

By email to: planning@camden.gov.uk

London Borough of Camden
5 Pancras Square
London
WC1H 9JE

13 September 2019

Dear Sofie Fieldsend,

Application Reference No. 2018/0094/P
Proposed Development at 1 Lily Place and 39 Saffron Hill, London EC1N 8YJ
Impact on 41-43 Saffron Hill

We are appointed by the leaseholders of 41-43 Saffron Hill, following concerns that the proposed demolition of existing mansard and erection of a sheer third floor and modern mansard to 39 Saffron Hill and single storey flat roof extension to 1 Lily Place will impact upon the daylight and sunlight receivable by their property.

The Building Research Establishment (BRE) "Site Layout Planning for Daylight and Sunlight: a good practice guide" 2011 by PJ Littlefair provides guidance for the planning department to consider.

The introduction to the BRE guide at 1.1 suggests that "people expect good natural lighting in their homes and in a wide range of non-domestic buildings. Daylight makes an interior look more attractive and interesting as well as providing light to work or read by. Access to skylight or sunlight helps make a building energy efficient; effective daylighting will reduce the need for electric light, while winter solar gain can meet some of the heating requirements."

We understand that the applicant has instructed Delva Patman Redler LLP to undertake a daylight and sunlight study. The results of which indicate a reduction of light to a number of windows and rooms that amounts to breaches of the BRE guidelines:

- Kitchen windows at the first and second floor will experience a greater than 20% reduction in VSC as a result of the proposed development. Within the study, it is stated that the percentage loss appears magnified due to already low existing levels of VSC. However, at 10.6% and 13.43%, we would consider these to still be reasonable existing figures and that the percentage loss does not appear artificially inflated. We suggest the level of loss is in fact a reflection of the level of proposed massing
- The ground floor flat kitchen will also experience a greater than 35% reduction to its daylight distribution

- Living room windows at the ground and first floor also suffer a significant loss to the amount of annual probable sunlight hours they receive

We understand the daylight and sunlight study has been prepared without a site visit to inspect the internal arrangements of our client's property. You will therefore appreciate we are unable to confirm to our clients that the results are an accurate interpretation of the anticipated light loss.

We would request that no decision in favour of the application is made until the applicant instructs their surveyor to visit our client's property to obtain the internal layout and measurements, amends their computer model where necessary and re-runs the BRE daylight and sunlight tests. We would also request that a copy of the computer model and analysis be forwarded to us so that we can advise our clients accordingly on the accuracy of the results. We will be happy to liaise with our clients to arrange access for the applicant's surveyor to visit so they can gather the necessary internal measurements for the assessment.

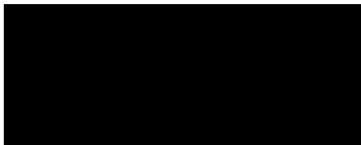
In addition to planning considerations, it is useful to assess the risk of any potential civil action from the outset and mitigate any future costs which could be incurred defending a claim. Our clients are disappointed that they have been obliged to respond negatively to the application, but feels compelled to oppose a development which they consider will have such an oppressive and overbearing impact on the way they enjoy their properties.

In summary, we request that no decision is made in favour of the application until we are satisfied that the proposal complies with both the BRE guidelines and the civil legal rights of light criteria.

Please acknowledge receipt of this letter and respond accordingly with your assurance. Should you wish to discuss any aspect please do not hesitate to contact me.

I look forward to hearing from you shortly.

Yours sincerely,



Alice Cook BA (Hons)
Right of Light Surveyor

