

21 March 2018

Dear Sir / Madam

RE: 15 BLUELION PLACE, LONDON, SE1 4PU**Application: 17/AP/4796****Proposal: Redevelopment of the site comprising the demolition of t its replacement with a 5-storey office building.****Planning Sub-Committee A, 26 March 2018, 19:00**

On behalf of the owners of the immediately adjoining property to the Site, Unit 16 Blue Lion Place, we provide the following written representations and would be grateful if these could be placed before the Committee for consideration please.

1. We are very pleased the Electoral Reform Society has bought the place and will be our neighbour. We are taken aback, though, by their ambitious plan which does not take sufficient account of several key factors.
 2. We refer to the objections to this application previously submitted in writing by the occupiers of the immediately adjoining property, Unit 16 on 10 February 2018. We stand by those objections, which we feel are not adequately dealt with either by the applicant's response or by the officer's report.
 3. **The proposed development is out of keeping with the existing properties in Blue Lion Place, breaks the roof line of the live/work unit block and, particularly when viewed from the courtyard, will be an overly dominant structure significantly reducing both daylight and sunlight.**
 4. We have obtained our own daylight and sunlight assessment of the impact of the proposed development on Unit 16 and can therefore add further detail. We attach a copy of the assessment report. We urge Committee members to read the whole of the report, which can be summarised as follows:
 - 4.1 *"The results of our examination indicate **the proposed development at Unit 15 fails to fully comply with BRE Guidelines and is expected to cause significant negative impact to daylight and sunlight access to the existing internal spaces at Unit 16.** In light of the above, it is considered that **sunlight/daylight should be a constraint to the granting of planning permission** at Unit 15." [para 6.4]*
 - 4.2 The report concludes that **daylight within all habitable rooms at Unit 16 would no longer be adequate**, with one window falling below the target criteria set within BS 8206 Pt 2 and the BRE publication "Site Layout Planning for Daylight & Sunlight – A guide to good practice," because of the development at Unit 15. [para 6.2]
 - 4.3 All floors of Unit 16, as with all of the sui generis units in that block, should be considered as though they were in residential use since the planning consent on those units affords flexibility to the owners to configure the internal space as desired. This flexibility was a highly prized feature when the unit was purchased by the current owner. As the Council is aware (if not the Committee), the current owner of Unit 16 has had plans afoot since [xxx] to reconfigure the property so that the ground floor will indeed be residential. [para 4.1]
 - 4.4 We understand from our expert surveyors that the Average Daylight Factors (ADF) assessment contained in our report is more accurate than the Vertical Sky Component (VSC) measurement relied upon by the applicant, which is too simplistic. We also understand that BS 8206 Pt 2, which is incorporated into the BRE Guide, supports the use of ADF. [para 5.4]
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- 4.5 When plotting ADF, our surveyors can demonstrate that the proposed development will result in an average loss of daylight on each floor as follows:
 - 4.5.1 Ground floor – 16% reduction
 - 4.5.2 First floor mezzanine cannot be measured
 - 4.5.3 Second floor – 17% reduction
 - 4.5.4 Third floor (living dining space) – 25% reduction, **which takes it below the BS minimum for such use**
 - 4.5.5 Third floor (bedroom) – 8% reduction

[para 5.4]

- 4.6 The applicant itself has recognised that, even on the more simplistic VSC measurement, the proposed development will result in a breach of the BRE thresholds for one window at Unit 16 and a reduction of light by 27%. [GIA report, page 6]
- 4.7 In terms of sunlight, we note that the building is north facing. It already has a fairly low amount of sunlight (except on the third floor). In all cases, **the proposed development would extinguish all natural sunlight from Unit 16 on all floors.** [para 5.4]
- 4.8 In terms of sunlight, the report concludes: "*The Annual Probable Sunlight Hours (APSH) analysis demonstrates that there is **significant change between the expected amount of sunlight to the habitable rooms at Unit 16. The results indicate a complete loss of APSH, which would well exceed the recommended BRE threshold.***" [para 6.3]

- 5. We note that the restrictive covenant on the title of Unit 15 which reads:

"No building shall be erected on the land hereby transferred to a greater height than thirty-five feet from ground level."

It is our view that the covenant remains enforceable. It is a big cautionary call from the past, reminding us that light is critical, especially now that the entire area around Blue Lion Place is so overbuilt and daylight, never mind sunlight, is at a premium.

- 6. We also note that the existing 3-storey building on the site has been purposefully designed so that it steps back from the boundary. This design feature is to ensure that the impact on light is minimised. We assume it was a planning condition imposed on the previous developers.
- 7. It seems odd to us that daylight / sunlight issues have been relevant historically to developments on this site, but that the applicant is now asserting that they should no longer be relevant.
- 8. We urge the committee to reject the planning application on these grounds.

Yours faithfully

Owners of Unit 16, Blue Lion Place