



By Email

Simon.Greenwood@islington.gov.uk

Mr S. Greenwood
Principal Planning Officer
Major Applications Team
Environment and Regeneration Department
London Borough of Islington
222 Upper Street
LONDON
N1 1YA

DATE / REF

16/05/2017

BMC/9771

ADDRESS

THE WHITEHOUSE
BELVEDERE ROAD
LONDON SE1 8GA

CONTACT

TEL 020 7202 1400

FAX 020 7202 1401

MAIL@GIA.UK.COM

WWW.GIA.UK.COM

Dear Mr Greenwood,

Re: The proposed redevelopment of Regents Wharf, London – Daylight and Sunlight Summary Letter

I write in connection with Grafton Advisors submission for the proposed redevelopment of Regents Wharf, London. Following recent meetings and correspondences with Islington Council, GIA have been asked to provide a letter to outline the changes (if any), with regards to Daylight and Sunlight, between the November 2016 submitted scheme and the recently submitted May 2017 scheme.

The differences in the scheme are illustrated in figures 01 and 02 below. The main changes occur to the podium element of the proposal which shows a reduction in the height and massing adjacent to Regent's Canal and the Ice Wharf properties. Also, a marginal increase of massing has been captured along All Saints Street. Both changes have been clearly identified and circled in red in Figure 02 below.

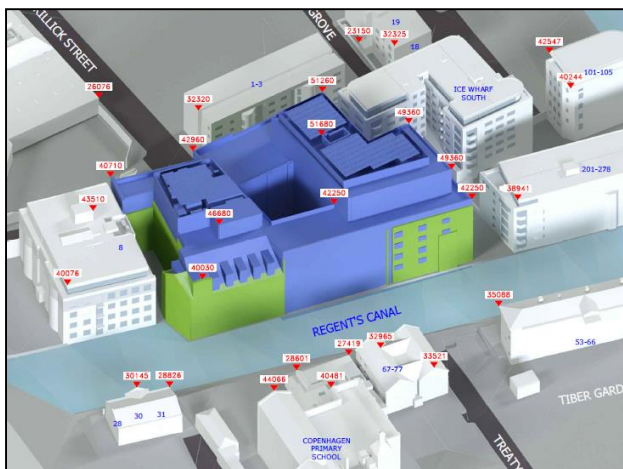


Figure 01 – November 2016 Scheme

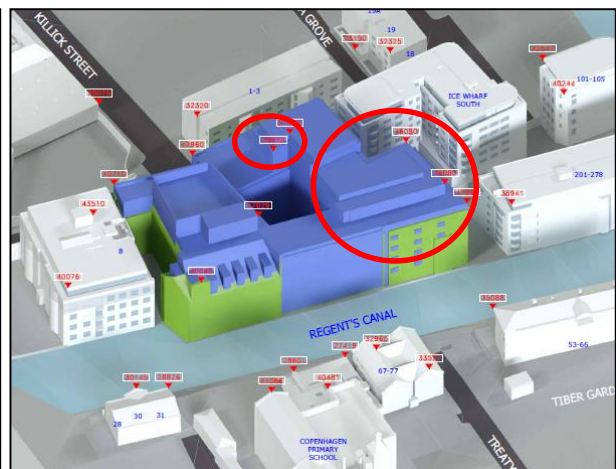


Figure 02 – May 2017 Scheme

GIA have been provided with a third party daylight and sunlight report. The third party report was predicated against all daylight and sunlight impacts. It is acknowledged that GIA have tried, where possible, to address all the key factors identified within this representation within our May 2017 report. The main points that have been clearly covered are:

- ADF and its use;
- A “without balconies” assessment; and
- Correct layouts of Ice Wharf South (NSL contours attached).

Both Daylight and Sunlight reports consider our interpretation of the existing buildings on site today, compared with the proposed schemes. In our experience, the London Borough of Islington considers residential properties more sensitively in relation to daylight and sunlight. To this regard we have prioritised our assessments to consider the impact upon the residential accommodation in the immediate site context.

GIA have considered 11 properties in the surrounding context to be relevant for assessment, these include:

- 35-66 Tiber Gardens
- 67-77 Treaty Street
- Copenhagen Primary School
- 31 Thornhill Bridge Wharf
- 30 Thornhill Bridge Wharf
- 28 Thornhill Bridge Wharf
- 1-3 All Saints Street
- 18-19 New Wharf Road
- Ice Wharf South
- 101-105 Ice Wharf
- 201-278 Ice Wharf

In both reports the following seven properties will experience full BRE compliance by reference to the primary daylight methodology (Vertical Sky Component) and Annual Probable Sunlight Hours (APSH) therefore no further examination is required.

- 35-66 Tiber Gardens
- Copenhagen Primary School
- 31 Thornhill Bridge Wharf
- 30 Thornhill Bridge Wharf
- 28 Thornhill Bridge Wharf
- 18-19 New Wharf Road
- 101-105 Ice Wharf

The four properties that will experience BRE transgressions in both reports are discussed in further detail in the table below:

Address	November 2016 Scheme	May 2017 Scheme
67-77 Treaty Street		
Daylight	27/29 windows relevant for assessment are fully compliant to VSC. 2 remaining windows experience a small reduction of 26.7% and 23.5% respectively.	All windows assessed against the VSC demonstrate full compliance to this methodology.
Sunlight	11/13 rooms showed full BRE compliance to the APSH assessment.	Only 1 room falls short of guidance and this is only in winter sun. (R5/20) will illustrate excellent levels of retained annual APSH of 32%.
201-278 Ice Wharf		
Daylight	61/66 windows assessed are fully compliant for VSC. 4/5 remaining windows only marginally fall short of the 20% target value producing alterations of between 20.5% and 25.8%. 1 remaining window experiences a reduction of 34%, however, the window will have a VSC retained values of 17.3%.	65/66 windows assessed for VSC demonstrate full BRE Guidance. The 1 remaining window W9/124 only marginally falls short by 24.4% but has a retained VSC value of 19.8% which would be considered good in daylight terms.
Sunlight	When we compare the November 2016 and May 2017 reports the result remain consistent. The main difference is that the retained annual and winter APSH increases in the rooms that experience marginal transgressions by 1-2% in some instances.	
1-3 All Saints Street		
Daylight	19/35 windows fully compliant to the VSC. 6/16 remaining windows have a retained VSC of 15+%.	GIA have undertaken further due diligence into 1-3 All Saints Street and a further three of the 35 windows originally assessed are said to serve stairwells. 12/32 windows illustrate full compliance to the VSC.

	<p>4/10 remaining windows experience reductions in VSC of between 23%-25.1%.</p> <p>The 6 remaining windows are considered to serve 6 rooms. 1/6 are complaint to NSL.</p> <p>Against the ADF the 5 remaining rooms are already below the BRE target in the existing scenario and only experience a marginal reduction, with an average 0.1% absolute change.</p>	<p>5/20 remaining windows have a retained VSC of 15+%.</p> <p>7/15 remaining windows experience reductions in VSC of between 21.4%-28.4%.</p> <p>8 remaining windows are considered to serve 8 rooms. Against the NSL 3/8 rooms illustrates compliance to the BRE Guidelines.</p> <p>When we then look at the ADF 1/8 is fully compliant.</p> <p>The remaining four rooms are already below the BRE target of ADF in the existing scenario and only experience a marginal reduction of 0.2% absolute change.</p>
Sunlight	100% compliance within the BRE Guidelines and therefore the impacts are considered acceptable.	
Ice Wharf South		
Daylight	<p>With Balconies</p> <p>45/90 windows show full compliance to the VSC. 20/45 remaining windows have a retained VSC equal to or in excess of 15%.</p> <p>25 remaining windows are considered to serve 20 rooms. 11 / 20 rooms show full compliance to NSL</p> <p>Against the ADF 2/9 rooms experience a retained ADF of 1%.</p> <p><u>3 / 7 serve bedrooms</u></p> <p>3 rooms ADF of 0.8%, 0.9% and 0.9% respectively against a 1% ADF target value for a room in the BRE Guidelines.</p> <p><u>4 / 7 serve LKD's</u></p> <p>The four remaining rooms serve LKD's. Given the existing architectural form of the elevation of Ice Wharf (with balconies) coupled with the close proximity to the development it is likely that any development on site may cause a change in light condition to Ice Wharf South.</p>	<p>With Balconies</p> <p>49/91 windows show full compliance to the VSC. 20/ 42 remaining windows have a retained VSC equal to or in excess of 15%.</p> <p>22 remaining windows are considered to serve 17 rooms. 7/17 rooms show full compliance to the NSL.</p> <p>ADF assessment 5/10 remaining rooms show full compliance to the ADF.</p> <p>5 remaining rooms serve five LKD's these include.</p> <p>1/5 LKD (R2/103) would retain at least 1.3% ADF which is considered to be a reasonable daylighting value given the urban context.</p> <p>The four remaining LKD's are all served by windows that are located below balconies.</p>
	<p>Without Balconies</p> <p>Not completed</p>	<p>Without Balconies</p> <p>2/4 rooms show full compliance to the ADF.</p> <p>Two final rooms (R9/101 and R9/102) experience a change of ADF that will be less than 0.3% which would be considered a small change in absolute terms.</p> <p>It should be acknowledged that the levels of retained daylight to Ice Wharf South post implementation of the Regents Wharf scheme is commensurate with the existing daylight levels experienced within 1-3 All Saints and other surrounding properties.</p>
Sunlight	100% compliance within the BRE Guidelines and therefore the impacts are considered acceptable.	


Summary and Conclusion

Following the amended proposal dated May 2017, our findings are as follows;

- Our detailed technical analysis for the May 2017 scheme considers that there is only a very slight increase in the loss of light to 1-3 All Saints Street, from 0.1 to 0.2% ADF in some instances. It should be acknowledged that the levels of retained daylight to All Saints Street post implementation of the Regents Wharf scheme is commensurate within this urban locality.
- There has been an improvement in the overall daylight results for Ice Wharf South, 66-77 Treaty Street and 201-278 Ice Wharf. Furthermore when we consider Ice Wharf South without balconies it is clear that it is the architectural form of Ice Wharf South rather than the proposal itself that is contributing to the light loss within this property.

I trust the above is satisfactory and assists in clearly outlining the differences in the two schemes.

Yours sincerely
For and on behalf of GIA

A handwritten signature in black ink, appearing to read 'Bronagh McC.', with a stylized flourish at the end.

Brónagh McGivern
Associate Partner
bronagh.mcgivern@gia.uk.com