

Our ref: GH/002080

Your ref: 218/0910/P

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

12 September 2018

Dear Ms Hazelton

Planning Reference – 218/0910/P

Re: The Proposed Redevelopment of 20-23 Greville Street, London EC1N 8SS

With reference to representations made by Mr Wilson in relation to the above planning application, we have reviewed the issues raised by Mr Wilson's appointed consultant, Delva Patman Redler (DPR) in their letter dated 14 August 2018.

DPR have undertaken a review of our daylight and sunlight report dated December 2017 ('GL Hearn's Report'), and we have provided below further clarification to each of the points raised in DPR's letter;

Scope of daylight and sunlight assessment according to BRE Principles

First and foremost, it is important to consider that the British Research Establishment publication 'Site Layout Planning for Daylight and Sunlight' (the 'BRE Guide'), on which our assessment was based, states by way of the introduction;

"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; the aim is to help rather than constrain the designer."

The BRE Guide is predominately centred on protecting the daylight and sunlight amenity to habitable rooms within residential properties where it is most likely to be enjoyed, but makes provisions for some non-residential building "where the occupants have a reasonable expectation for daylight", as highlighted in DPR's letter.

Our interpretation of 'a reasonable expectation' in a commercial context is a requirement for a certain level of daylight and sunlight amenity for the operational purposes of an organisation; where the loss or reduction of such levels would be at the detriment of the organisation's ability to function as required.

In our professional opinion, examples of this would include an artist's studio or an architect's practice, where natural light is required for the production, inspection and presentation of drawings and materials. This view is reflected in GL Hearn's Report, with the inclusion of commercial properties believed to be put to the above use, and these properties are referenced in DPR's letter.

Referring to our methodology for the inclusion of such properties in GL Hearn's Report, DPR state in their letter;

“there is no explanation for the selective process that have been considered as opposed to those that have not”;

We consider GL Hearn’s Report addresses this in paragraph 4.5, which states;

4.5 “A number of neighbouring offices are currently occupied by architecture firms or are in use as design studios. Whilst the guidance given in the BRE report is predominately intended for residential properties, the principles can be also be applied to some commercial properties where the occupants are considered to have a reasonable expectation of daylight and sunlight. We have therefore considered the impact on neighbouring commercial properties where the potential exists for the occupiers to be adversely affected.”

In their letter, DPR request further properties are considered for potential daylight and sunlight effects. Each property listed is dealt with in turn below;

1. 7 Bleeding Heart Yard

- 1.1. Our submitted assessment of this property considers the residential unit at second and third floor only.
- 1.2. It is not considered that daylight and sunlight is required for the operational use of the Bistro at basement and ground floor level, or the restaurant which appears to be located at ground floor in 3-5 Bleeding Heart Yard (the windows for which were included in our original assessment as it was believed they served an artists studio / workshop).
- 1.3. Nonetheless for arguments sake, a feature on Google Maps allows us to virtually enter the ground floor bistro in 7 Bleeding Heart Yard. This shows the primary source of daylight to be a large skylight that again, is located on the opposite side of the building to the application site. The windows facing onto Bleeding Heart Yard are in-fact sheltered beneath a large red canopy that blocks a significant amount of daylight to these windows currently.
- 1.4. We have obtained a floor plan for the first floor of 7 Bleeding Heart Yard from the London Borough of Camden’s online planning database. This shows the first floor to be in use as a jewellery workshop and office, rather than the Bistro stated in DPR’s letter. We have provided this plan in Image 1 below (windows on the south side of the plan are those facing onto Bleeding Heart Yard).

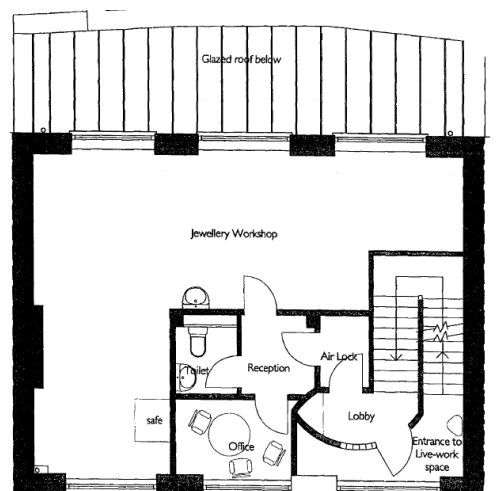


Image 1 – 7 Bleeding Heart Yard First Floor Plan

- 1.5. The plan shows one of the three windows at first floor facing the application site serves a dual-aspect jewellery workshop. Another window serves a small office and the remaining window serves a lobby.
- 1.6. Whilst it is debatable whether a jeweller's workshop would be considered as having 'a reasonable expectation' of daylight and sunlight amenity for operational purposes, we have prepared additional analysis for this space for completeness. We have undertaken Vertical Sky Component (VSC) and Annual Probable Sunlight Hours (APSH) assessment for this window and, for the avoidance of doubt, the adjacent office window.
- 1.7. As shown in Table 1 below, the office window (W5) remains above 0.8 times the existing value, in accordance with BRE daylight recommendations. The workshop window facing the application site (W6) would retain a VSC value 0.77 times the existing value, narrowly below the BRE baseline of 0.8 times. The effect on the other three windows serving this room would be negligible, and all three would remain well within the BRE guidelines.

7 Bleeding Heart Yard												
First	R2	Commercial	Office	W5	Existing	25.16	0.81	258°	35	0.94	3	1.00
					Proposed	20.47			33		3	
	R3	Commercial	Jeweller's Workshop	W6	Existing	23.30	0.77	258°	37	0.91	7	1.00
					Proposed	18.02			34		7	
				W3	Existing	5.64	0.99	79°N		*North*		*North*
					Proposed	5.63						
				W2	Existing	7.29	0.99	79°N		*North*		*North*
					Proposed	7.26						
				W1	Existing	11.57	0.99	79°N		*North*		*North*
					Proposed	11.53						

Table 1 – 7 Bleeding Heart Additional Assessment Results

2. 19 Greville Street

- 2.1. Floorplans of this property obtained from the London Borough of Camden's online planning database show a dual-aspect pub and bar area at ground floor – the space immediately behind the pertinent windows facing the application site is in-fact a circulation space and stairwell, with the main pub and bar area set further back on a slightly raised floor. Wood panelling separates the main bar area from the stairwell, partially blocking the light from these windows.
- 2.2. A window located further along the east-facing elevation (closest to the proposals) serves a separate enclosed stairwell.
- 2.3. Similarly at first floor is a dual aspect bar area, referred to on the plans as a 'members room'. The window closest to the additional massing of the proposals again, serves a separate enclosed stairwell.
- 2.4. As with restaurants, drinking establishments are not generally considered as having a specific requirement for daylight and sunlight amenity.
- 2.5. The second and third floor windows are shown on plan to serve an additional dual-aspect 'members room', stairwells and office space. Again, such spaces are not typically considered to have a requirement for daylight and sunlight amenity.
- 2.6. Further assessment for this building, as per the request in DPR's letter, is not deemed necessary.
- 2.7. 1 Bleeding Heart Yard adjoins 19 Greville Street and is also owned by Mr Wilson. DPR's letter lists this building as one of those to be "substantially affected by the development proposals."

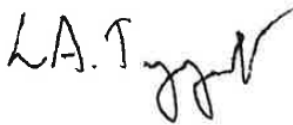
2.8. Floorplans show that the windows on the elevation facing the proposals all serve circulation spaces / stairwells, and would not be considered to have a requirement for daylight and sunlight amenity.

3. Significance of Effect

- 3.1. DPR's letter disputes the concluded significance of effects on the basis that reductions in daylight below BRE recommendations would occur to 3-5 Bleeding Heart Yard; DPR would consider such reductions to be 'moderate adverse'.
- 3.2. It should be noted that the numerical values provided in the BRE guide are intended for guidance purposes only and are just one factor in determining the significance of effects, alongside, for example, the use of the rooms and the daylight and sunlight amenity requirements of the occupants.
- 3.3. With the above in mind, we maintain that the daylight reductions to 3-5 Bleeding Heart Yard, whilst below the BRE recommend numerical values, would not affect the operational use of this commercial building; particularly to the ground floor which we now understand to be in use as a restaurant.

We trust that the above clarifies DPR's comments, and that this sufficiently demonstrates that the proposals of application 218/0910/P would not cause harm to neighbouring daylight and sunlight amenity, in accordance with Policy DP26 of Camden Council's Local Development Framework.

Yours sincerely



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