree with.

Whilst it is recognised that the BRE Guidance document on daylight and sunlight is primarily set up to protect residential amenity paragraph 2.2.3 of the document clearly states the following:

[The guidelines may also be applied to any non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices]

On behalf of our client, we respectfully request therefore, that as a primary feature of the Bistro at 7 Bleeding Heart Yard (ground and first floors) as well as the east facing elevation of 19 Greville Street (all floors) which will be substantially affected by the proposals that a daylight assessment of these buildings should be considered which will demonstrate, as we expect, that there will be a detrimental loss of light well in excess of the BRE Guidelines. We therefore strongly object to these proposals in daylight and sunlight terms and at the very least request that the developer provide an additional assessment of the detrimental impact that is believed our clients properties will experience in daylight terms for further review.

In the possible event that this proposed development is given consent (against our clients wishes) we are also asked to firmly place on record our clients alarm as to the loss of light and confirm that in no way do they consent to this interference of their right of light and they fully reserve their position in respect of taking all necessary action to prevent the adverse effect upon their properties.

Yours sincerely



Stuart Gray
Partner

