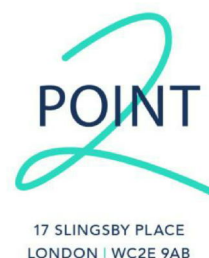


Allend Sacbucker
SM Planning
80-83 Long Lane
London
EC1A 9ET



13th February 2023

Dear Allen,

RE: THE PROPOSED DEVELOPMENT AT 52 TOTTENHAM STREET AND OVERSHADOWING TO 30 CLEVELAND STREET AMENITY SPACES

I write further to our email exchange and the request to extend the overshadowing analysis to the amenity spaces serving the neighbouring 30 Cleveland Street. As you are aware, Point 2 previously extended the detailed technical analysis to consider 30 Cleveland Street as part of the Daylight and Sunlight assessments within the surrounding context. This was undertaken in accordance with the BRE Guidelines, guidance adopted and recognised by the London Borough of Camden within their Development Plan.

The BRE Guidelines recognise that there is a greater expectation for natural light when compared to a non-domestic/commercial building and thus it is common for Daylight and Sunlight assessments to consider residential properties in isolation. In respect of surrounding amenity spaces, the same approach is common within the technical assessments and a judgement is made that considers the use and purpose of the neighbouring amenity space and its expectation for light availability. It is generally accepted that spaces that are designed for outdoor leisure and recreation carry a greater expectation for sunlight when compared to outdoor break areas.

Notwithstanding standard practice, Point 2 have extended the overshadowing analysis to consider the terrace amenity spaces that serve the commercial 30 Cleveland Street property. In accordance with the BRE Guidelines, the Sun on Ground (SoG) analysis has been undertaken to establish the sunlight availability to the defined terraced spaces. The BRE Guidelines outline a criteria that 50% of the defined area should receive at least 2 hours in sunlight on March 21st (the BRE's test date) or record a change no greater than 0.8 times its former value.

The results show that these spaces do not meet the BRE's target value on March 21st. Although, it should be noted, however, that the SoG assessment demonstrates a 'cliff-edge' analysis and records the % surface area that receives 2 hours in sunlight and by deduction % of surface area that do not. The areas not identified as 'passing' are not necessarily left in darkness but instead receive less than 120 mins on March 21st. The results of the extended analysis can be found within Appendix 1 on P1704/SHA/01-02.

Using software that allows the sun's path to be tracked on March 21st, the results show that the outdoor terrace areas will receive moments of sunlight between 12:00pm – 13:30pm and falls during the time of the day when lunchtime is commonly taken.

To conclude, Point 2 have extended the overshadowing analysis beyond common practice to consider the commercial 'outdoor break spaces' at 30 Cleveland Street. Notwithstanding the outdoor areas falling short of the BRE's target value, it is arguable whether these spaces warrant the same consideration when compared to a residential garden. Whilst the results demonstrate shortfalls below the BRE's target for the SoG assessment, these spaces are unlikely to be left in darkness throughout the day. Sun path software supports this and shows that during the lunch hours (12:00pm – 13:30pm) the outdoor spaces will have exposure to direct sunlight.

Yours Sincerely,



Justin Bolton
For and on behalf of Point 2
Partner



Appendix 1



