



Our Ref: AR/sy/19517

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20 November 2019

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Kristina Smith  
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London Borough of Camden  
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Dear Sirs

**Re: 2019/5075/P – 46 Inverness Street, London NW1 7HB**



The first issue is that the Waldrams report identifies that the computer analysis has not been based on accurate & detailed survey information. It has been based upon a generic 3D survey model with relevant details such as the elevational information of the adjoining properties, including window sizes and positions, have been estimated from brick counts and photographs. We would therefore request that the applicant be required to commission an appropriate measured survey and provide an updated report with more accurate results.

Secondly, the applicant has undertaken a shadow analysis showing the impact on the gardens to my clients' properties. The report claims compliance with the sunlight standards, primarily because the levels of direct sunlight to the gardens are already so low, that any changes would be incapable of being recorded, in the case of [REDACTED], or would be within the required standards in the case of [REDACTED]. However, whilst the Building Research Establishment guidelines give recommendations for assessing shadows to gardens and amenity areas on the basis of how much of the garden is free from shadow on 21 March, planning policy in the London Borough of Camden does not simply rely on that. In a dense urban area such as this, it is important for members of the Planning Committee to be able to understand the real impact on sunlight to gardens. For these houses any sunlight that is received by the gardens is of particular value, in making the garden an attractive place for occupants to make use of. It is not sufficient for the committee to only be shown the area of permanent shadow on 21 March when it is clear that the gardens currently receive much better levels of direct sunlight throughout the summer months, and at a level that makes the gardens pleasant sunlit spaces for the occupants to make practical use of. Without an analysis showing the real additional shadowing that will result in other months, especially late spring, summer and autumn months, the real impact on amenity cannot be understood.

The application site is a low level building located directly to the south of these gardens and the direct sunlight in the middle of the day will pass over the site to the gardens [REDACTED]. This is a historic feature of the immediate area that reflects the close proximity of the application site to the houses at the rear, where there is no rear garden to provide a natural separation and allow access of daylight and sunlight. There is currently direct sunlight through that existing gap between 10am and 2pm. In the spring and autumn the new building will clearly obstruct the sun and cast a shadow across both gardens due to its height and proximity to No24. In the summer the sun may be high enough to direct light part of the garden of [REDACTED] but the proposed building will be tall enough to cast a substantial shadow on the garden [REDACTED]. This is a substantial adverse impact.

Also at:  
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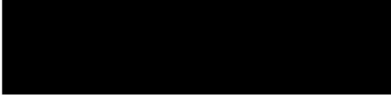
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Kristina Smith  
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I therefore request that the applicant be asked to provide a drawing showing the actual course of shadow for every month between March, and September. This will show the transitory shadow, and will identify where sunlight can actually be received in the garden, in order that a fair & balanced decision can be made about whether the increase in shadowing that will be caused can be considered to be an acceptable loss of amenity or not.

Yours sincerely



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