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Ms K Henry  
Senior Planning Officer  
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London Borough of Camden  
5 Pancras Square  
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Dear Ms Henry

**St Pancras Campus, St Pancras Way, London NW1  
Daylight and Sunlight Review Update**

Thank you for the updated daylight and sunlight report provided by Point 2 Surveyors and dated August 2019. I have now reviewed this document and can make comment on it as an update to my previous report submitted on 18 July 2019.

The daylight and sunlight report is substantially identical to the interim report that was reviewed in July with two key changes. There is a new section 8 which responds to my previous report. There is also additional wording in the report text for 124 Pratt Street, again to answer queries raised in my previous report. Other than that, the text appears to be the same as the previous report, including the conclusion, apart from re-numbering of the paragraphs after section 8.

***Appropriate Standards***

In my previous report I identified that the Point 2 report did not set significance criteria for daylight and sunlight and suggested criteria that could be used to determine the significance of the impacts of loss of light. Point 2 identify that such criteria are generally used in environmental impact assessments rather than the more simply daylight reports and I agree that such criteria are primarily for the guidance of the planning committee.

Point 2 have provided their own significance criteria which are effectively the same as mine except they set a benchmark level of retained VSC of 18% VSC above which any impact; no matter how large, would be considered to be minor. Moderate and major adverse impacts would only be considered to be caused when the retained VSC is reduced to below 18%.

I do not agree with this alternative criteria as it does not adequately relate to the VSC values set out as guideline standards by the Building Research Establishment. However, I suggest that it is open to the Committee to consider this suggested alternative criteria when making a decision on this application if the Committee considers that a retained VSC of 18% is sufficiently consistent with typical levels of VSC in the immediate area such that it would not be appropriate to consider a reduction in daylight as anything more than minor adverse where windows are left with a VSC above 18%.

My preference would be to maintain the criteria I have suggested but for the Committee to be aware that a retained VSC of 18% would generally be consistent with typical VSC levels in a dense urban location such as this.

**124 Pratt Street**

In my previous report I identified that the development will cause a major adverse impact to 124 Pratt Street. The latest Point 2 Surveyors' report provides further information about the building emphasising that they have only been able to obtain limited information on the internal layouts and that they believe that the windows on the elevation facing the site are more likely to serve secondary habitable rooms with the main habitable rooms being on the opposite elevation not affected by the development. However, whilst having to estimate room dimensions would have an impact on the NSL results, it does not make any difference to the VSC results which are calculated on the face of the window. Therefore, it is still the case that the impact is major adverse, however, it is appropriate for the Planning Committee to consider whether this impact is likely to be to secondary windows such as bedrooms, when considering whether this impact is material in determining whether to grant planning consent.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Alistair Redler', written in a cursive style.

**Alistair Redler BSc FRICS**

**Senior Partner**

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