

Paul Robinson

From: Jonathon Weston <[REDACTED]@ballymoregroup.com>
Sent: 01 April 2016 14:04
To: Matt Christie
Cc: COUGHLAN, Tony; Julian Shirley ([REDACTED]@dp9.co.uk)
Subject: RE: The Goodsyard
Attachments: The Goodsyard - Daylight Report

Matt

For clarity, attached is the email sent to the GLA's advisors on 24th March at 7.42am containing all the information requested

Regards

From: Matt Christie [[mailto:\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)]
Sent: 01 April 2016 13:13
To: Jonathon Weston <[REDACTED]@ballymoregroup.com>
Cc: COUGHLAN, Tony <[REDACTED]@hammerson.com>; Julian Shirley ([REDACTED]@dp9.co.uk)
<[REDACTED]@dp9.co.uk>
Subject: RE: The Goodsyard

Jon,

Thanks for your email. As you can expect I am currently very busy with the report, so close to the deadline, and will likely have no time today for a meeting. I anticipate that next week will be very difficult as well. Perhaps you could outline what it is you wish to discuss, then at least I can consider whether a meeting is necessary as my availability is very limited.

Just to recap, at our last meeting 21 March on sunlight/daylight issues it was agreed that the JV would send additional data to GLA's consultant for independent assessment. No additional data that would allow independent assessment has been received. As you are also aware, we have been engaging to address the outstanding heritage issues and, most recently, on 22 and 23 March I emailed DP9 for a response to the listing issue. I have still received no response.

Whilst we feel we have made every effort to engage and resolve any outstanding issues, as a planning authority with limited resources we have to use judgement about how best to engage and when to focus on assessing the scheme in order to make the deadlines informed by the hearing date. As you know once we publish the report everyone will have an opportunity to make representations. A supplemental report will then pick up any further points made before the hearing.

Many thanks

Matt Christie | Senior Strategic Planner and Urban Designer | Development & Projects

Greater London Authority | City Hall, The Queen's Walk, More London Riverside, London SE1 2AA

Tel: 020 7983 [REDACTED] Email: [REDACTED]@[london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: Jonathon Weston [[mailto:\[REDACTED\]@ballymoregroup.com](mailto:[REDACTED]@ballymoregroup.com)]
Sent: 01 April 2016 10:14
To: Matt Christie
Cc: COUGHLAN, Tony; Julian Shirley ([REDACTED]@dp9.co.uk)
Subject: The Goodsyard

Matt

It's been a couple of weeks since our last meeting. I was wondering if you were around today for a brief catch up?

I'm happy to come over to City Hall

Regards

Jon

Jonathon Weston
Projects Director

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GREATERLONDONAUTHORITY

Paul Robinson

From: Alex Buckley <[REDACTED]@gia.uk.com>
Sent: 24 March 2016 07:42
To: Absolon, Ian (GVA)
Cc: Gordon Ingram; Stephen Friel; Joanna Lyons
Subject: The Goodsynd - Daylight Report
Attachments: 2016-03-23_BGY flow chart report_update_L.pdf

Dear Ian,

I trust you're well.

As promised, please find attached the updated flow-chart report which provides further information on all 26 of the properties previously identified.

In relation to the figures contained within your report, counting the rooms identified as falling below their criteria on page 8 gives a figure of 396 and we're currently struggling to understand how the figure of 412 stated on the following page has been attained. From our analysis of the data, however, we believe this figure ought in fact to be 335 rooms as there are 335 rooms across the site which:

1. See VSC reductions greater than 20%
2. Do not retain at least 15% VSC
3. And either:
 - a. Do not pass the ADF minimum criteria (minimum achieved in the proposed or else a 20% reduction), or
 - b. See levels of below 70% NSL in the proposed condition

This could well be down to commercial or non-habitable spaces but please do let us know if you disagree though.

In relation to the attached we would like to draw your attention in particular to page 49 which contains the impact of two alternative massing options (Minimum Parameter and the Maximum Parameter with the Block D taller tower removed) on Telford Homes.

Whilst we would like to present the figures for the entire site, unfortunately this analysis is still running. That said, from the Telford Homes analysis alone we are able to extrapolate some overall figures.

From our assessments of the maximum parameters we find 185 rooms which:

4. See VSC reductions greater than 20%
5. Do not retain at least 15% VSC
6. See retained levels of ADF below that recommended (or a greater than 20% loss if this is not met in the existing)
7. See retained levels of NSL below 70% (or a greater than 20% loss if this is not met in the existing)

These are therefore the worst affected rooms and 99 of these are located in Telford Homes which leaves 86 elsewhere surrounding the site.

Page 49 of the attached therefore shows that, should the minimum parameter be built rather than the maximum, the figure of 99 rooms in Telford reduces to 21. In a worst-case scenario therefore, where the reduction in massing does not improve any of the remaining 86 rooms, we are looking at a total of 107 rooms.

This compares to removing the tall tower which would give a worst-case figure of 115 (29 in Telford Homes and 86 elsewhere). It can be seen from this therefore that building to the minimum parameter in fact improves the levels of light further than not building the taller tower of Block D.

Whilst we accept that there are still some differences between us in relation to the final figures we would hope you agree this to be a significant improvement. As per discussions with the GLA on Monday, therefore, we would hope you see this as a way for the scheme to be endorsed as is.

Kind Regards,
Alex

Alex Buckley
Partner
DD 020 [REDACTED]



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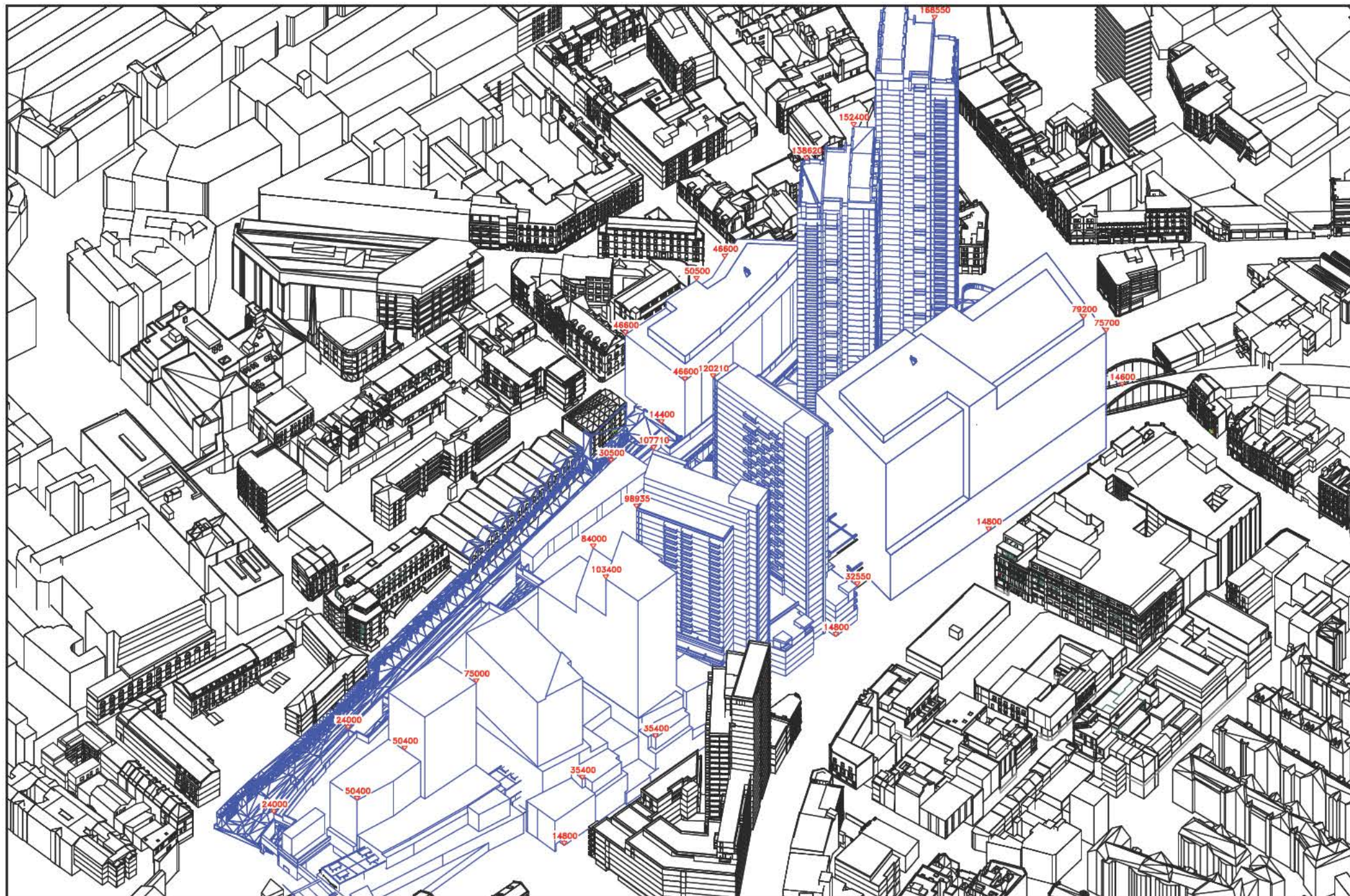


This document is supplementary to the EIA Chapter on daylight, sunlight and overshadowing dated June 2015 as submitted with planning application PA/15/02011 and 2014/2425 for the Bishopsgate Goodsyard site. It does not provide any new information but rather represents the numerical results and observations in the original document in a different format and structure. The intention

is to clarify as far as possible the true impact of the planning application scheme in relation to the amenity currently enjoyed around the development site. Consequently, we have set out the context of our analysis and also summarised the impacts to the key 26 properties that the Local Authorities and GLA have considered to be appreciably affected by the proposed scheme.

Context

The context of any scheme needs to be considered when establishing the impact that it may cause to its neighbours. We consider there are seven main contextual points which are relevant to this scheme:



A) Interim Planning Guidance (IPG)

B) BRE Guidelines

C) Residual daylight values

D) Other planning applications

E) Potential amendments to the scheme

F) Number of properties analysed and impacted

G) GIA Research Study

It is appreciated that the IPG concepts illustrated in the diagram (right) were not tested for daylight and sunlight and that the document itself acknowledged the need for that to be done.

However, the key point here is that nothing like the massing and area envisaged could be possible without creating impacts similar to those of the planning application.

The site constraints that exist naturally determine the location of buildings and the presence of a large south facing park means that the size and use of the buildings have to be properly viable.

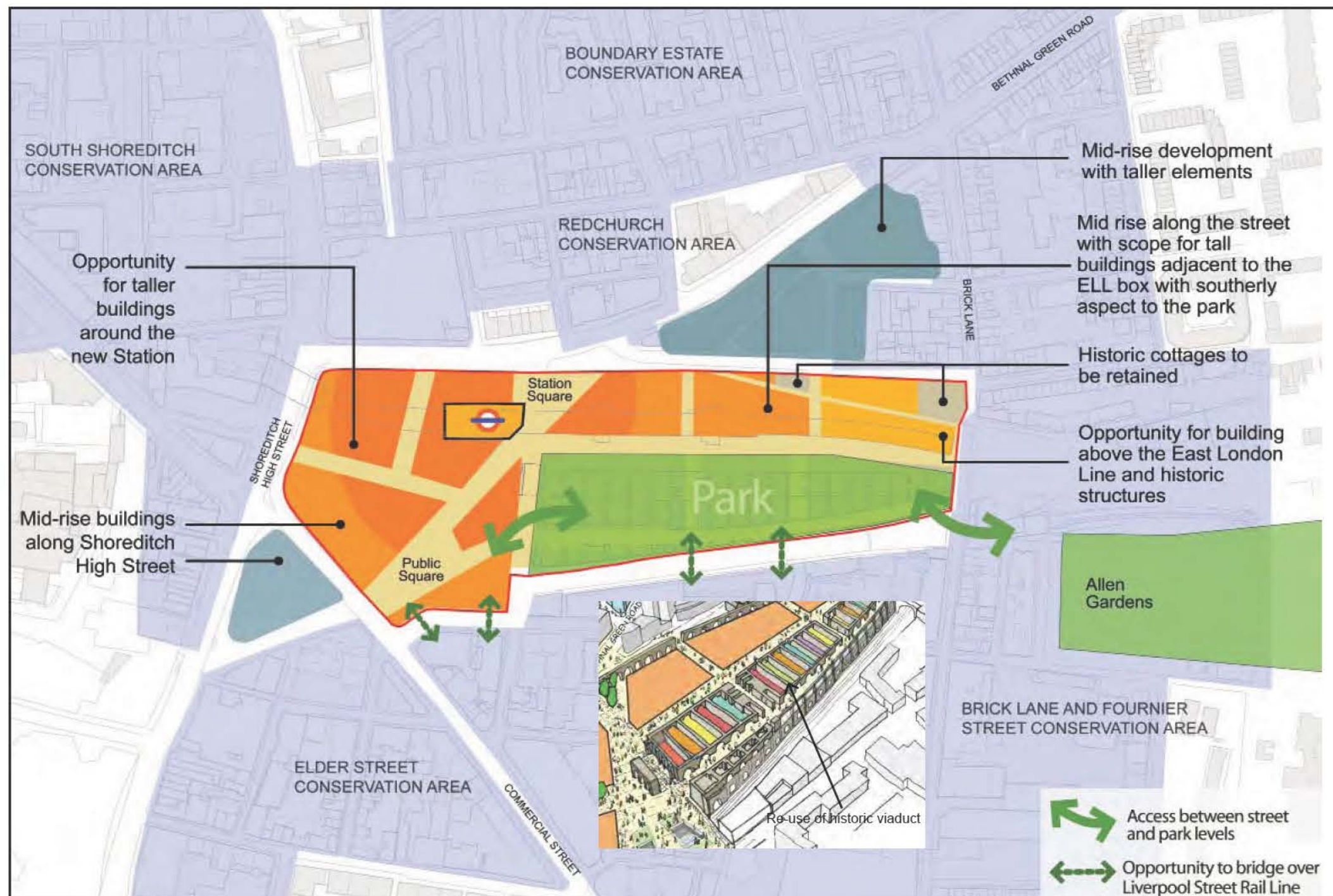
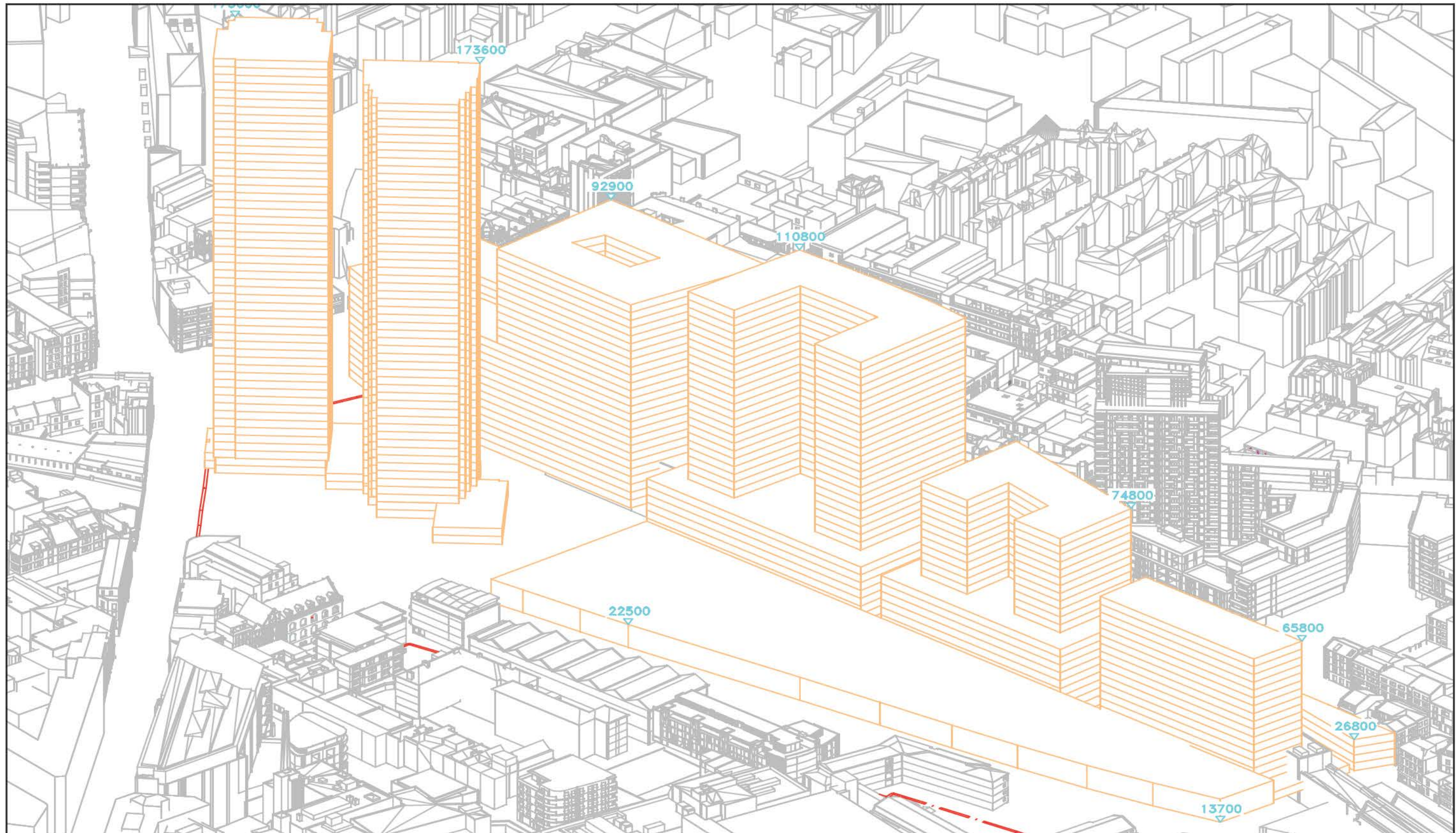


Figure 20 of IPG 2010 - Indicative Vision for Bishopsgate Goodsyards



BRE Guidelines

It is already acknowledged by the two local authorities and the GLA that these guidelines need to be interpreted sensibly and flexibly.

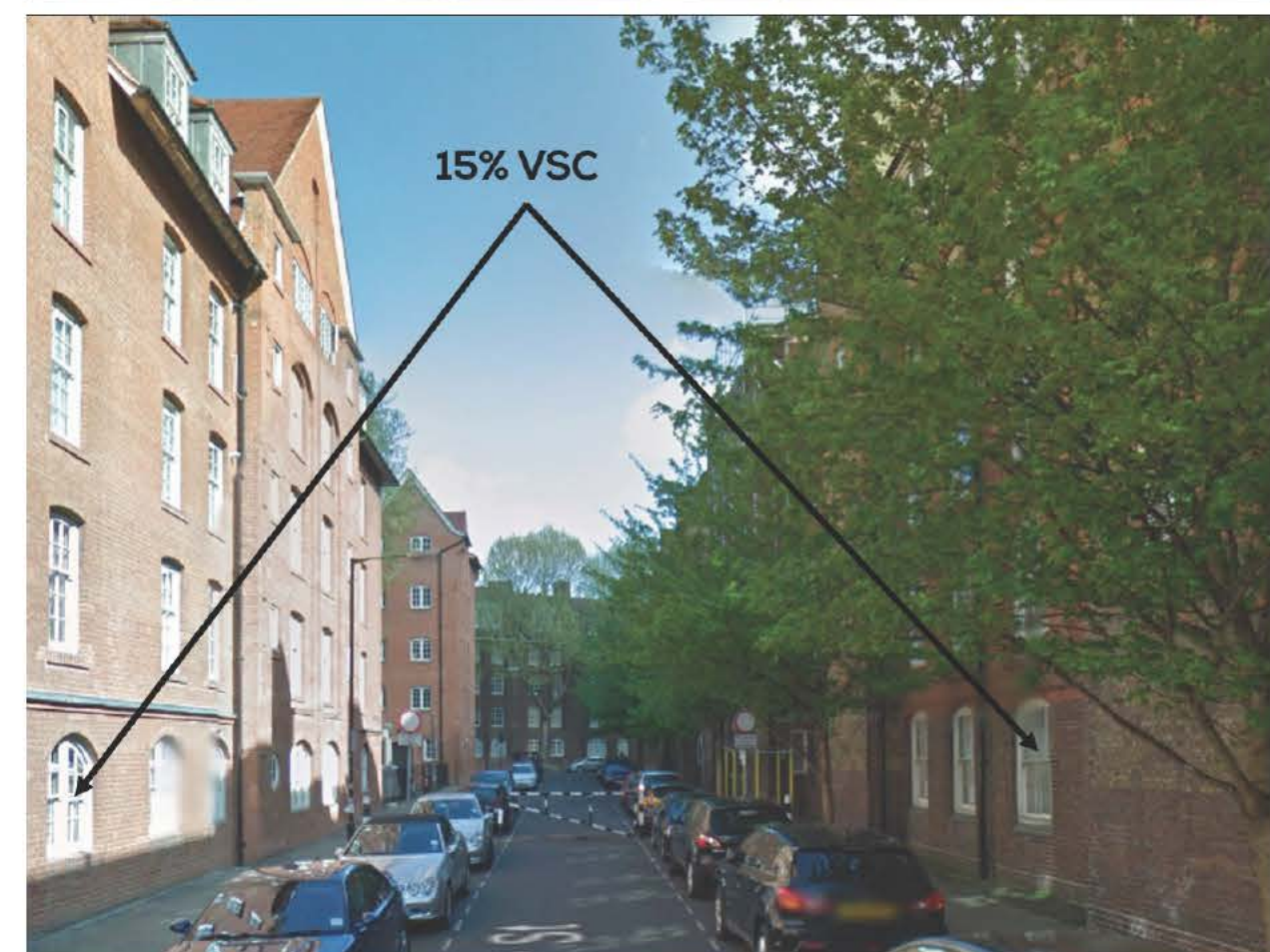
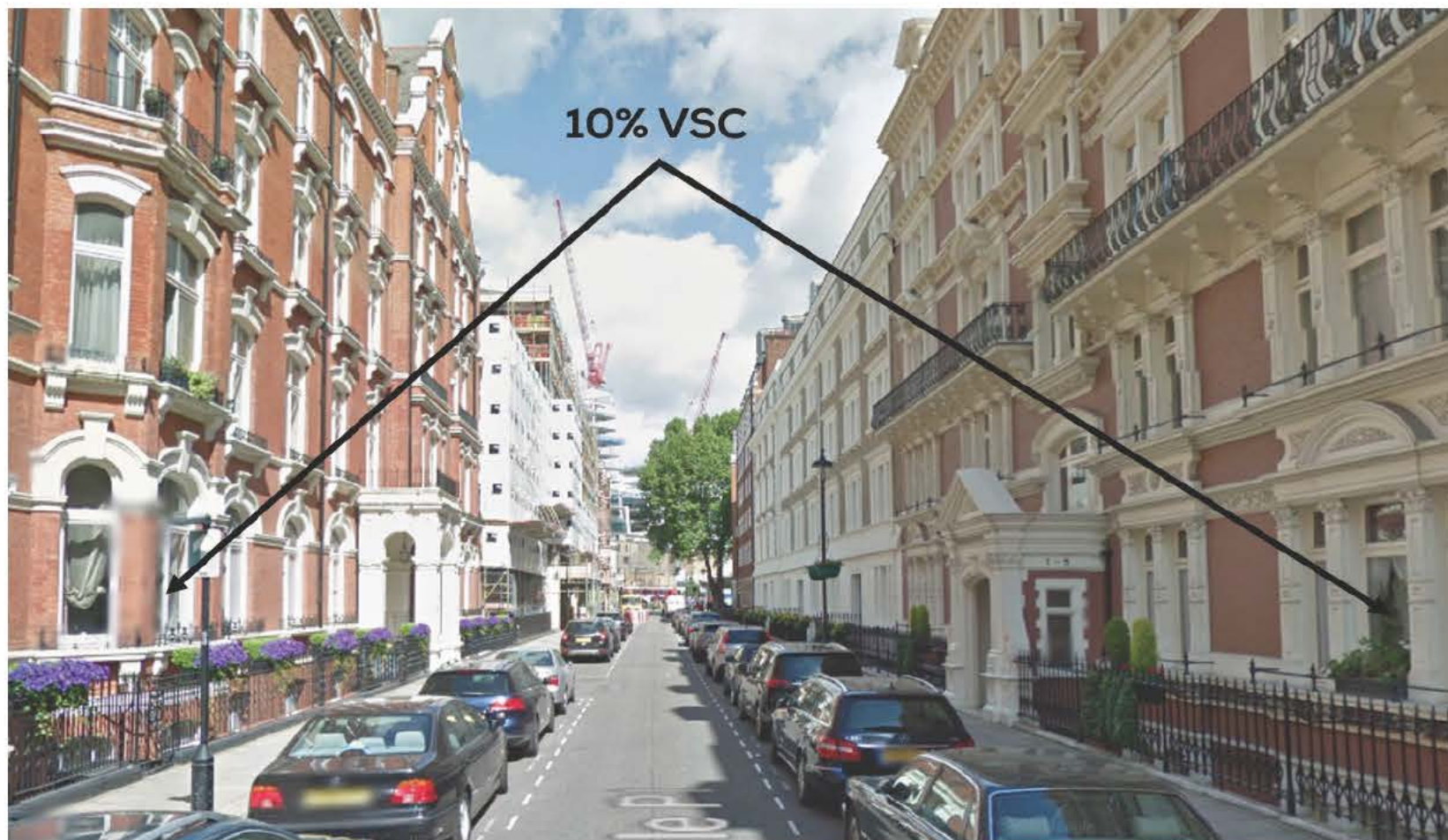
The guidelines themselves state this and additionally go on to advise that different target criteria can be appropriate in locations such as city centres.

Clearly when envisaging a major development where there are no buildings, there will always be a major contrast in numerical values, particularly when the new scheme starts above a railway track.

Retained Values

We consider it important to consider the residual values of light within the location generally but also recognising the need to develop this location. However, we wish to remain flexible on that point and not prescriptively adhere to one given residual figure eg a retained value of 15% VSC.

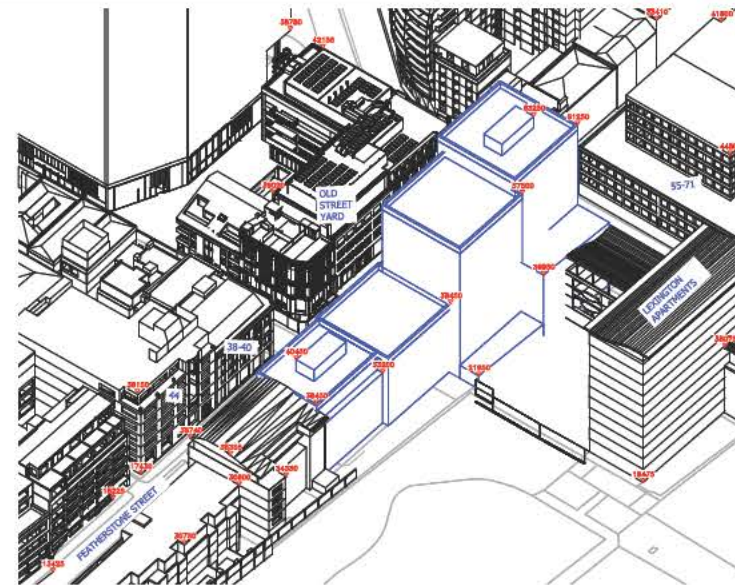
It is clear from recent GLA decisions that "mid teens" values are acceptable. However there will be circumstances where that cannot feasibly occur and we have highlighted where this is the case. Below are photographic examples of what VSC's of 5%, 10%, and 15% look like to assist in understanding this subject. The latter is actually within the Boundary Estate.



We have referred to these where necessary to highlight that, for example, LBH and LBTH have consented schemes with residual values of under 10% in some cases or between 10-15% in others.

This is very relevant particularly for Telford Homes and we have attached the original daylight and sunlight Report for the adjacent Fusion scheme (LBTH) (Galliard Homes Scheme) which is very informative on this point. In addition there is reference to the Stage scheme (LBH) and Monmouth and Featherstone (London Borough of Islington).

Monmouth and Featherstone (GLA)



Planning Application no. P2015/3136/FUL
Representation Hearing Report:

Para 120 For general guidance, whilst the BRE guidelines recommend a target value of 27% VSC when measured on an absolute scale, that value is derived from a low density suburban housing model. In an inner city urban environment, VSC values in excess of 20% should be considered as reasonably good, and VSC in the mid-teens should be acceptable.



The Stage (London Borough of Hackney)

Planning application no. 2012/3871-73 committee report:

Para 6.4.27 Recognition that this is an inner urban environment and as with the proposal the BRE guidance requires flexible implementation rather than be slavishly adhered to.



The purpose of raising this point is to acknowledge that there are no quick or easy fixes to the scheme which appreciably reduce the daylight impact to the neighbouring residential properties.

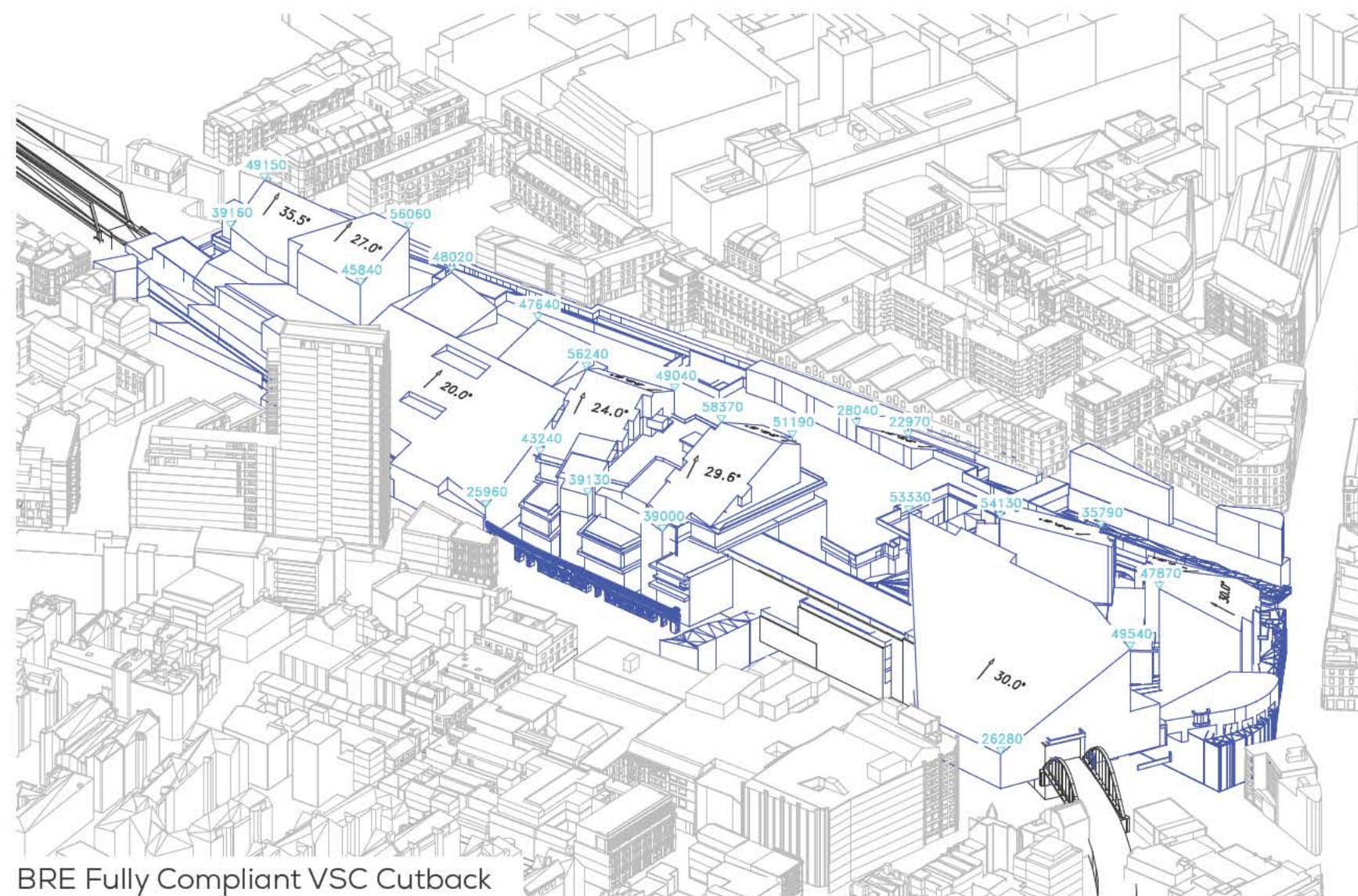
It was suggested by the Local Authorities that some small changes would create real improvements.

It is noteworthy that in relation to Hollywood Lofts and Telford Homes that we have illustrated cutbacks that would give a residual VSC value of 15%.

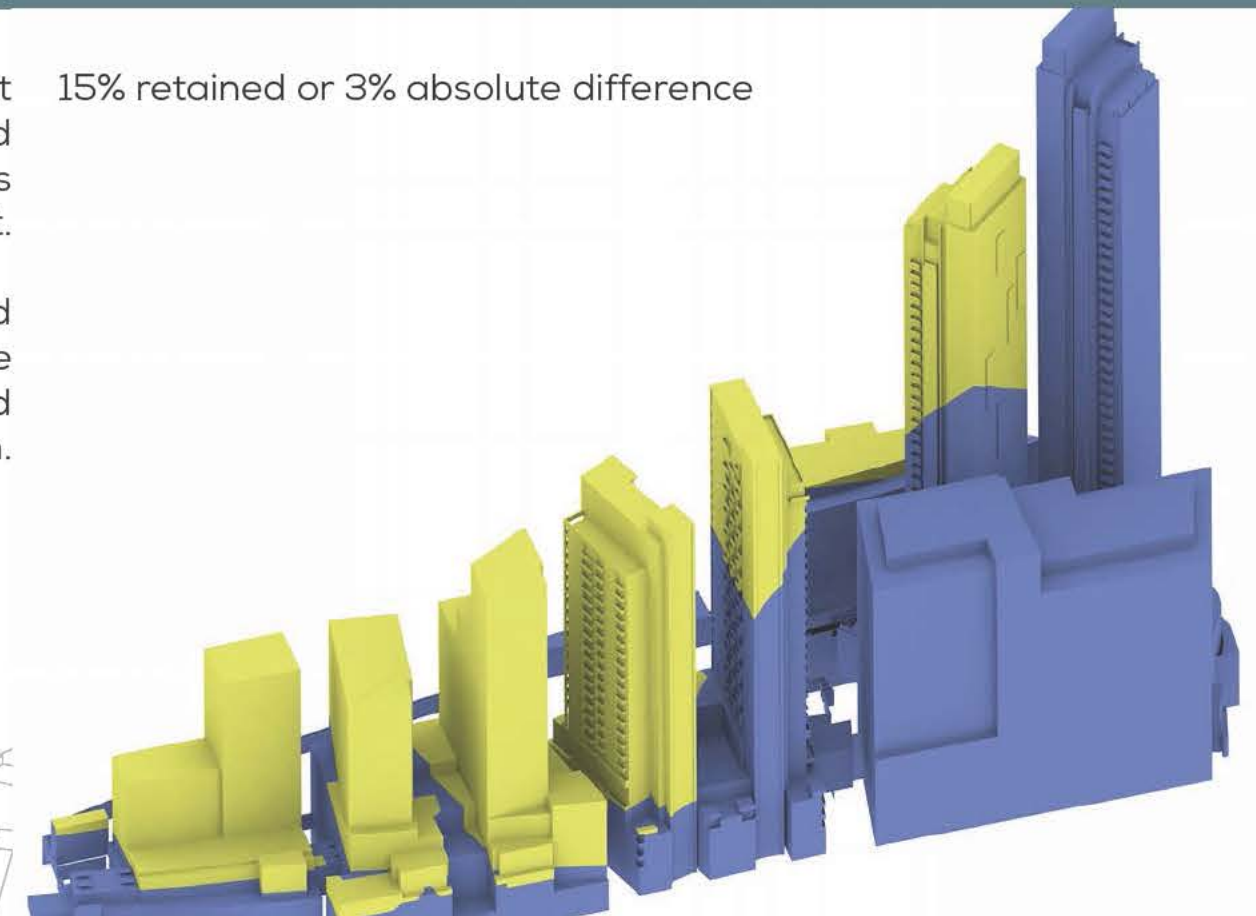
Together these two cutbacks represent the loss of circa 790 units in the Proposed Scheme (1,057,922 square feet GEA). This can be seen in the two images to the right.

In addition to this, we have also provided a fully compliant VSC cutback to illustrate the remaining massing which would need to be removed to achieve this position.

15% retained or 3% absolute difference

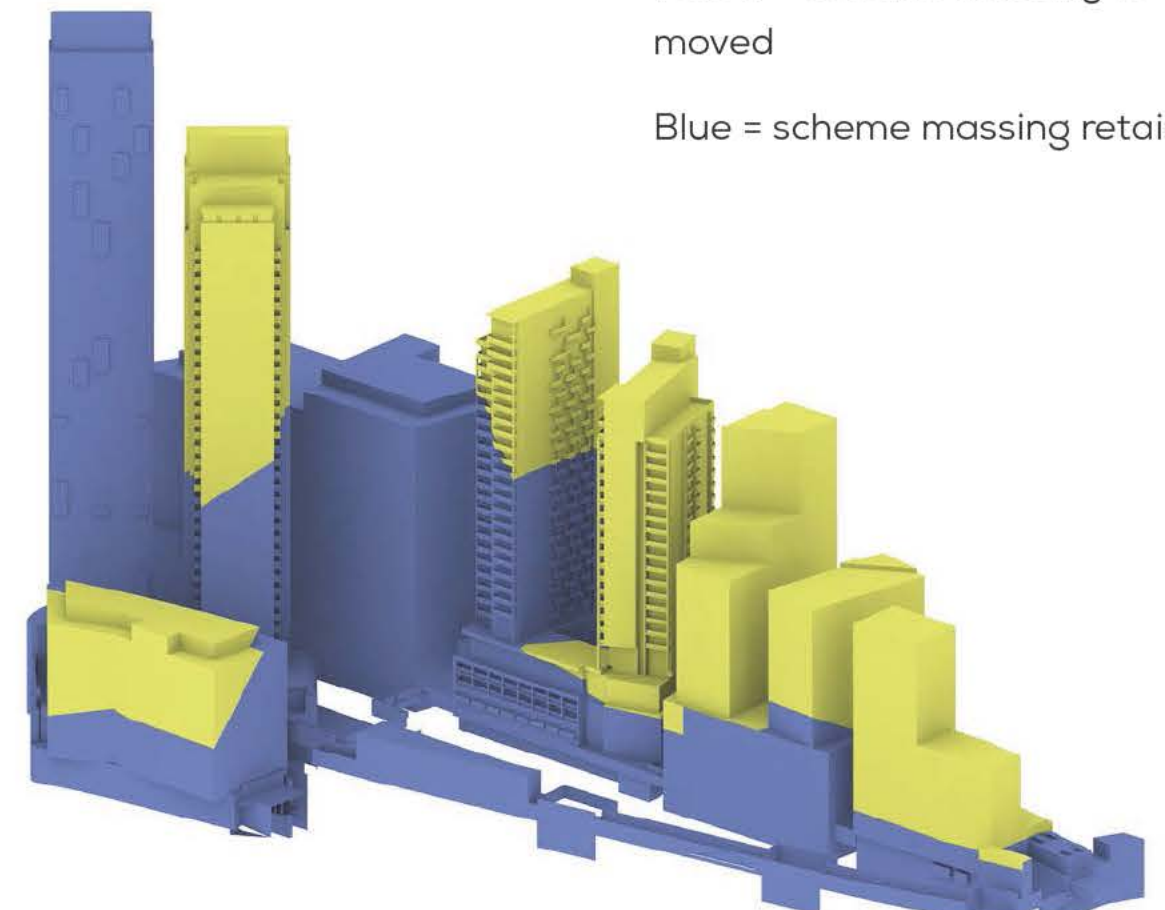


BRE Fully Compliant VSC Cutback



Yellow = scheme massing re-moved

Blue = scheme massing retained



Number of Properties Assessed and Impacted

This is relevant as it may not be understood that nearly 170 properties have been analysed in this situation to establish the degree of impact. It might be argued that we selected properties which were not affected at all to justify those which are. This is not the case

and it can be seen from the original list provided by the Local Authorities surveyor, that some of the buildings they were concerned about are over 100m away from the site. We have shown that in fact these will not be materially affected but this fact alone highlights

that to only have 26 properties on their shortlist is remarkable. In addition, of these 26, 6 are commercial and the majority have inherent design limitations in themselves eg balconies which limit the available light. Without those limitations, the available amenity would be deemed

acceptable and the BRE Guidelines invite tests to establish if that is the case.



- 1.) 196 Shoreditch High St
- 2.) 194-195 Shoreditch High St
- 3.) 65-66 Bethnal Green Rd
- 4.) 13 Bethnal Green Rd
- 5.) 30-32 Redchurch St
- 6.) 17 Bethnal Green Rd
- 7.) 3 Club Row
- 8.) 70 Redchurch St
- 9.) Telford Homes Block A
- 10.) 119 Brick Lane
- 11.) 97-105 Brick Lane
- 12.) 78 Quaker Street
- 13.) 1-48 Wheler House
- 14.) 25 Wheler Street
- 15.) 10 Quaker Street
- 16.) 167 Commercial St
- 17.) 19-29 Redchurch Street
- 18.) 14 Chance Street
- 19.) 63 Redchurch Street
- 20.) 15 Bethnal green Road
- 21.) 25 Bethnal Green Road
- 22.) 28-30 Bethnal Green Rd (1 Sclater Street)
- 23.) 1-16 Sheba Place
- 24.) 1-42 Eagle House
- 25.) 23-24 Wheler Street
- 26.) 154 Commercial Street

Whilst this is outside of the EIA and the conclusions drawn, GIA have been undertaking for the last year or so a study on the quality of residual light values within Central London.

The study is still in evolution but one fact it strongly suggests that many highly desirable mansion blocks in areas have residual values of VSC which are akin to those experienced by the neighbouring residential buildings and in certain cases they are worse.

Part of this study considers perception and emotion about buildings and their impact. For example, it has been suggested that the tall buildings will create excessive shadow over their neighbours and render the location to the north of them dark.

Our studies, which are agreed as accurate, illustrate that the shadows will not only move quickly but have limited impact and only in the winter time. The immediate perception and emotion though may suggest the opposite and therefore the true technical studies can be distorted when seen through that veil.



Stafford Place (Westminster)

Floor Average VSC	
3 rd	24.32
2 nd	20.34
1 st	17.63
Ground	11.93



Carlisle Place (Westminster)

Floor Average VSC	
3 rd	16.69
2 nd	14.98
1 st	9.52
Ground	9.57
Basement	7.45





13 Bethnal Green Road



15 Bethnal Green Road



78 Quaker Street



65-66 Bethnal Green Road

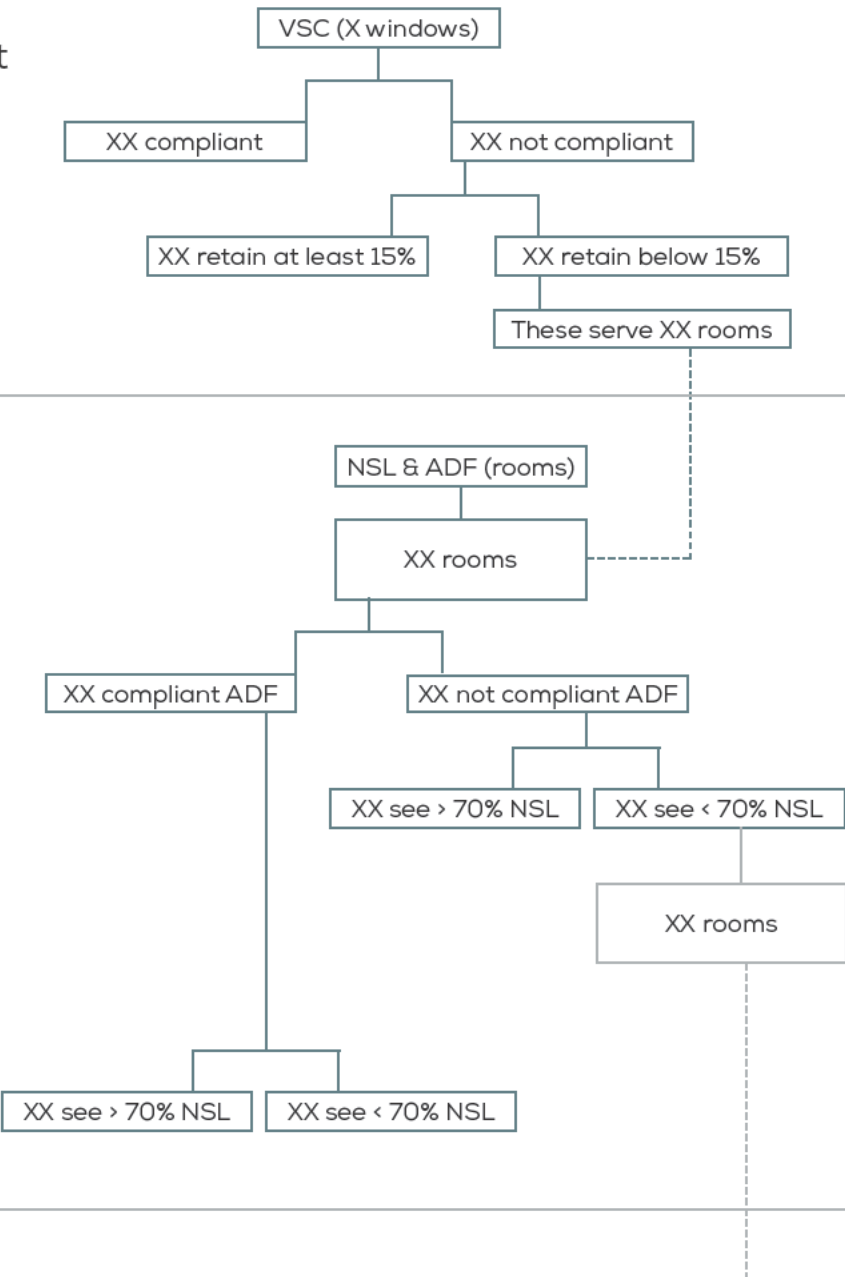


167 Commercial Street



25 Bethnal Green Road

- 1. Building by building list the number of habitable rooms tested and how many of these see a more than 20% reduction in VSC
- 2. Building by building then list the total number of rooms that will remain above 15% VSC
- 3. Building by building where rooms are left below 15% how many would pass the ADF test and be left with a daylight distribution contour of over 70% of room area.
- 4. If there are ADF levels already below standard then how many rooms fall into that category and how many see a more than 20% reduction in ADF



• **Daylight commentary per property.**

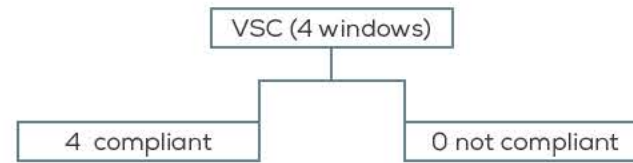
Map

Green = Properties previously discussed

Blue = Property being discussed

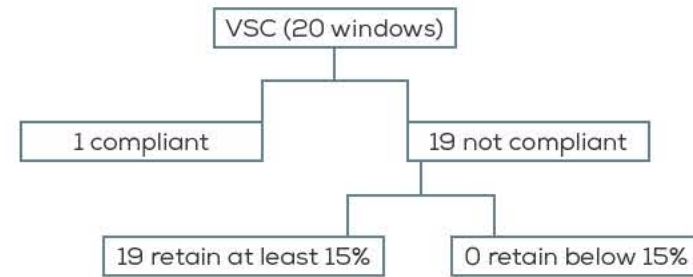
Photo

Property	Room	Window	Room Use	VSC					NSL					ADF				
				Existing	Proposed	Loss	% Loss	P/F	Existing	Proposed	Loss	% Loss	% Loss	Existing	Proposed	Loss	% Loss	P/F
Property Address	R1/XXX	W1/XXX																
	R1/XXX	W1/XXX																
	R1/XXX	W1/XXX																
	R1/XXX	W1/XXX																
	R1/XXX	W1/XXX																
	R1/XXX	W1/XXX																
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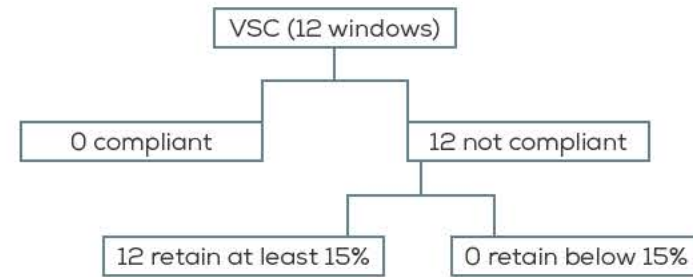
- **All BRE compliant.**





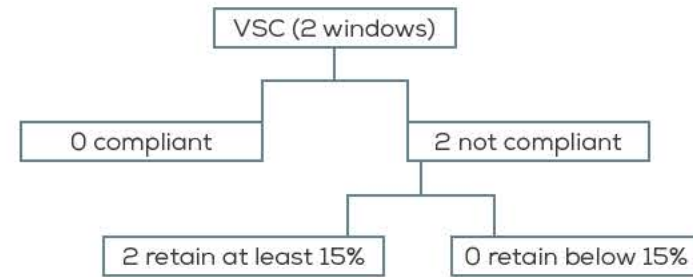
- ***All windows retain 15% VSC.***





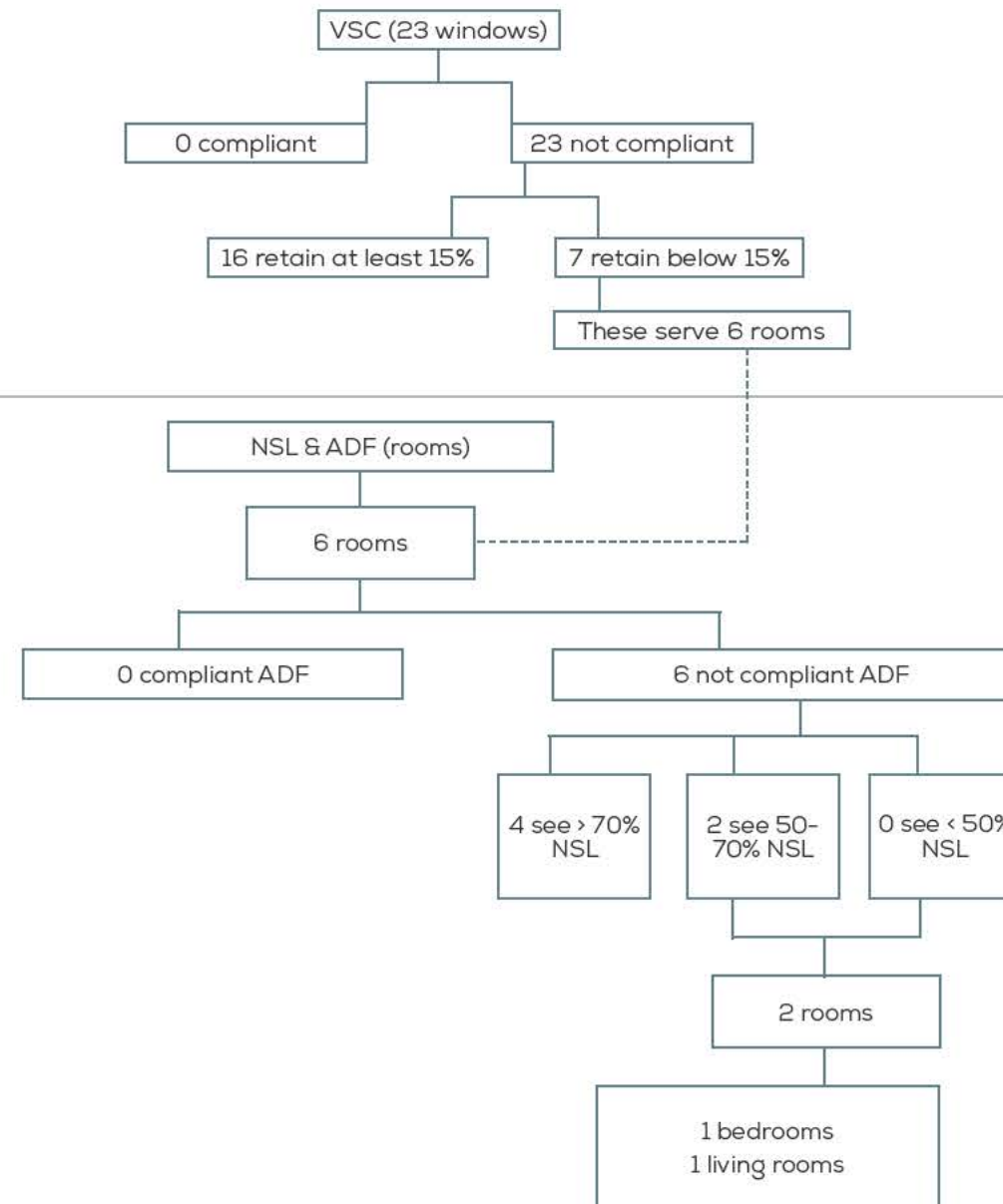
- ***All windows retain 15% VSC.***





- **All windows retain 15% VSC.**

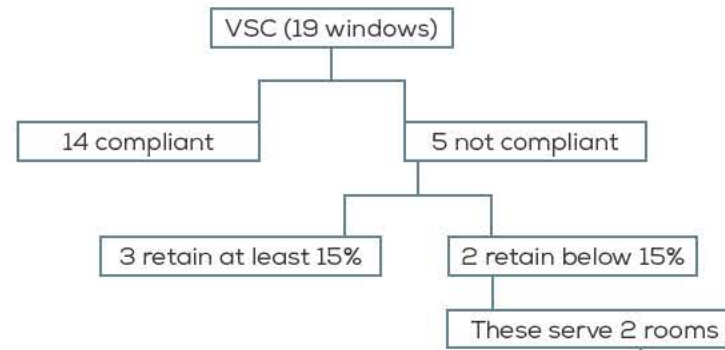
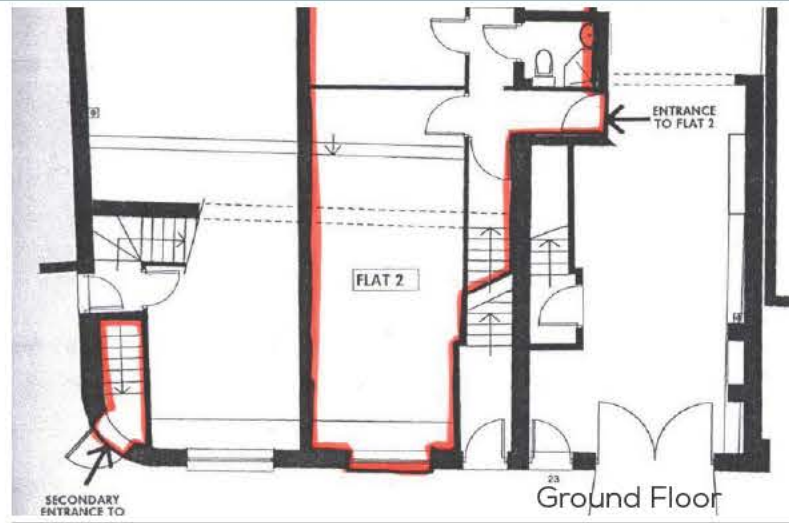




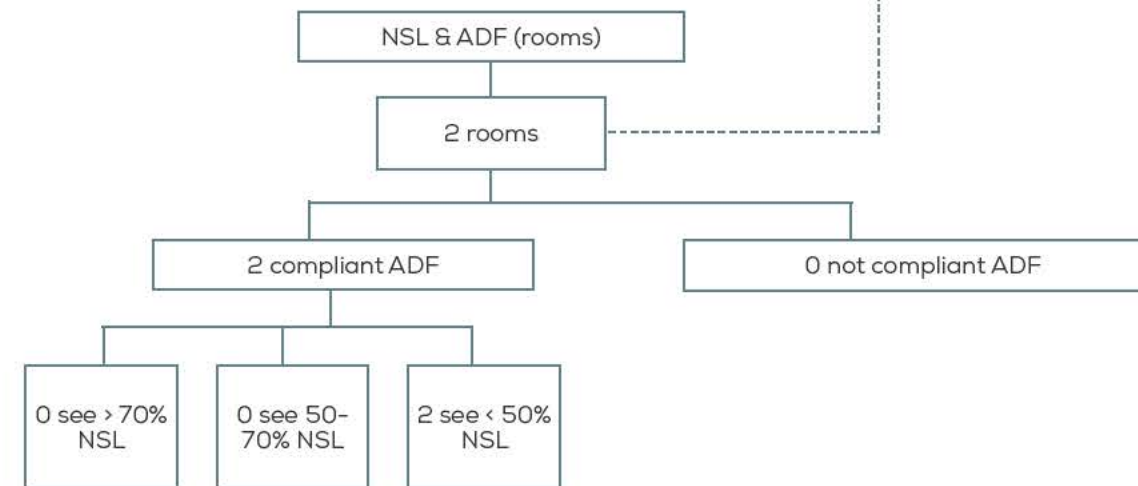
- Retain NSL >50% of room.
- 1 unit affected.



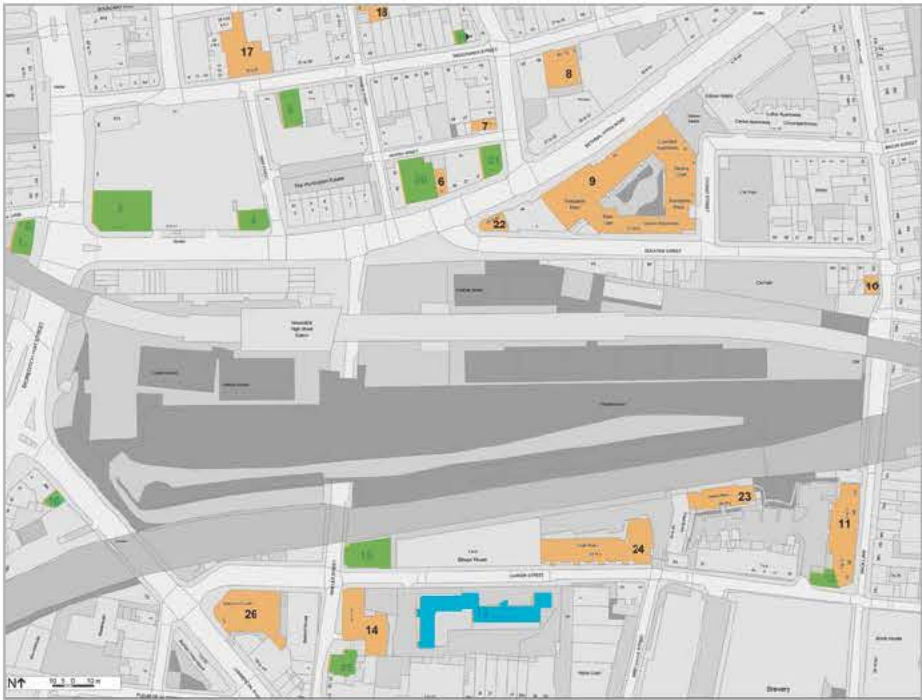
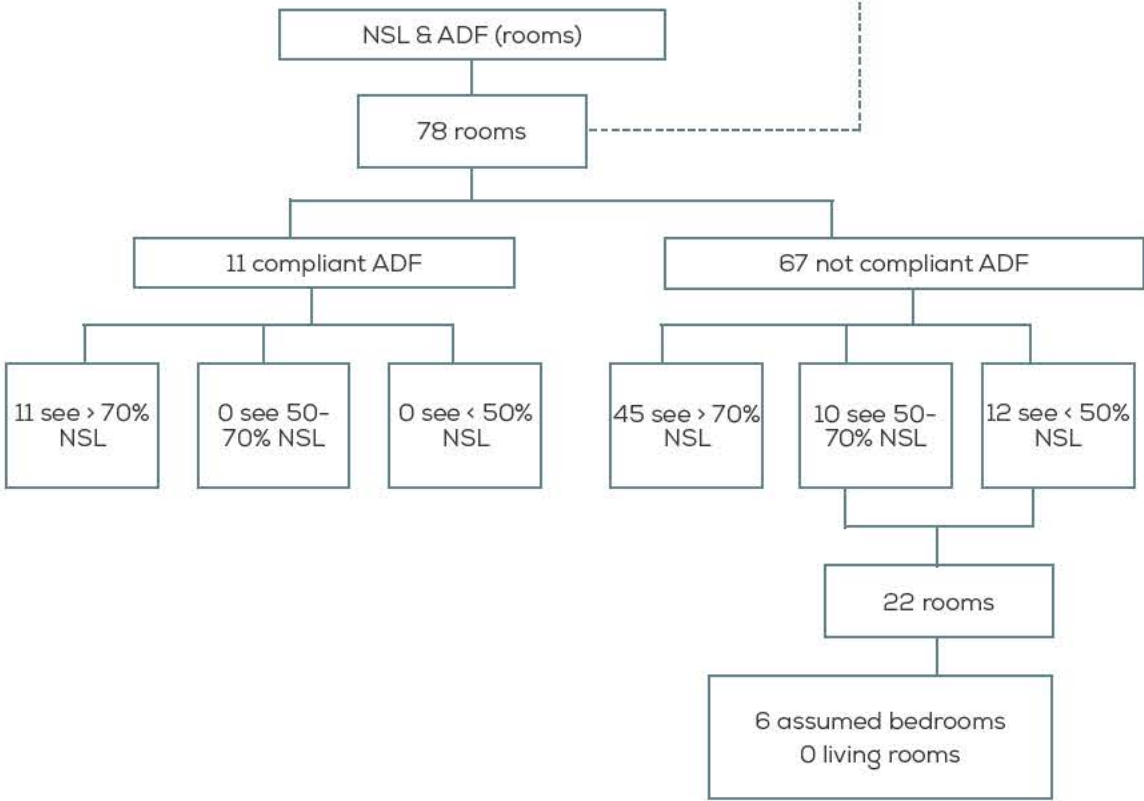
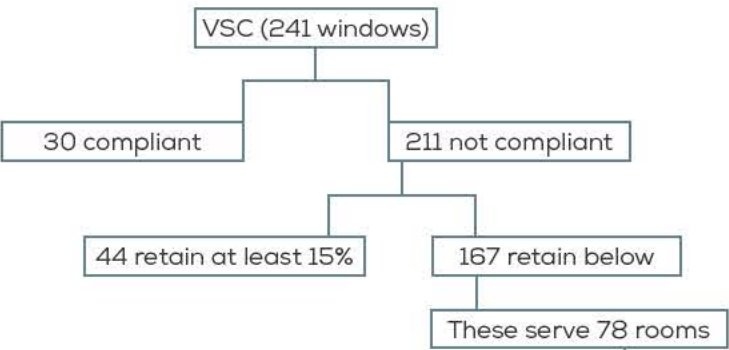
Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
10 QUAKER STREET	R4/161	W6/161	BEDROOM	36.23	13.75	22.48	62.05	90.01	50.26	39.75	44.16	0.86	0.42	0.43	50.47
	R6/161	W8/161	LKD	33.59	10.15	23.44	69.78								
		W9/161		21.32	15.56	5.76	27.02	90.31	67.92	22.39	24.79	1.39	0.97	0.42	30.12



- Almost all windows VSC compliant or retain 15% VSC.
- Remaining two rooms meet ADF criteria.



Without balconies
the majority of
windows retain
approximately 15%
VSC.



Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
1 to 48 Wheler House (west part)	R1/170	W48/170	BEDROOM	2.86	0.89	1.97	68.88	72.95	34.23	38.72	53.07	0.38	0.05	0.33	87.11
	R2/170	W47/170	BEDROOM	2.93	1.30	1.63	55.63	70.77	60.24	10.53	14.74	0.28	0.15	0.14	48.06
	R4/170	W46/170	KITCHEN	2.96	1.37	1.59	53.72	55.01	43.45	11.56	21.01	0.15	0.05	0.10	65.79
	R6/170	W41/170	BEDROOM	3.10	1.53	1.57	50.65	63.50	49.95	13.55	21.48	0.26	0.11	0.16	59.77
	R7/170	W40/170	KITCHEN	3.31	1.57	1.74	52.57	54.05	47.44	6.61	11.93	0.19	0.10	0.09	49.20
	R2/6400	W2/6400	BEDROOM	1.92	0.61	1.31	68.23	54.59	50.15	4.44	8.14	0.28	0.13	0.16	54.58
	R6/6400	W7/6400	KITCHEN	2.26	0.95	1.31	57.96	24.82	21.79	3.04	12.23	0.22	0.10	0.12	53.24
	R7/6400	W8/6400	KITCHEN	2.29	1.17	1.12	48.91	26.82	24.88	1.94	7.23	0.21	0.12	0.08	40.58
	R2/6401	W2/6401	BEDROOM	3.37	2.16	1.21	35.91	68.41	66.63	1.78	2.60	0.31	0.20	0.12	37.26
	R6/6401	W7/6401	KITCHEN	4.22	2.61	1.61	38.15	42.32	42.32	0.00	0.00	0.29	0.18	0.10	36.36
	R7/6401	W8/6401	KITCHEN	4.28	2.83	1.45	33.88	44.10	43.46	0.65	1.47	0.28	0.20	0.08	26.98

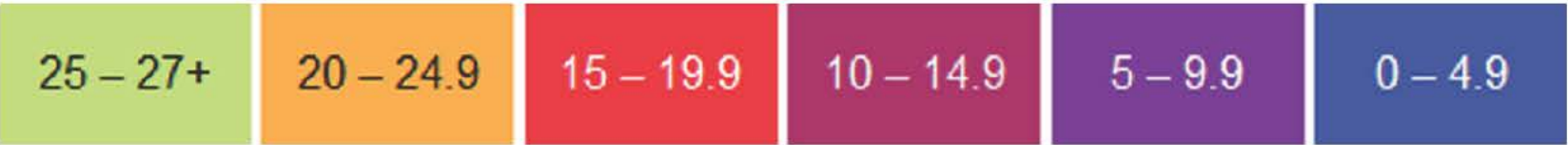
Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
1 to 48 Wheler House	R11/170	W36/170	Assumed hall/bathroom	0.88	0.01	0.87	98.86								
		W37/170		6.29	2.50	3.79	60.25								
		W38/170		2.13	0.28	1.85	86.85								
		W39/170		1.59	0.08	1.51	94.97	52.73	22.97	29.76	56.57	0.13	0.02	0.11	83.46
	R30/170	W23/170	Assumed hall/bathroom	10.36	6.63	3.73	36.00								
		W24/170		3.97	1.19	2.78	70.03								
		W26/170		0.10	0.00	0.10	100.00								
		W27/170		3.86	1.70	2.16	55.96	69.69	34.50	35.19	50.42	0.08	0.04	0.05	55.95
	R31/170	W21/170	Assumed kitchen	6.64	2.86	3.78	56.93								
		W22/170		6.39	2.77	3.62	56.65	73.46	67.06	6.40	8.71	0.32	0.16	0.16	50.46
	R32/170	W16/170	Assumed hall/bathroom	5.51	2.00	3.51	63.70								
		W18/170		0.06	0.00	0.06	100.00								
		W19/170		11.56	7.45	4.11	35.55								
		W20/170		4.31	1.17	3.14	72.85	67.26	49.04	18.23	26.99	0.12	0.06	0.06	49.15
	R33/170	W13/170	Assumed bedroom	6.80	3.41	3.39	49.85	79.06	64.47	14.59	18.56	0.33	0.19	0.14	41.99
	R34/170	W8/170	Assumed hall/bathroom	13.17	8.65	4.52	34.32								
		W9/170		5.47	1.95	3.52	64.35								
		W11/170		0.24	0.07	0.17	70.83								
		W12/170		8.03	3.82	4.21	52.43	75.90	61.38	14.52	19.13	0.14	0.08	0.06	44.53
	R36/170	W1/170	Assumed hall/bathroom	4.77	1.63	3.14	65.83								
		W3/170		0.33	0.02	0.31	93.94								
		W4/170		11.42	6.90	4.52	39.58								
		W5/170		5.02	1.60	3.42	68.13	74.71	47.80	26.91	36.02	0.11	0.06	0.05	45.61
	R17/171	W34/171	Assumed hall/bathroom	10.08	4.91	5.17	51.29								
		W35/171		4.11	0.94	3.17	77.13								
		W36/171		9.28	4.23	5.05	54.42								
		W37/171		5.42	1.62	3.80	70.11								
		W38/171		3.63	0.56	3.07	84.57	73.29	62.88	10.42	14.21	0.24	0.10	0.13	57.02
	R15/172	W6/172	Assumed kitchen	13.22	4.85	8.37	63.31	78.04	59.71	18.33	23.39	0.26	0.13	0.13	49.81
	R17/172	W31/172	Assumed hall/bathroom	10.10	4.23	5.87	58.12								
		W32/172		3.05	0.28	2.77	90.82								
		W33/172		9.53	3.73	5.80	60.86								
		W34/172		4.93	1.08	3.85	78.09								
		W35/172		3.55	0.27	3.28	92.39	75.85	64.28	11.57	15.33	0.23	0.08	0.15	65.09
	R25/172	W19/172	Assumed hall/bathroom	15.42	8.00	7.42	48.12								
		W20/172		8.91	2.26	6.65	74.64								
		W21/172		12.71	5.77	6.94	54.60								
		W24/172		3.97	0.51	3.46	87.15								
		W25/172		7.82	2.87	4.95	63.30	89.47	67.89	21.58	24.12	0.25	0.11	0.14	56.40

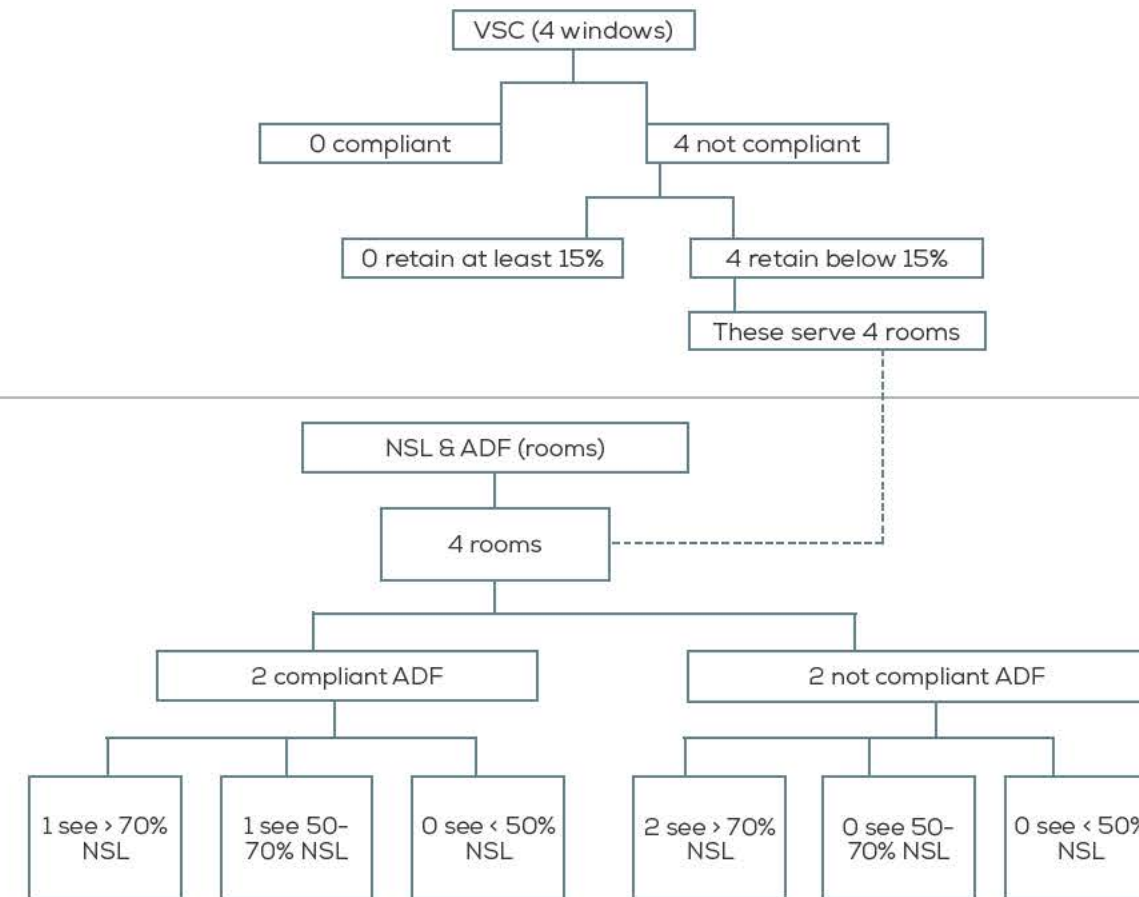


Proposed



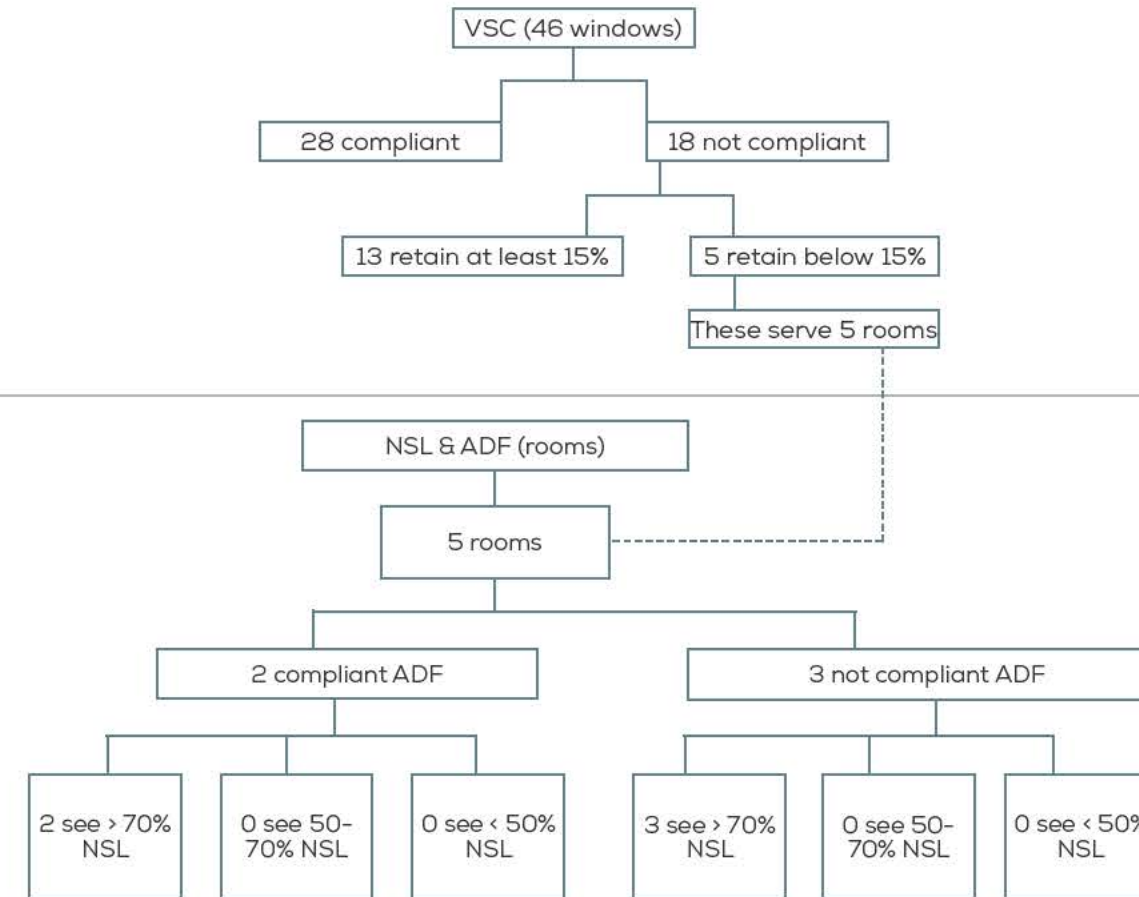
Proposed - without balconies





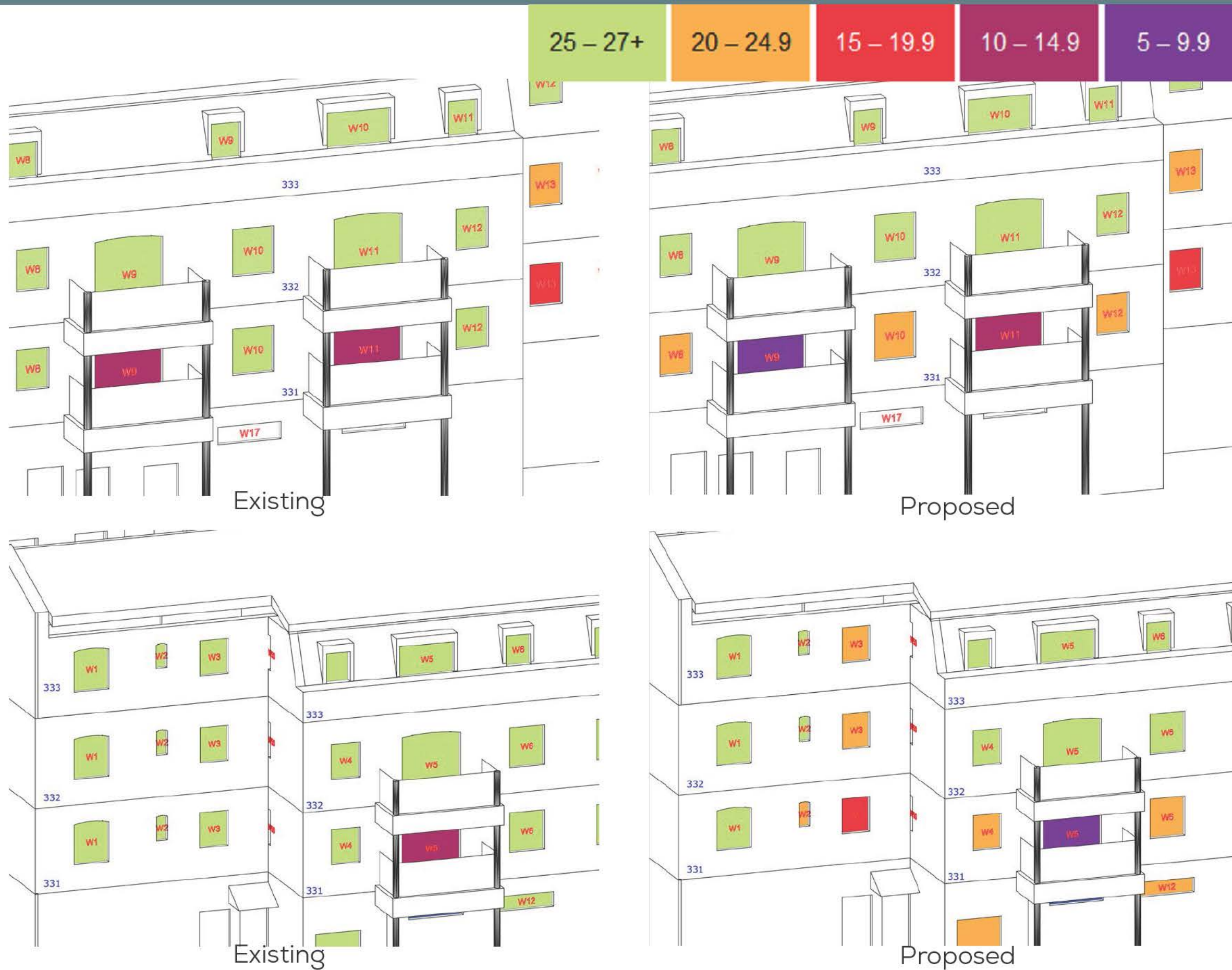
- Over 100m from site.
- Recessed balconies.
- Without balconies meet VSC criteria or retain at least 15%.

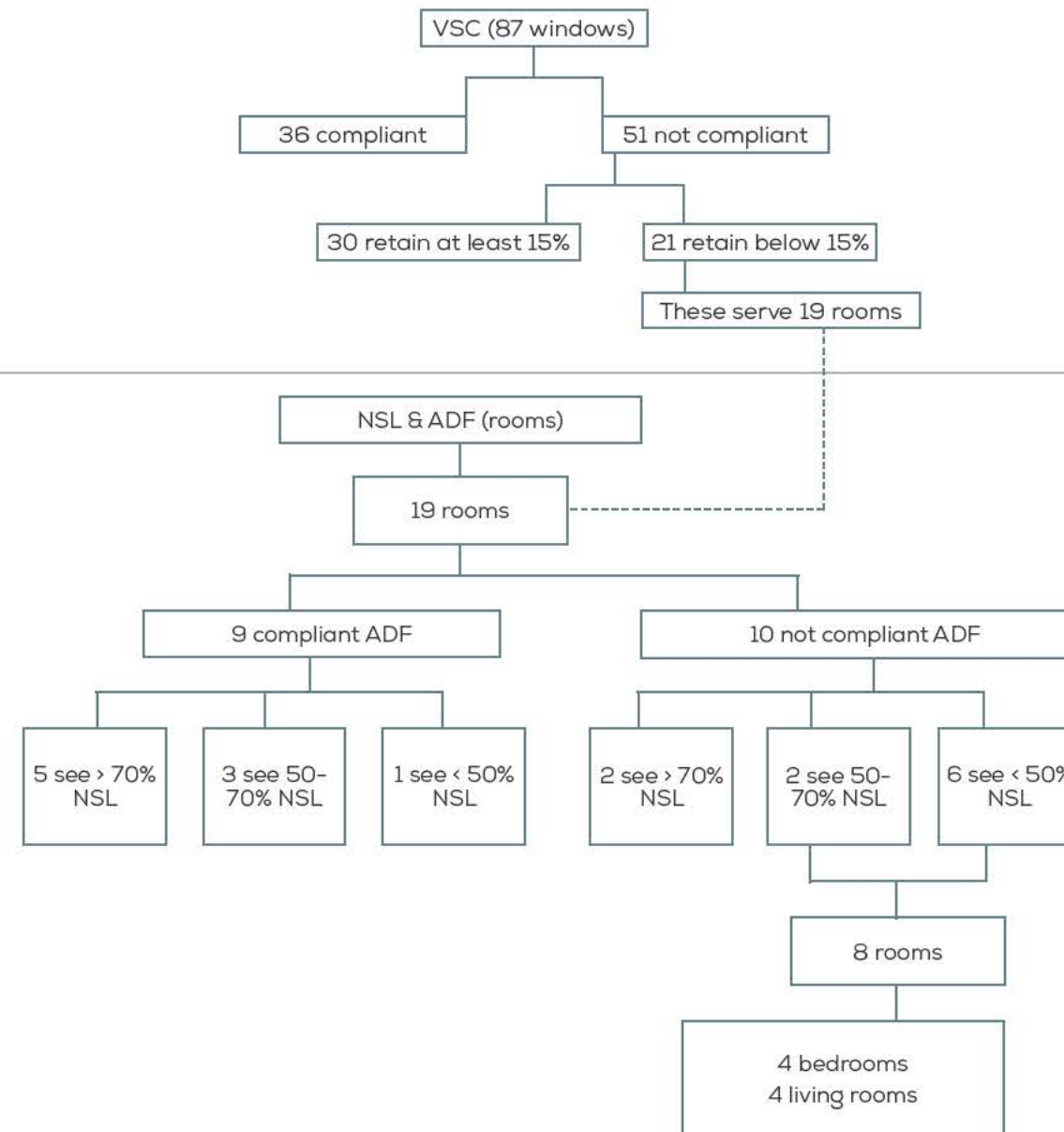




- **Affected rooms retain distribution to >80% room area.**





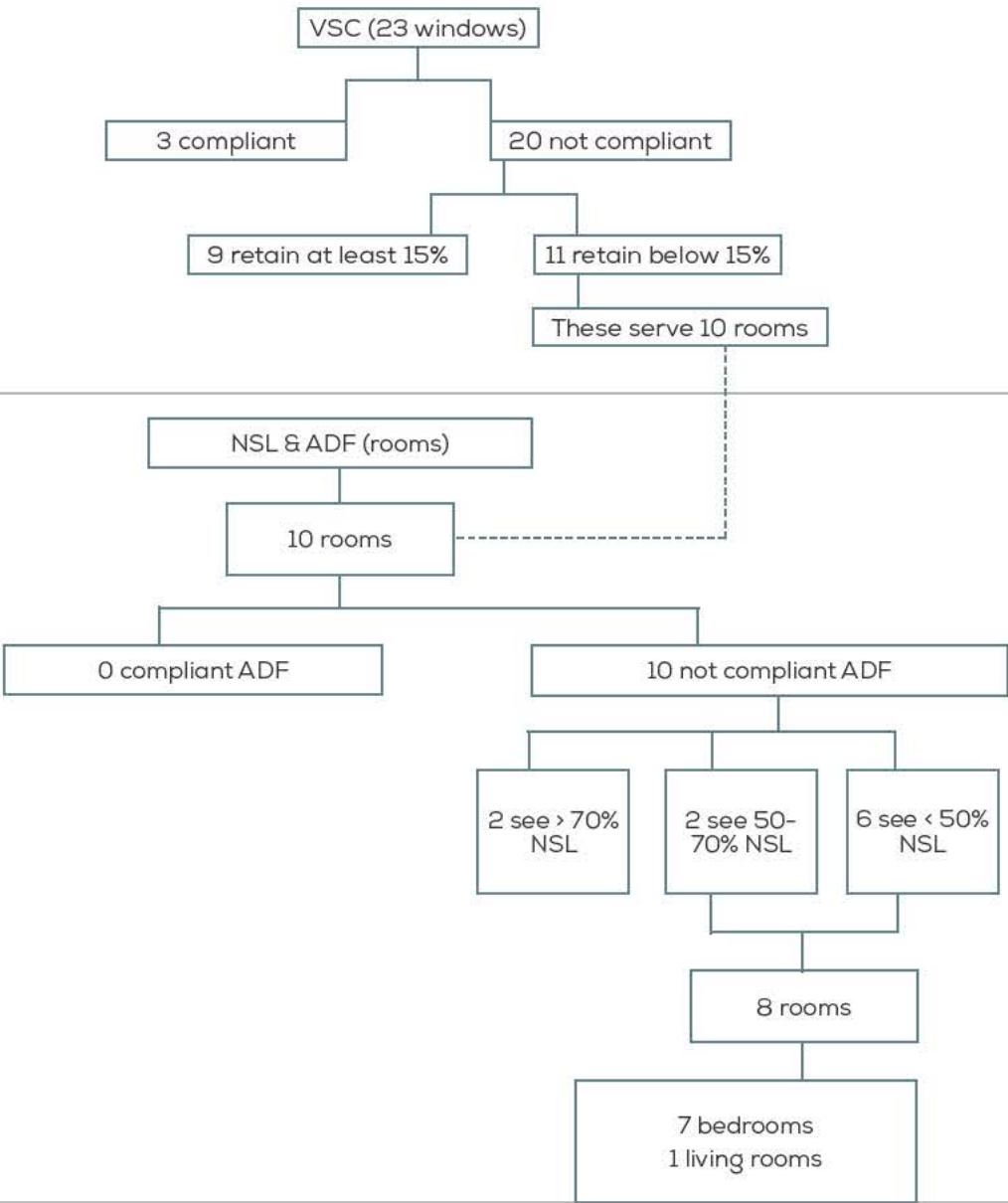


- **Balconies/overhang on ground floor.**
- **Almost all retain 15% without balconies.**



Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
25 WHELER STREET	R5/910	W9/910	BEDROOM	4.42	0.60	3.82	86.43	40.49	5.15	35.34	87.28	0.27	0.05	0.22	80.60
	R6/910	W8/910	BEDROOM	5.11	0.52	4.59	89.82	20.81	16.25	4.56	21.90	0.35	0.06	0.29	83.95
	R7/910	W6/910	LIVINGROOM	7.10	0.44	6.66	93.80	94.14	48.97	45.18	47.94	1.31	0.40	0.91	69.59
		W7/910		13.78	3.85	9.93	72.06								
	R8/910	W5/910	LKD	3.29	0.00	3.29	100.00	40.71	5.81	34.90	85.62	0.39	0.01	0.38	97.16
	R9/910	W4/910	BEDROOM	0.96	0.00	0.96	100.00	30.70	0.00	30.70	100.00	0.27	0.00	0.27	99.63
	R12/911	W6/911	LKD	27.27	16.71	10.56	38.72	94.52	53.50	41.02	43.40	1.39	0.78	0.61	43.89
		W7/911		16.97	6.48	10.49	61.81								
	R10/912	W6/912	LKD	29.98	19.60	10.38	34.62	94.66	63.22	31.44	33.21	1.51	0.96	0.56	36.81
		W7/912		18.81	8.40	10.41	55.34								
	R3/914	W13/914	BEDROOM	9.74	2.24	7.50	77.00	36.27	35.09	1.18	3.25	0.43	0.17	0.25	59.48

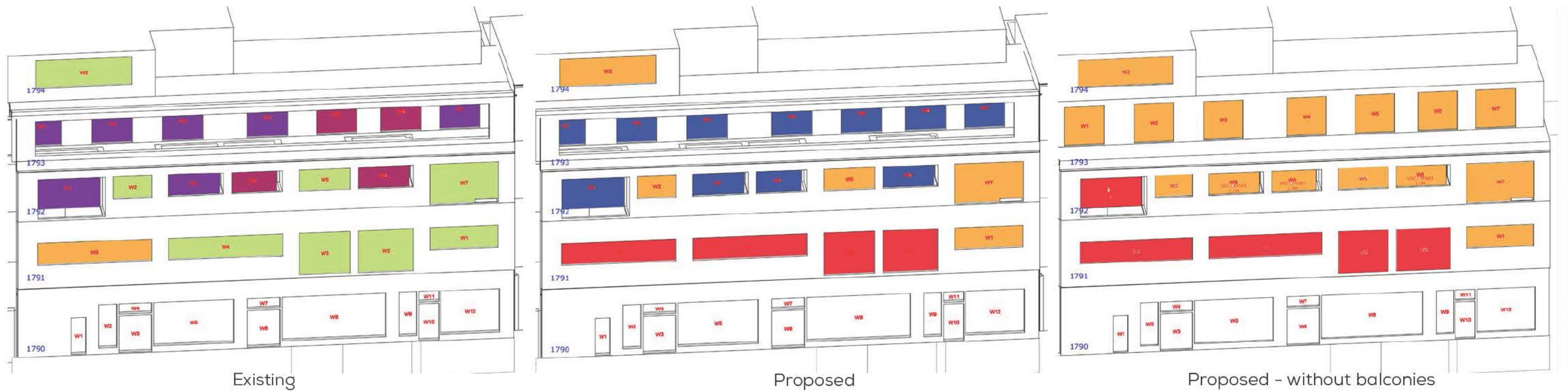


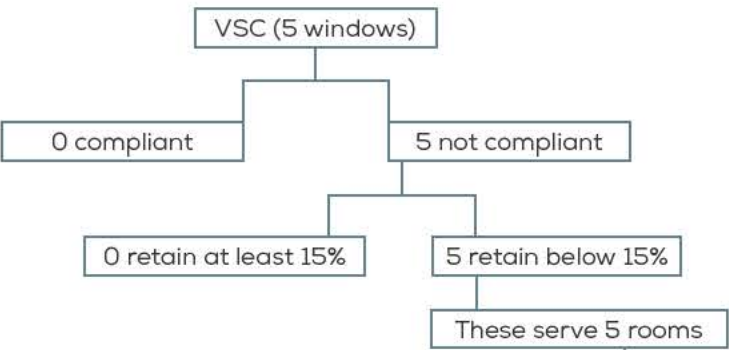


- **Balconies and tunnelled perspective down Ebor Street.**
- **All retain 15% VSC without balconies.**

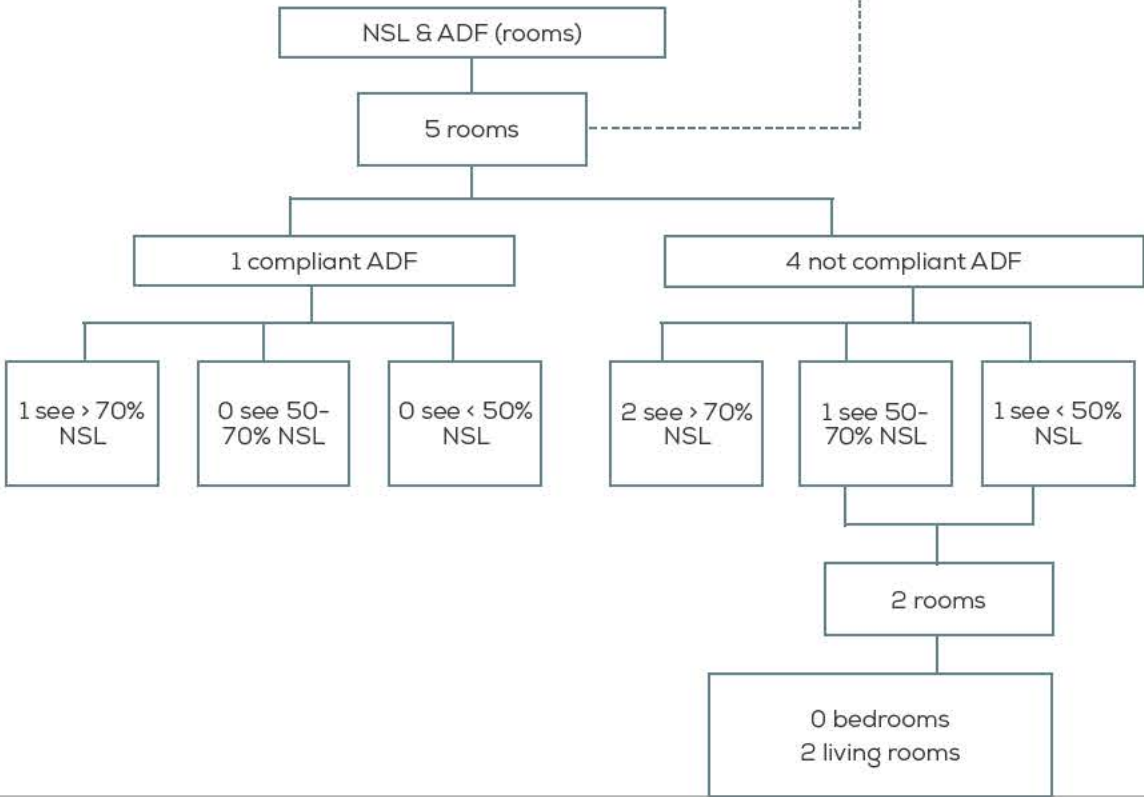


Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
19-29 REDCHURCH STREET	R1/1792	W1/1792	LKD	6.70	1.31	5.39	80.45	92.47	12.23	80.25	86.75	0.81	0.19	0.63	77.12
	R3/1792	W3/1792	BEDROOM	9.68	1.90	7.78	80.37	99.83	20.13	79.70	79.83	1.29	0.28	1.01	78.27
	R4/1792	W4/1792	BEDROOM	10.29	1.97	8.32	80.86	99.67	38.14	61.53	61.73	1.33	0.41	0.91	68.83
	R1/1793	W1/1793	BEDROOM	5.35	0.53	4.82	90.09	68.09	14.48	53.61	78.73	0.62	0.17	0.45	72.73
	R2/1793	W2/1793	BEDROOM	7.84	0.91	6.93	88.39	91.60	26.01	65.59	71.60	0.81	0.21	0.60	73.96
	R3/1793	W3/1793	BEDROOM	8.72	0.79	7.93	90.94	74.81	16.99	57.82	77.29	0.82	0.18	0.64	77.62
	R4/1793	W4/1793	BEDROOM	9.51	0.75	8.76	92.11	99.48	58.86	40.62	40.91	1.13	0.29	0.84	74.47
	R5/1793	W5/1793	BEDROOM	10.05	0.75	9.30	92.54	96.68	68.62	28.07	29.03	0.94	0.29	0.65	69.50

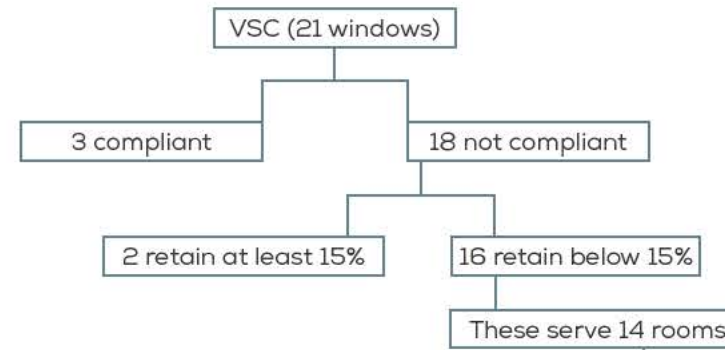
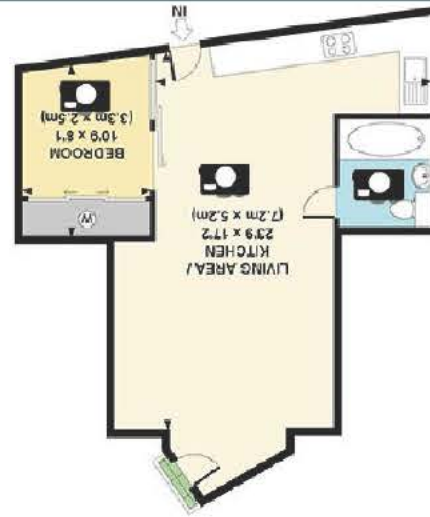




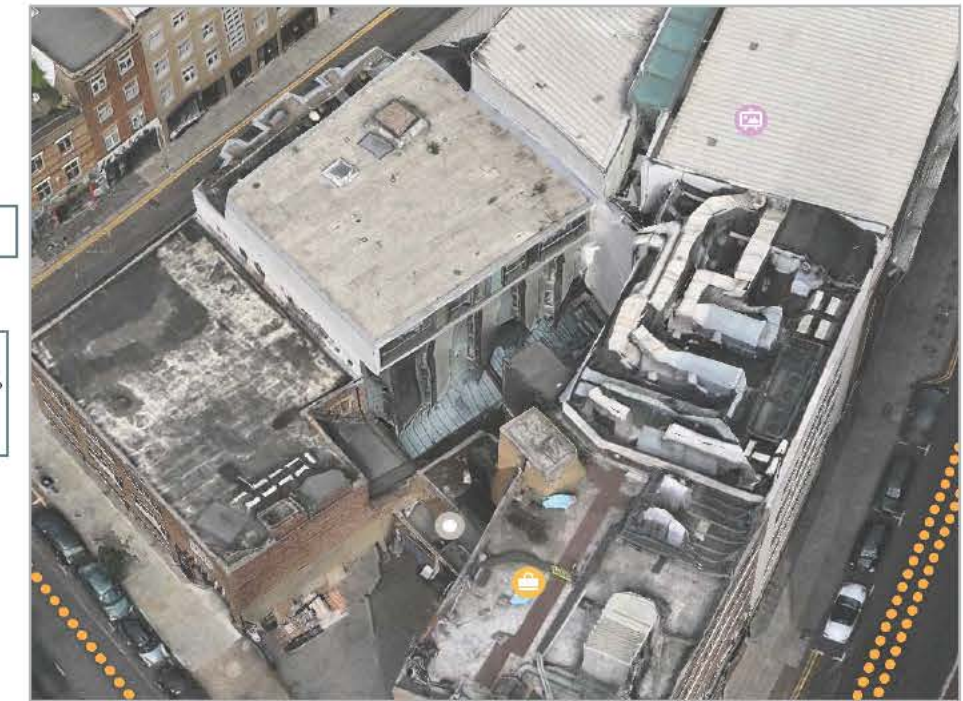
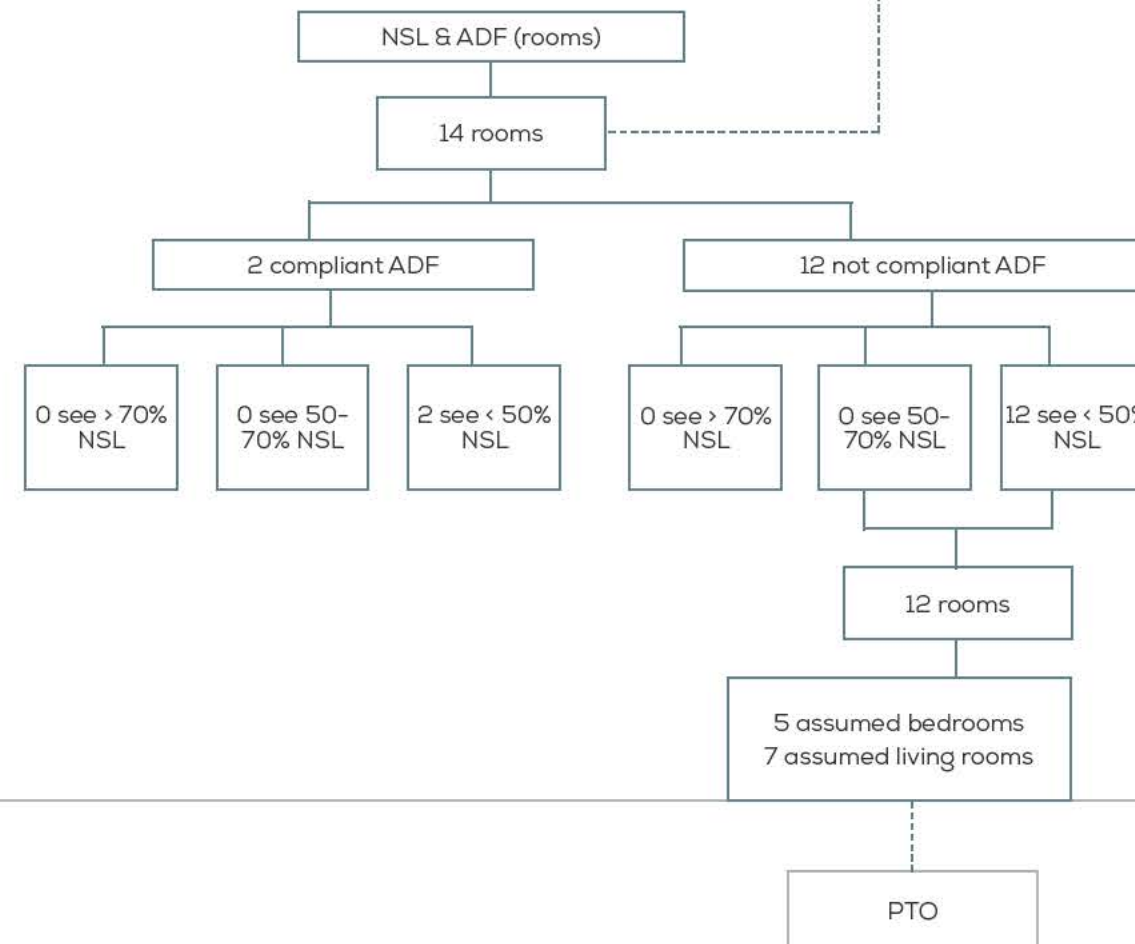
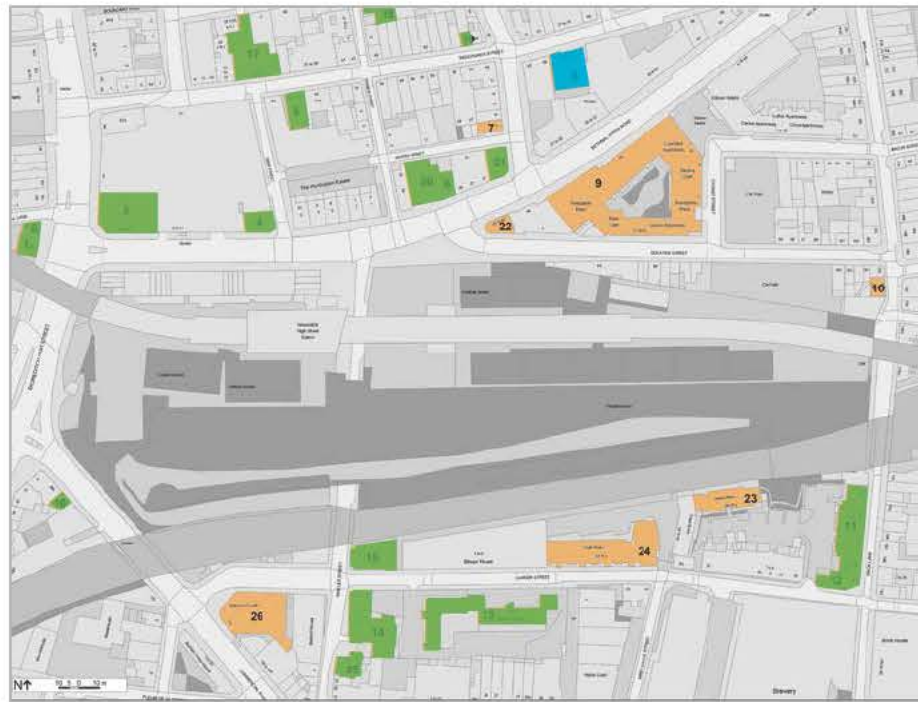
• All rooms retain >50% daylight distribution with the exception of the top floor dormer (48% distribution).



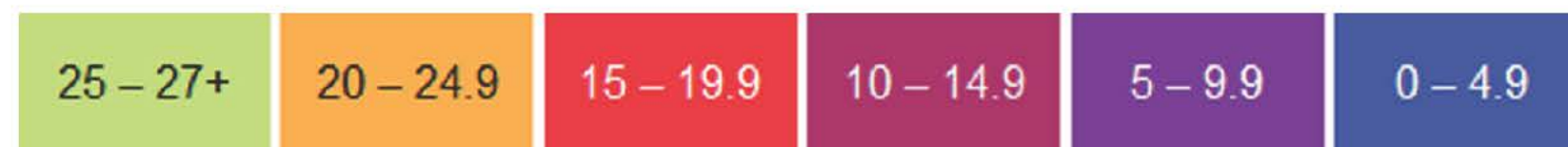
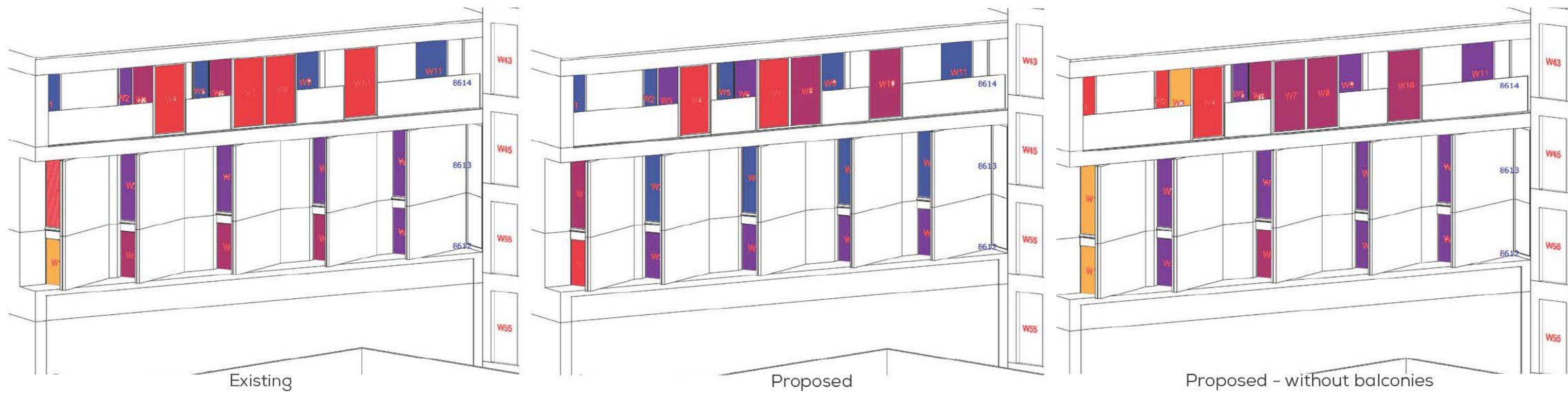
Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
17 BETHNAL GREEN ROAD	R1/402	W1/402	LKD	33.63	12.84	20.79	61.82	97.08	68.35	28.73	29.59	1.08	0.56	0.52	48.24
	R1/403	W1/403	LIVINGROOM	34.84	13.53	21.31	61.17	88.24	47.82	40.42	45.75	0.47	0.21	0.26	54.70



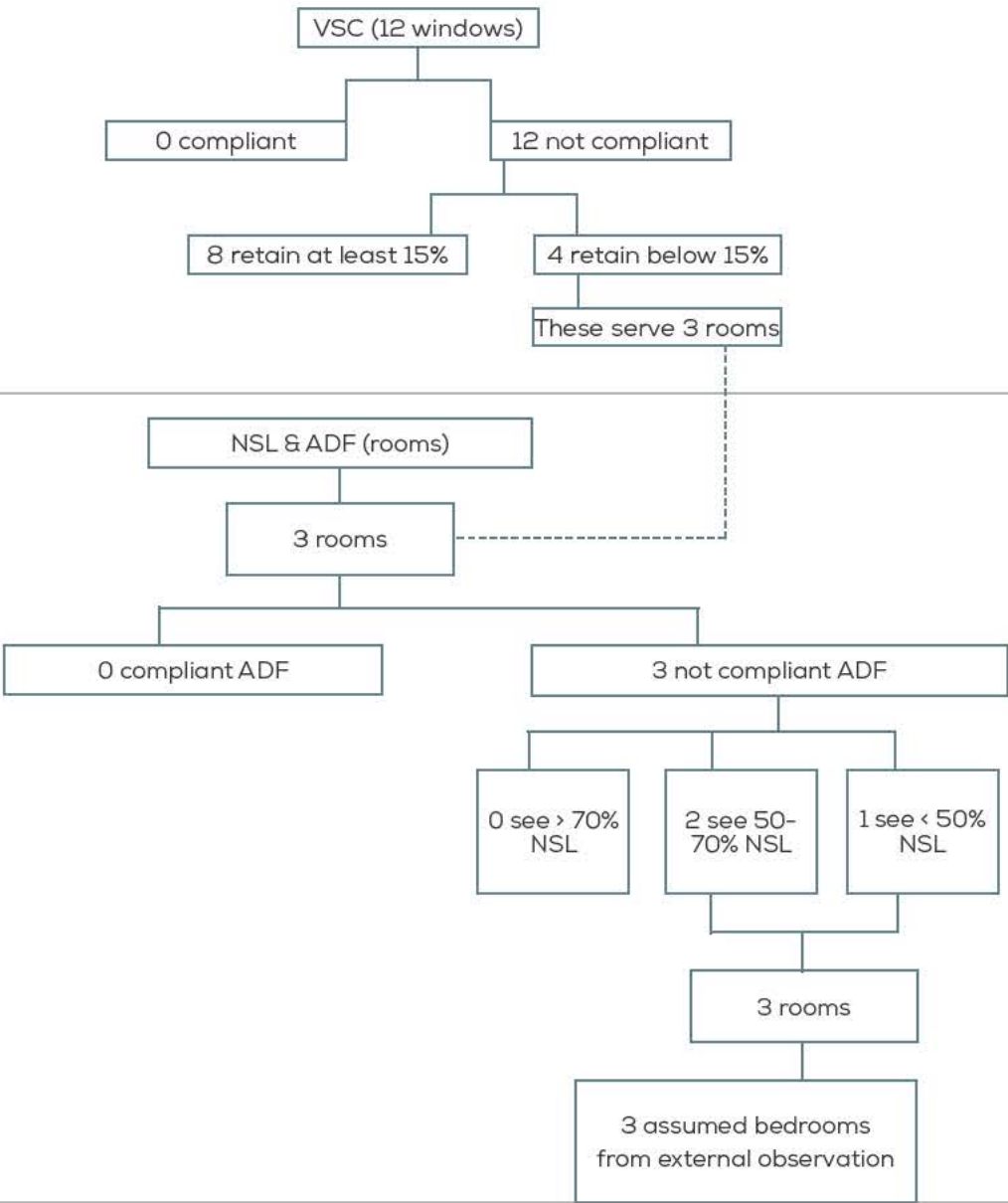
- Overhung narrow angled apertures overlooking blocks A and B.
- Over 140m away from site.
- Located in an existing constrained courtyard.



Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
70 Redchurch Street	R2/8612	W2/8612	Assumed Bedroom	11.67	7.38	4.29	36.76	54.56	33.27	21.28	39.13	0.47	0.36	0.11	23.89
	R3/8612	W3/8612	Assumed Bedroom	11.83	8.12	3.71	31.36	48.08	32.80	15.28	31.79	0.49	0.39	0.10	20.98
	R1/8613	W1/8613	Assumed Livingroom	19.40	13.34	6.06	31.24	42.65	20.36	22.29	52.26	0.62	0.44	0.18	29.58
	R2/8613	W2/8613	Assumed Livingroom	9.38	4.11	5.27	56.18	55.29	19.82	35.47	64.16	0.45	0.16	0.29	64.73
	R3/8613	W3/8613	Assumed Livingroom	8.81	4.40	4.41	50.06	47.90	19.55	28.34	59.17	0.44	0.17	0.27	61.36
	R4/8613	W4/8613	Assumed Livingroom	7.27	3.79	3.48	47.87	37.33	19.63	17.70	47.42	0.43	0.17	0.26	60.61
	R5/8613	W5/8613	Assumed Livingroom	6.97	4.30	2.67	38.31	33.21	20.63	12.58	37.89	0.41	0.20	0.21	51.94
	R1/8614	W1/8614	Assumed Bedroom	2.88	1.52	1.36	47.22	53.08	13.56	39.53	74.61	0.24	0.10	0.15	60.66
	R2/8614	W2/8614	Assumed Livingroom	7.89	1.64	6.25	79.21								
		W3/8614		14.75	8.49	6.26	42.44								
		W4/8614		19.83	15.57	4.26	21.48	47.27	28.85	18.42	38.97	1.76	1.18	0.58	32.93
	R3/8614	W5/8614	Assumed Livingroom	3.81	0.94	2.87	75.33								
		W6/8614		13.58	8.19	5.39	39.69								
		W7/8614		18.50	15.06	3.44	18.59								
		W8/8614		17.91	14.72	3.19	17.81	53.48	29.58	23.90	44.60	1.83	1.39	0.44	24.04
	R4/8614	W9/8614	Assumed Bedroom	1.53	0.54	0.99	64.71								
		W10/8614		16.22	13.55	2.67	16.46	35.81	18.77	17.04	47.78	0.94	0.75	0.19	20.02
	R5/8614	W11/8614	Assumed Bedroom	2.18	0.20	1.98	90.83	12.46	3.62	8.83	71.36	0.17	0.05	0.11	67.47

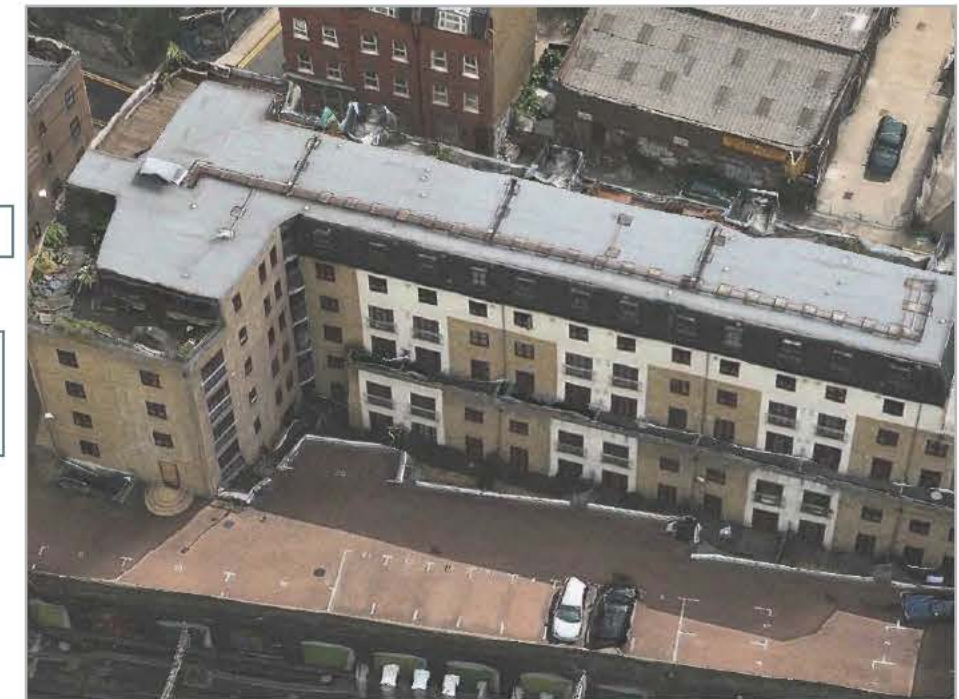
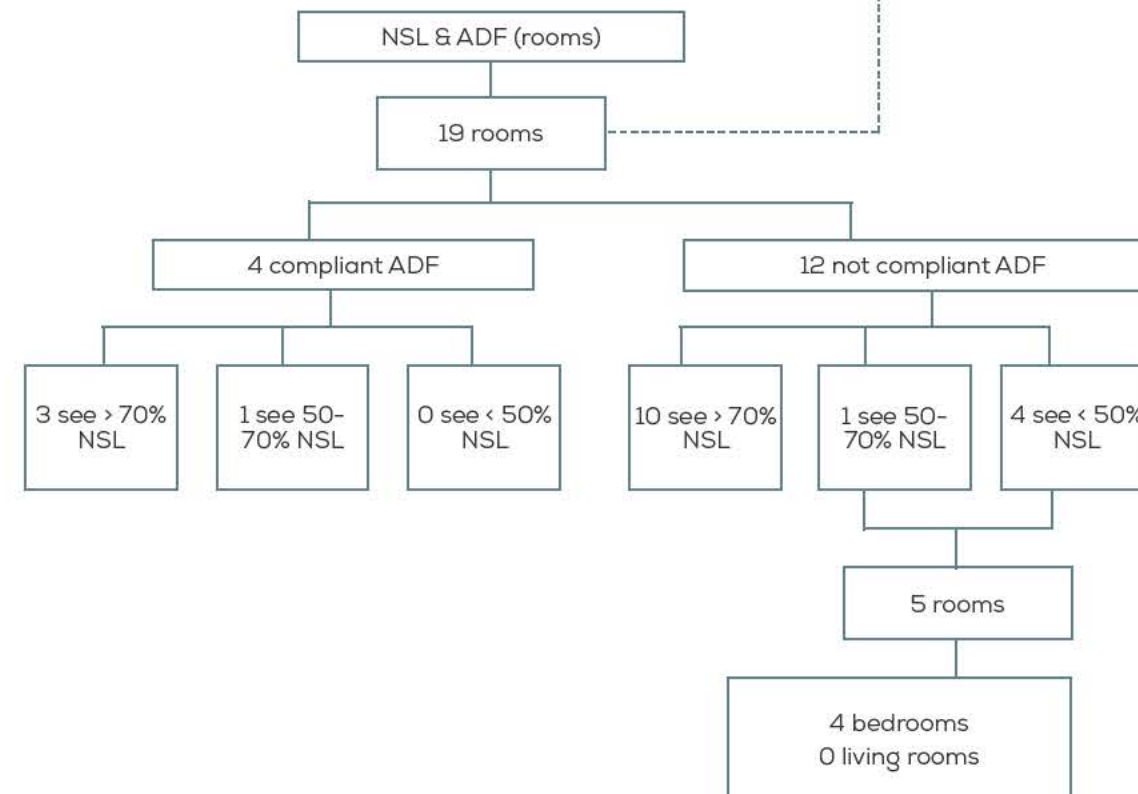
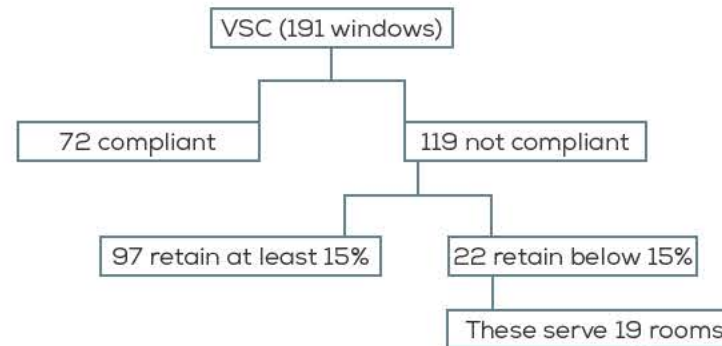


- Daylight potential completely reliant across site due to obstruction on flank.
- Development raised above railway and any development would result in an impact to this property.

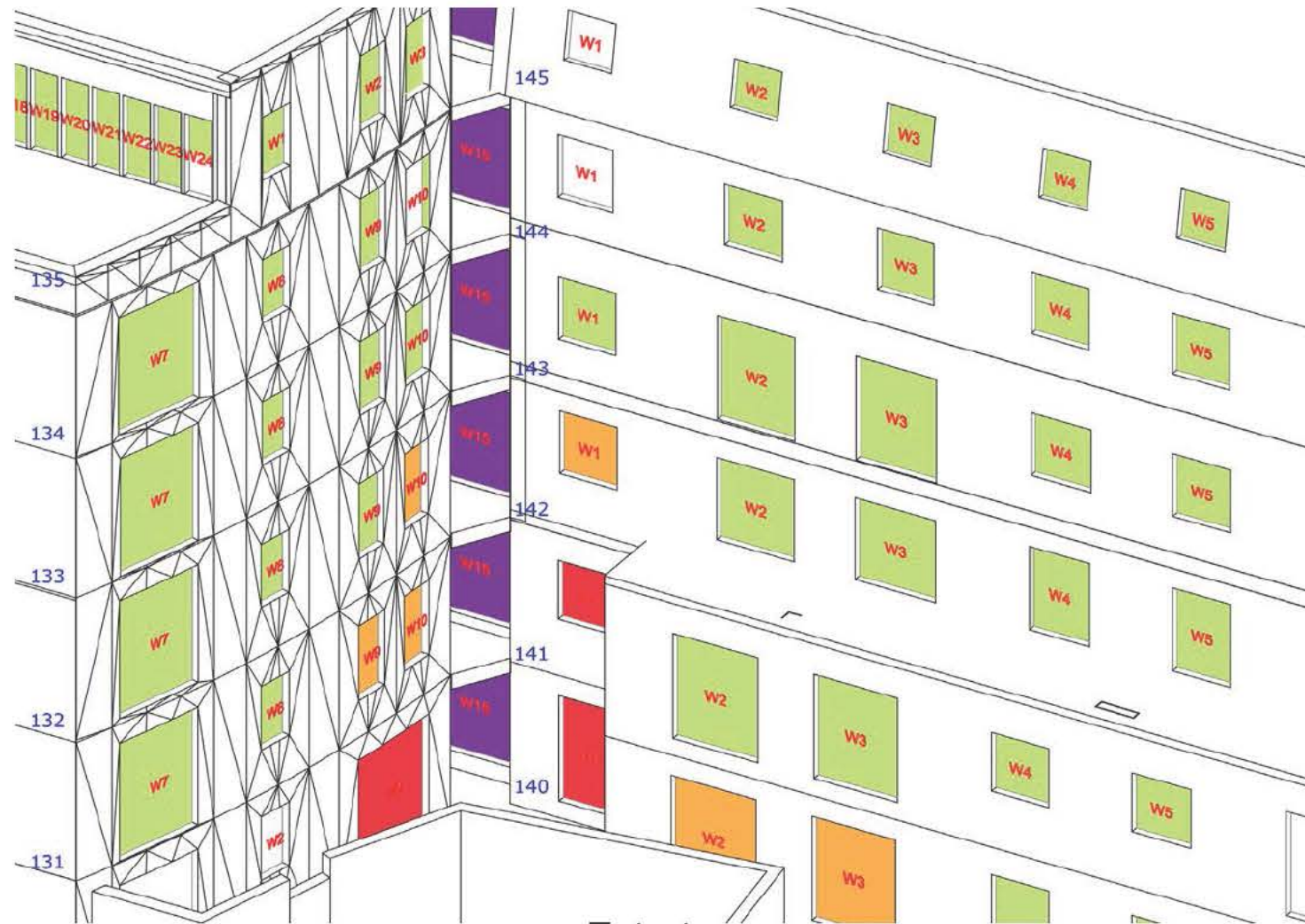


Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
119 BRICK LANE	R2/211	W1/211	Bedroom from ext. observation	16.50	9.62	6.88	41.70								
		W2/211		19.68	11.62	8.06	40.96	87.36	51.07	36.29	41.45	1.27	0.93	0.35	27.20
	R2/212	W1/212	Bedroom from ext. observation	19.19	11.17	8.02	41.79								
		W2/212		23.60	14.60	9.00	38.14	96.75	65.84	30.91	31.95	1.35	0.98	0.37	27.33
	R1/221	W1/221	Bedroom from ext. observation	22.44	12.87	9.57	42.65	88.27	44.94	43.33	49.09	0.78	0.56	0.23	28.81

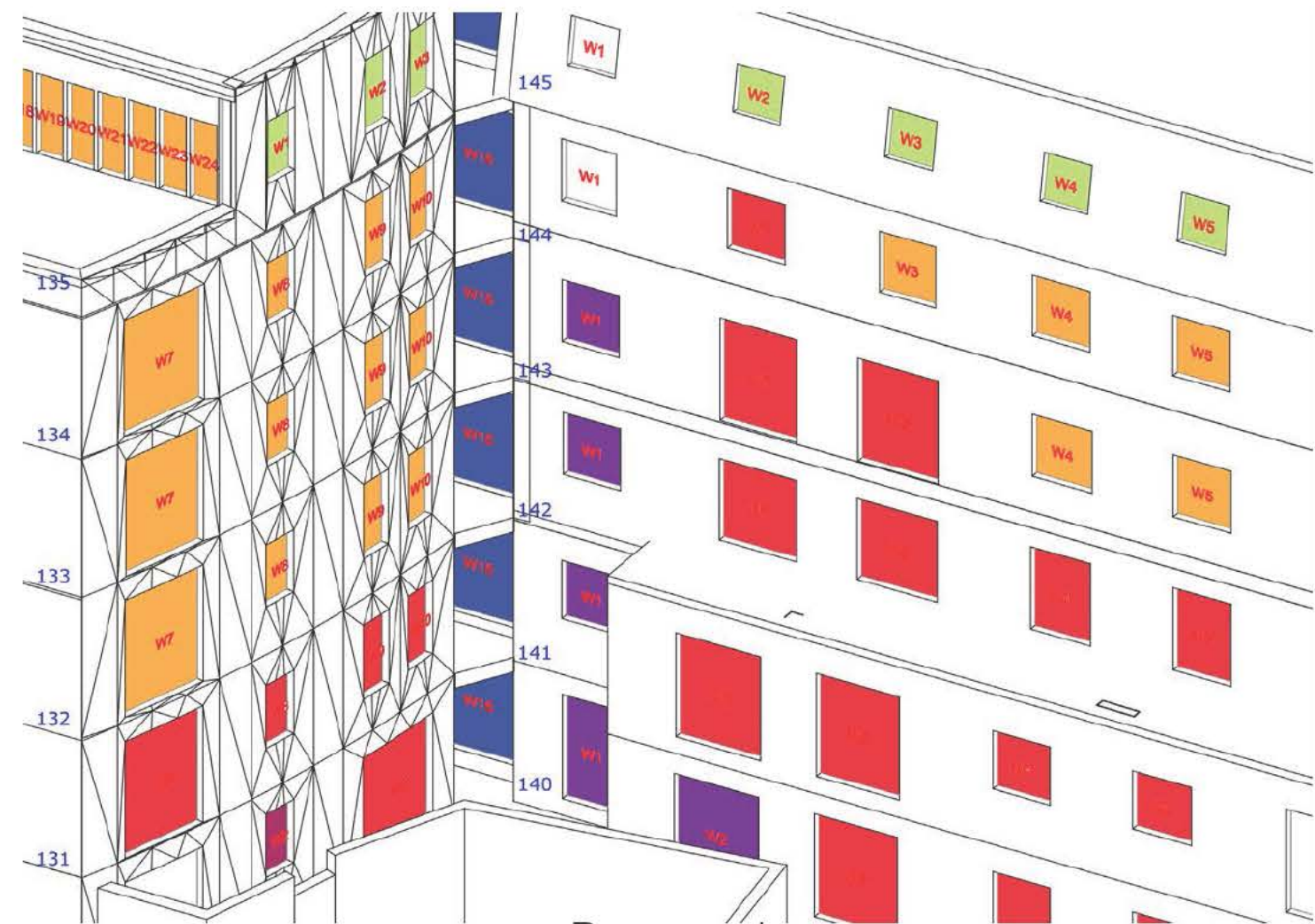
- **Directly facing onto vacant development site.**
- **Recess in corner of building restricts potential for good daylight.**
- **Remaining rooms located adjacent flank elevation**



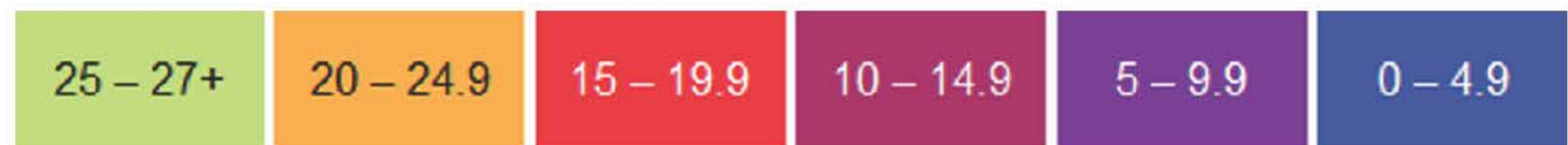
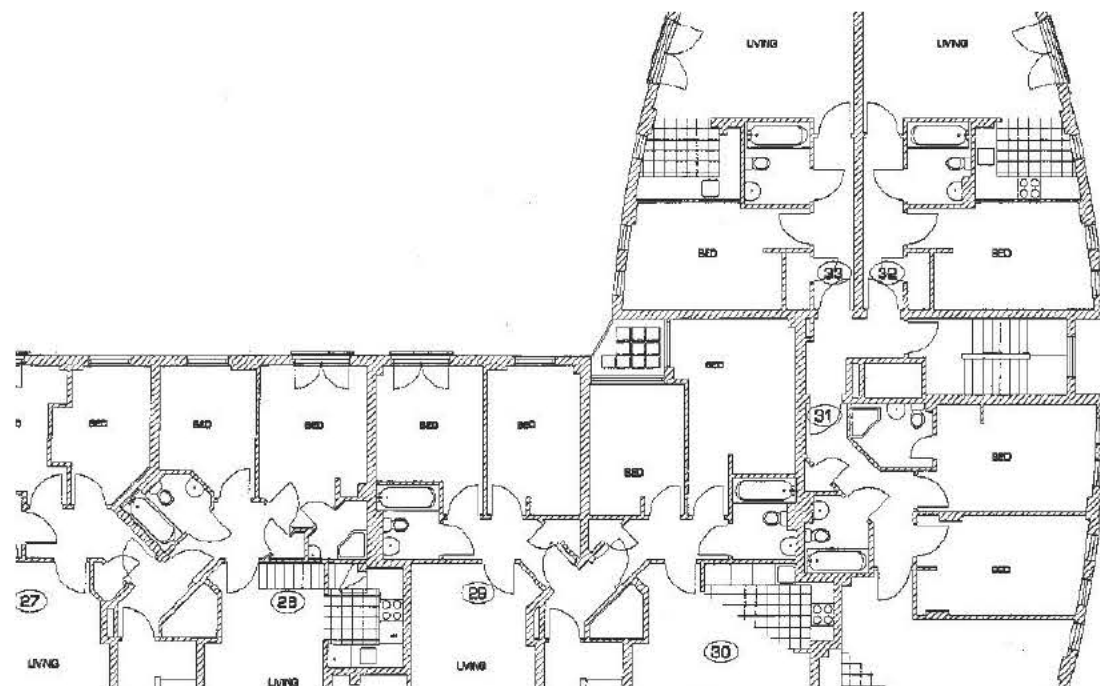
Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
1 to 42 Eagle House	R16/140	W16/140	BEDROOM	2.06	0.52	1.54	74.76	41.79	17.67	24.13	57.73	0.23	0.02	0.20	89.33
	R8/141	W15/141	OFFICE	7.38	1.51	5.87	79.54								
		W16/141		0.68	0.17	0.51	75.00								
		W17/141		0.34	0.00	0.34	100.00	56.56	23.77	32.79	57.98	0.47	0.13	0.34	72.81
	R16/142	W16/142	BEDROOM	5.12	2.24	2.88	56.25	61.67	49.32	12.35	20.02	0.41	0.21	0.20	48.79
	R16/143	W16/143	BEDROOM	5.20	2.22	2.98	57.31	60.90	49.58	11.32	18.59	0.42	0.22	0.20	48.33
	R16/144	W16/144	BEDROOM	5.75	2.66	3.09	53.74	60.96	50.61	10.35	16.98	0.45	0.25	0.20	45.07



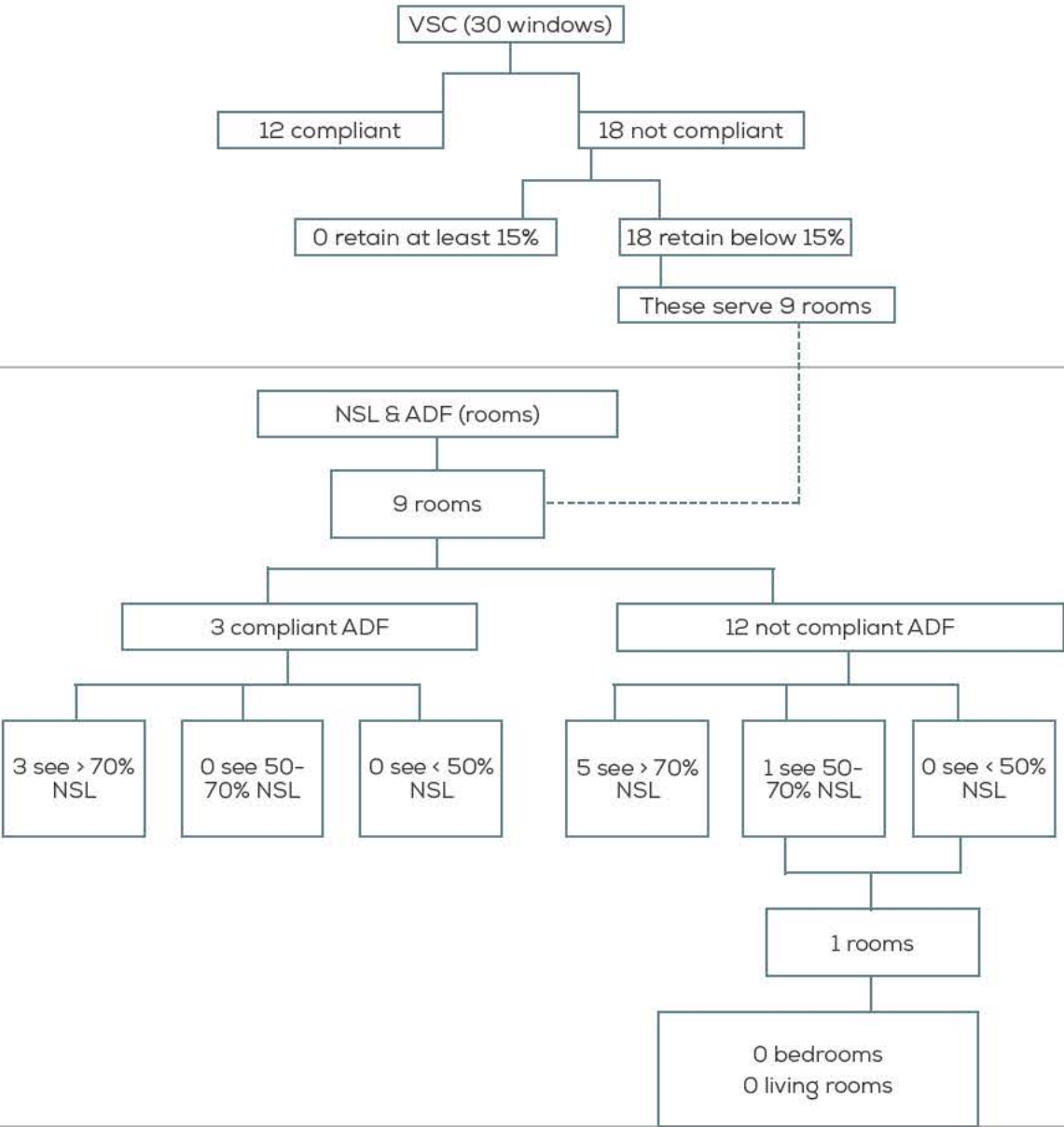
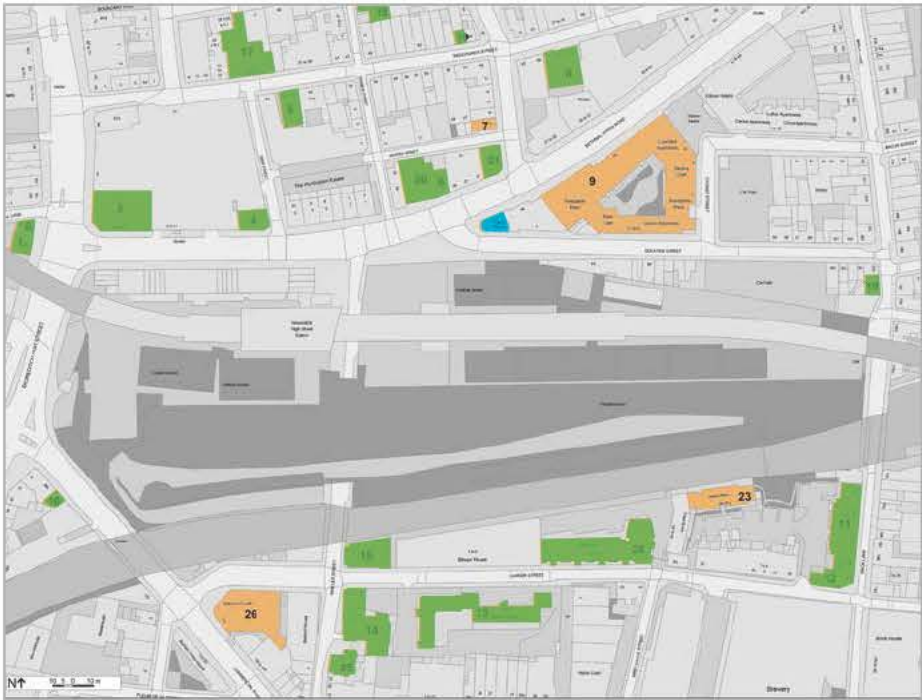
Existing



Proposed

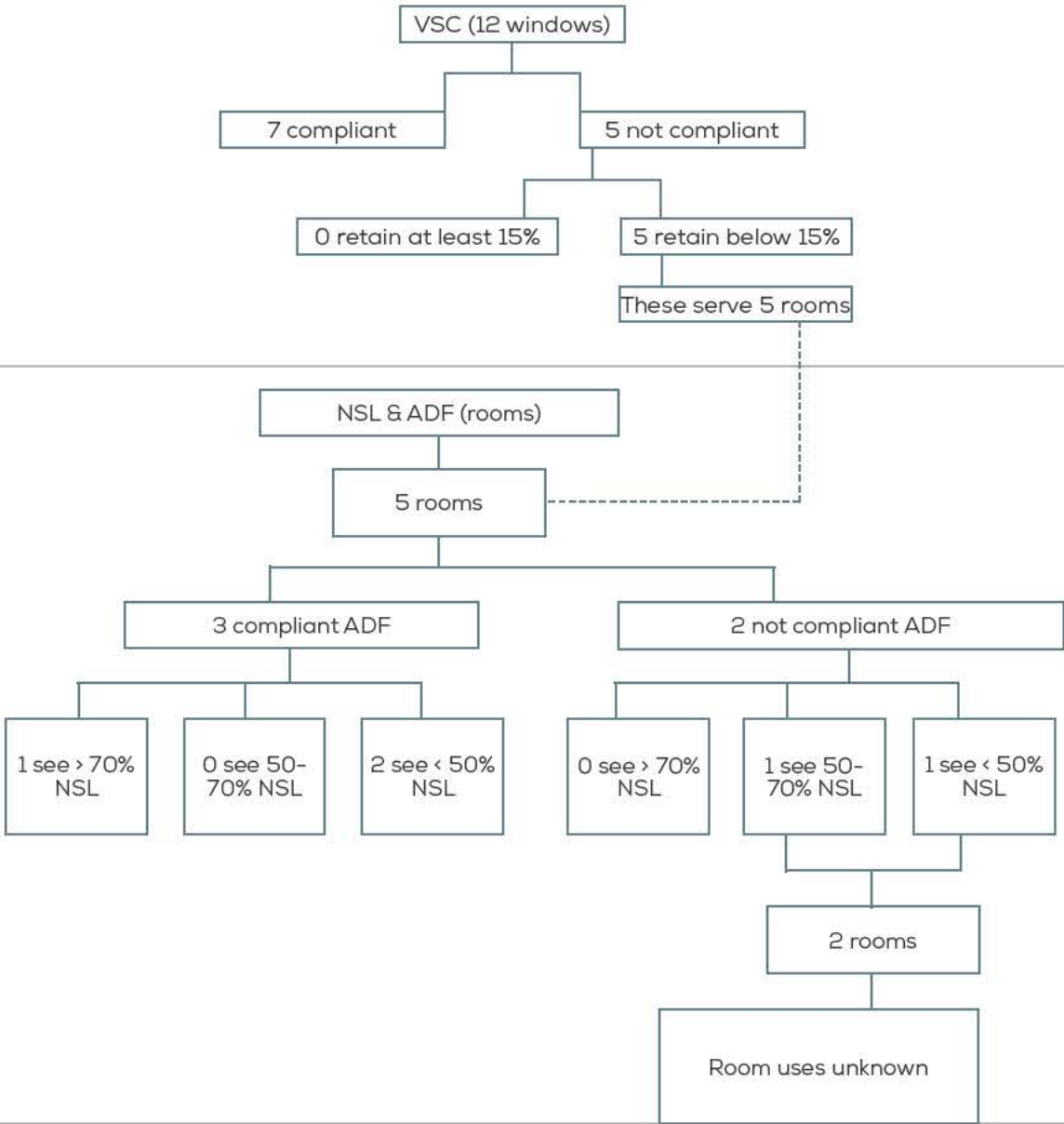


• All living rooms retain good daylight by reference to ADF given mitigating windows unaffected by the development.



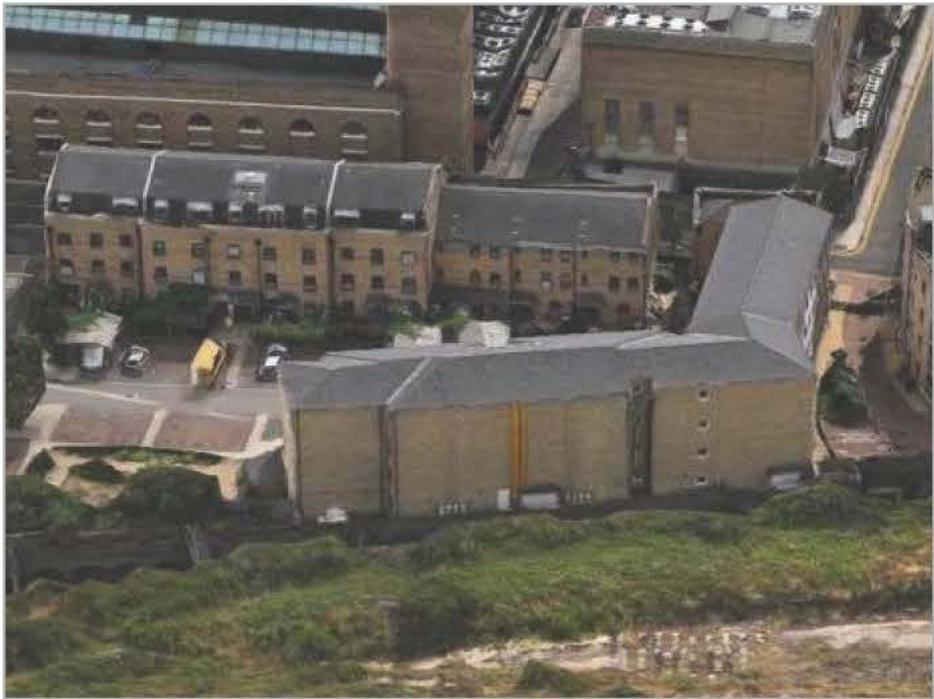
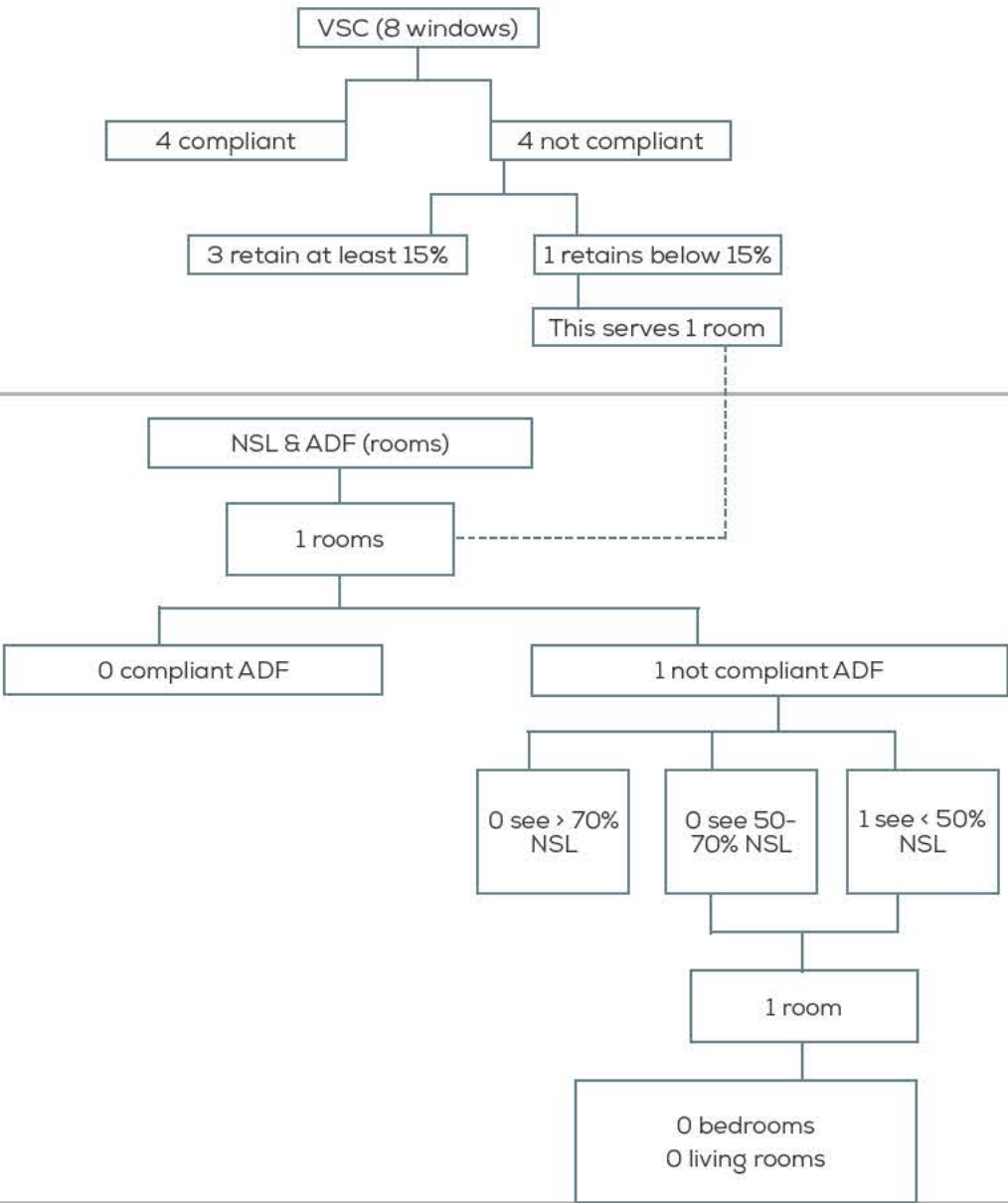
Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
28-30 BETHNAL GREEN ROAD	R1/905	W1/905	hall	33.37	6.39	26.98	80.85	97.33	60.13	37.21	38.17	1.15	0.32	0.84	72.57
		W2/905	bathroom	33.36	6.30	27.06	81.12								

• Commercial, however marketed as residential on Zoopla.



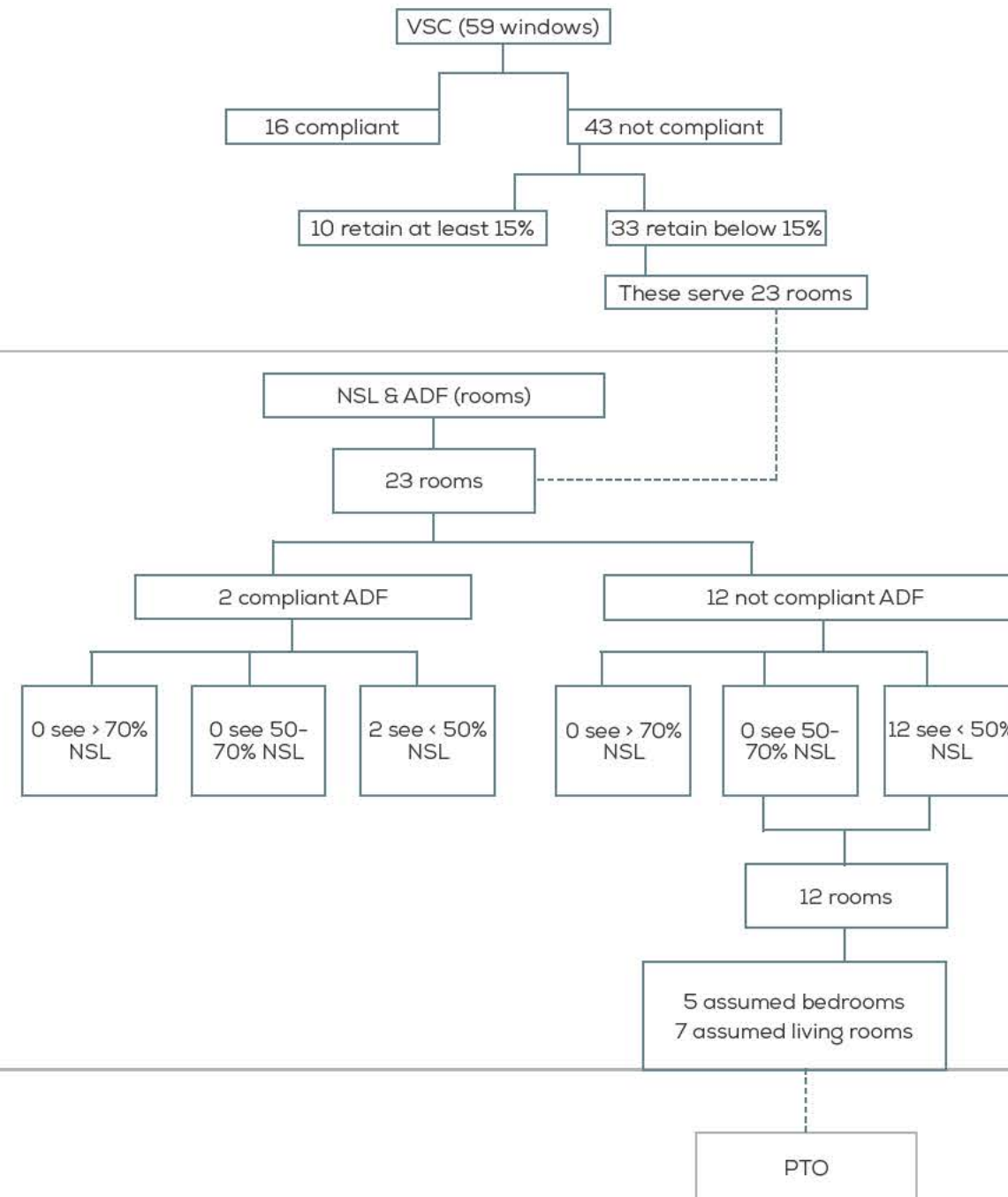
Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
3 Club Row	R2/8620	W2/8620		10.86	8.38	2.48	22.84	39.87	34.80	5.07	12.71	0.87	0.68	0.19	21.84
	R2/8621	W2/8621		15.85	11.63	4.22	26.62	65.65	56.49	9.16	13.81	0.67	0.49	0.18	26.87

- Windows primarily for circulation and windows on southern facade are main light source.
- All rooms retain good levels of daylight by reference to ADF if we tested through LKD.



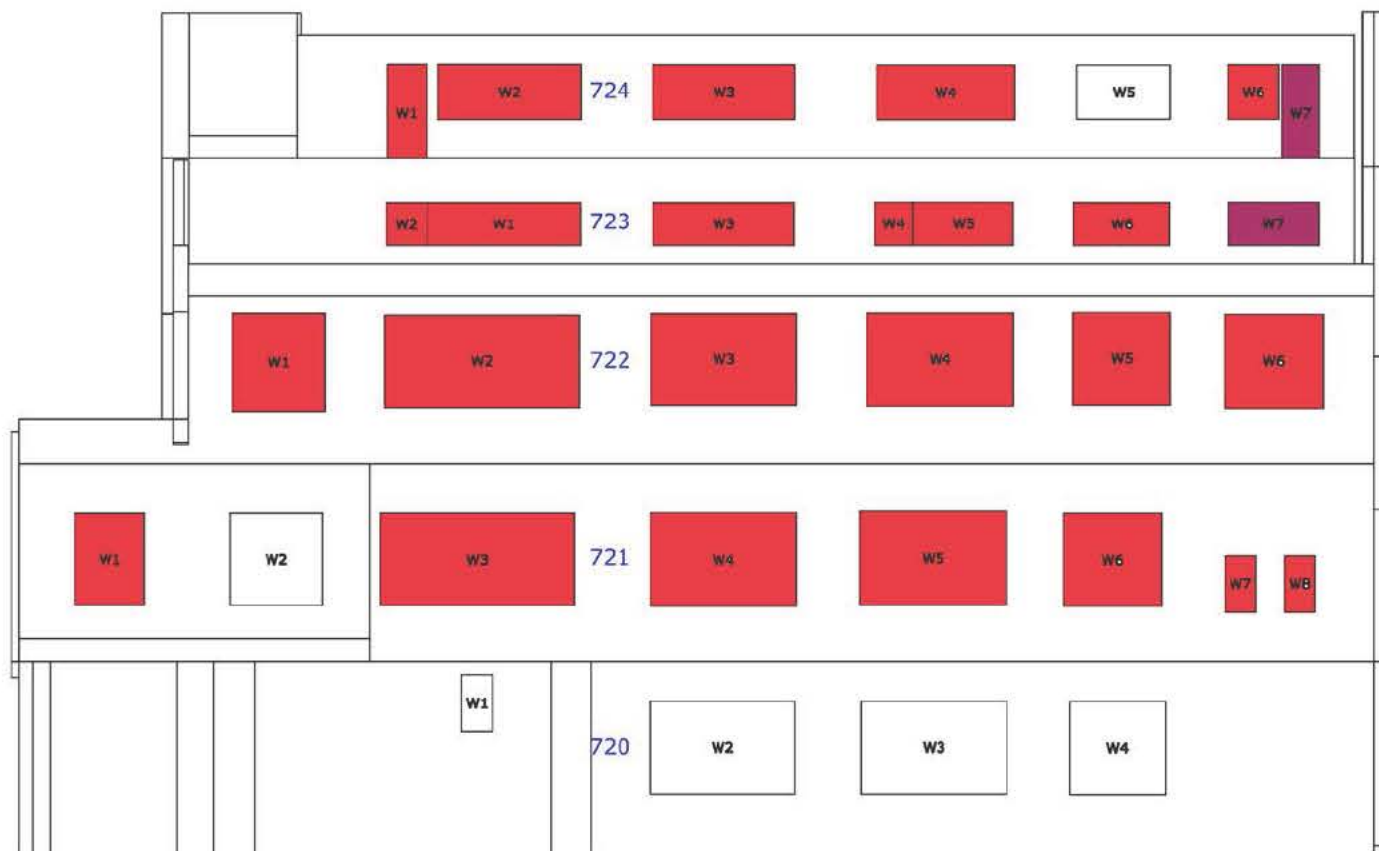
Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
1-16 SHEBA PLACE	R8/100	W3/100	KITCHEN	30.77	1.19	29.58	96.13	87.06	24.53	62.53	71.83	0.46	0.16	0.30	65.94

- Deep living room spaces of approximately 10m.
- Provision of office space in Plot K key driver.



- Located opposite site boundary facing a vacant site
- Ground floor is commercial
- Deep floor plate configuration (circa 10m deep living spaces). If these were curtailed the daylight distribution would be better.

Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
154 COMMERCIAL STREET (Hollywood Lofts)	R1/718	W1/718	BEDROOM	36.64	6.55	30.09	82.12								
		W2/718		36.84	5.97	30.87	83.79								
		W3/718		7.72	7.72	0.00	0.00	98.77	64.47	34.30	34.73	2.81	0.90	1.91	68.13
	R2/721	W3/721	LKD	36.97	5.42	31.55	85.34	99.49	11.99	87.51	87.95	2.75	0.66	2.09	76.08
	R3/721	W4/721	BEDROOM	37.06	4.99	32.07	86.54	99.34	13.05	86.29	86.86	3.02	0.67	2.36	77.99
	R4/721	W5/721	LKD	37.18	4.78	32.40	87.14	99.59	7.96	91.63	92.01	2.12	0.44	1.68	79.24
	R5/721	W6/721	BEDROOM	37.23	4.60	32.63	87.64	99.31	11.44	87.87	88.48	2.57	0.49	2.08	80.95
	R6/721	W1/721	BEDROOM	36.43	10.39	26.04	71.48								
		W7/721		37.13	4.36	32.77	88.26								
		W8/721		37.16	4.30	32.86	88.43	97.89	29.39	68.50	69.98	1.22	0.18	1.04	85.19
	R1/722	W1/722	LKD	37.75	7.29	30.46	80.69								
		W2/722		37.81	6.69	31.12	82.31								
		W7/722		27.40	21.42	5.98	21.82	96.77	50.98	45.79	47.32	3.47	1.12	2.35	67.65
	R3/722	W3/722	BEDROOM	37.85	6.23	31.62	83.54	99.34	17.81	81.54	82.08	3.03	0.79	2.24	73.81
	R4/722	W4/722	LKD	37.92	5.90	32.02	84.44	99.64	10.36	89.28	89.61	2.17	0.54	1.63	75.17
	R5/722	W5/722	BEDROOM	37.96	5.74	32.22	84.88	99.31	16.82	82.49	83.07	2.60	0.61	1.99	76.67
	R6/722	W6/722	BEDROOM	37.99	5.57	32.42	85.34	98.85	19.69	79.16	80.13	2.80	0.64	2.16	77.10
	R1/723	W1/723	LIVINGROOM	38.22	9.68	28.54	74.67								
		W2/723		38.24	9.95	28.29	73.98	96.27	29.69	66.57	69.11	1.76	0.34	1.43	80.88
	R2/723	W3/723	BEDROOM	38.23	9.09	29.14	76.22	97.29	16.14	81.16	83.42	1.37	0.24	1.13	82.49
	R3/723	W4/723	LIVINGROOM	38.12	8.65	29.47	77.31								
		W5/723		37.98	8.47	29.51	77.70	96.91	13.58	83.33	85.99	1.48	0.19	1.29	87.31
	R4/723	W6/723	BEDROOM	37.10	7.98	29.12	78.49	96.17	15.32	80.85	83.98	1.32	0.16	1.17	88.07
	R5/723	W7/723	BEDROOM	31.01	6.94	24.07	77.62	87.53	9.28	78.25	89.46	0.84	0.11	0.73	86.44
	R1/724	W6/724	BEDROOM	33.61	10.44	23.17	68.94								
		W7/724		28.00	9.09	18.91	67.54	87.27	15.66	71.61	82.05	1.19	0.42	0.77	64.59
	R3/724	W4/724	BEDROOM	38.35	11.41	26.94	70.25	98.93	23.90	75.03	75.84	2.13	0.72	1.41	66.09
	R4/724	W3/724	KITCHEN	38.50	11.87	26.63	69.17	98.94	25.49	73.44	74.23	2.12	0.75	1.36	64.37
	R5/724	W1/724	LIVINGROOM	35.71	10.14	25.57	71.60								
		W2/724		38.04	12.14	25.90	68.09	99.29	26.20	73.09	73.56	2.64	0.98	1.66	62.94



Proposed 2014



Proposed

25 – 27+

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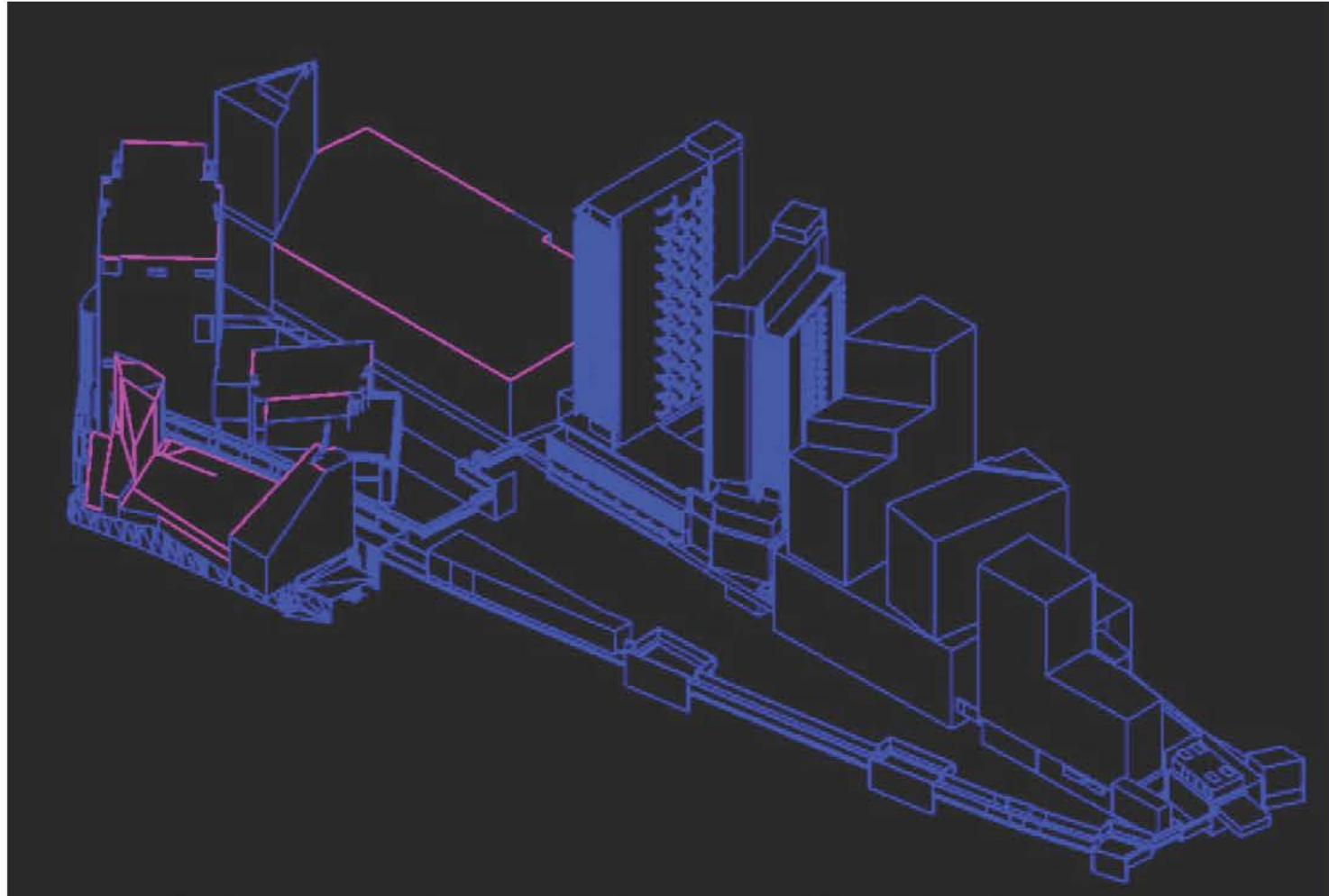
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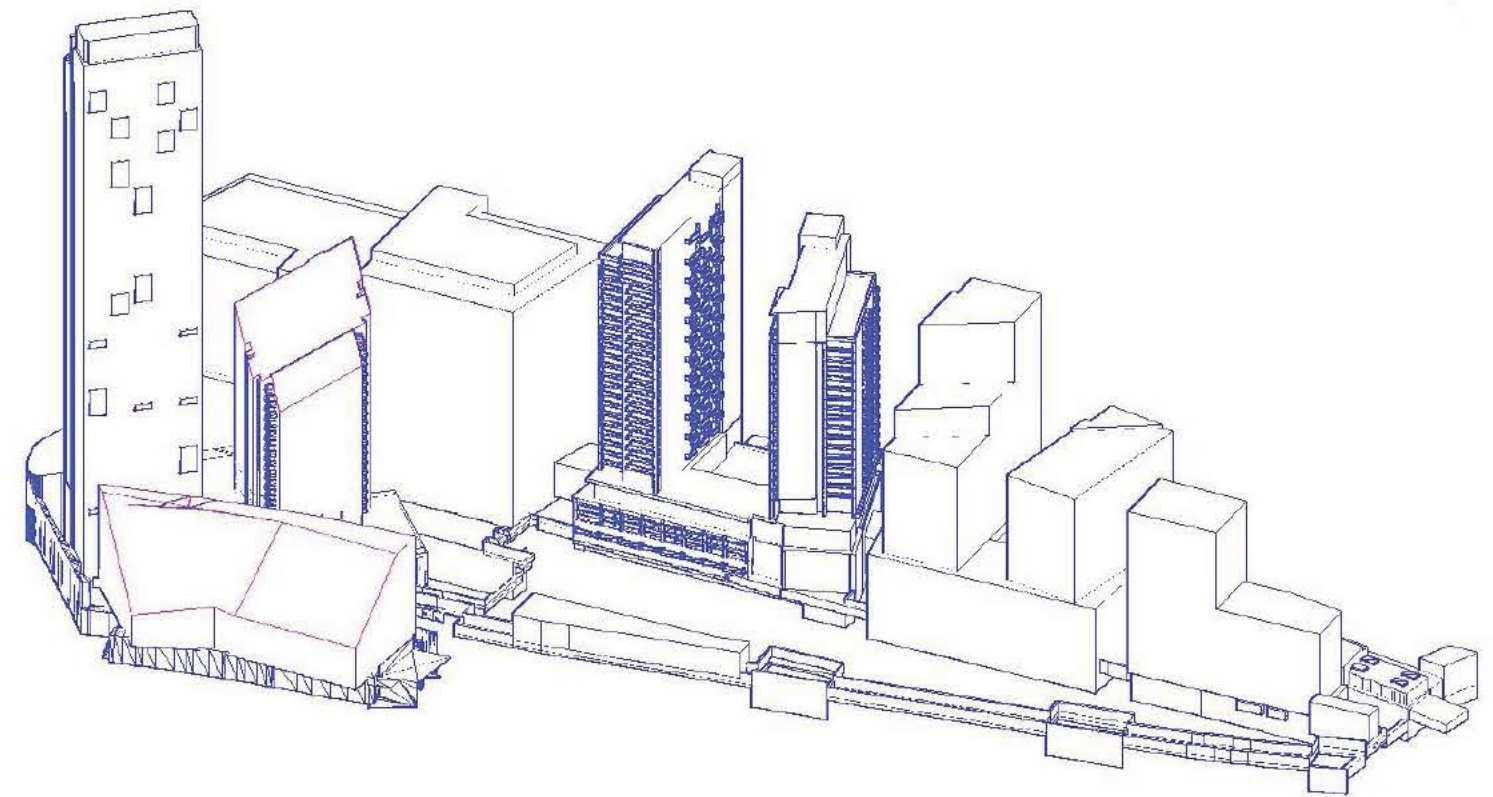
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Cutbacks

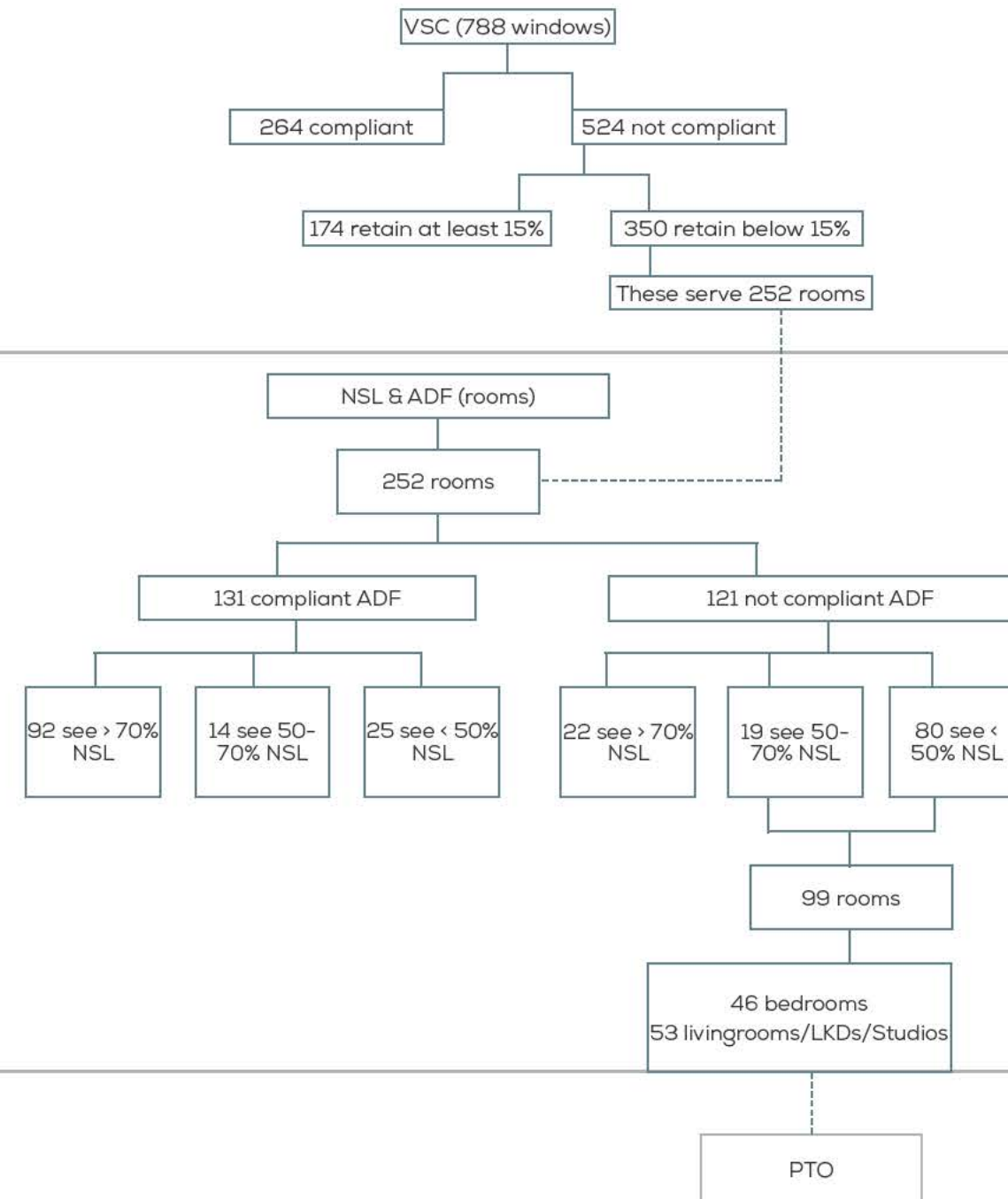
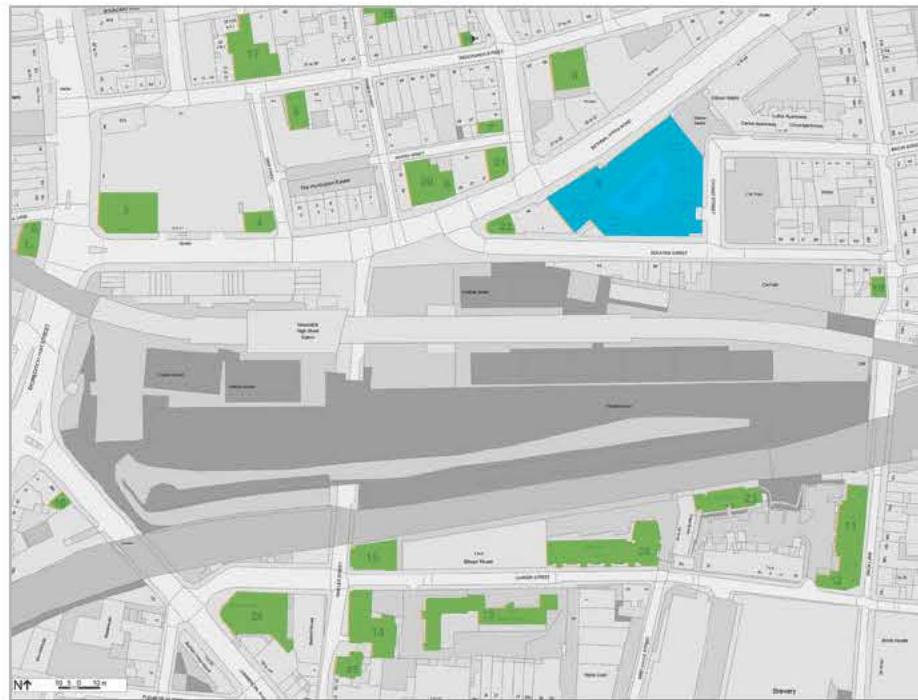


154 Commercial Street VSC Compliant (27% VSC or 20% loss)



Halfway position for 154 Commercial Street (approximately 15 % retained VSC or 3% absolute loss)

- Existing low levels of VSC and balconies restrict the view of the sky dome.



Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
Telford Homes Scheme 'Block A'	R1/5500	W1/5500	LKD	2.67	0.91	1.76	65.92								
		W2/5500		4.94	3.21	1.73	35.02	29.57	19.52	10.05	34.15	0.87	0.54	0.33	37.93
	R2/5500	W3/5500	BEDROOM	6.15	4.54	1.61	26.18	29.90	22.75	7.15	23.92	1.06	0.83	0.23	21.70
	R5/5500	W6/5500	BEDROOM	0.93	0.51	0.42	45.16	27.04	14.69	12.34	45.65	0.32	0.15	0.18	56.25
	R2/5501	W3/5501	BEDROOM	33.87	6.62	27.25	80.45	97.05	24.04	73.02	75.12	2.18	0.58	1.60	73.39
	R3/5501	W4/5501	BEDROOM	33.95	7.61	26.34	77.58	97.74	40.02	57.73	59.06	2.88	0.93	1.95	67.71
	R4/5501	W5/5501	LIVINGROOM	33.78	8.43	25.35	75.04	99.00	47.55	51.45	51.97	3.68	1.33	2.35	63.86
	R6/5501	W8/5501	BEDROOM	32.18	8.51	23.67	73.56	96.81	40.22	56.59	58.54	2.18	0.83	1.34	61.47
	R7/5501	W9/5501	BEDROOM	32.80	9.04	23.76	72.44	96.53	38.48	58.05	60.14	1.89	0.71	1.18	62.43
	R8/5501	W10/5501	LIVINGROOM	32.09	9.46	22.63	70.52	98.87	39.16	59.70	60.39	2.93	1.21	1.72	58.70
	R9/5501	W11/5501	LIVINGROOM	30.90	8.85	22.05	71.36	98.94	27.94	71.01	71.76	2.84	1.12	1.71	60.21
	R10/5501	W12/5501	BEDROOM	29.71	8.84	20.87	70.25	78.11	24.00	54.12	69.28	1.82	0.71	1.11	60.99
	R11/5501	W13/5501	BEDROOM	28.84	8.73	20.11	69.73	73.73	25.75	47.98	65.08	1.66	0.68	0.98	59.04
	R14/5501	W16/5501	BEDROOM	28.22	9.55	18.67	66.16	83.27	14.44	68.82	82.65	1.51	0.69	0.82	54.30
	R15/5501	W17/5501	BEDROOM	29.95	10.58	19.37	64.67	96.59	29.65	66.94	69.30	1.88	0.86	1.02	54.26
	R16/5501	W18/5501	LIVINGROOM	30.56	11.21	19.35	63.32								
		W19/5501		8.42	5.32	3.10	36.82	85.20	22.05	63.14	74.12	1.86	1.05	0.81	43.55
	R20/5501	W24/5501	LIVINGROOM	4.21	2.93	1.28	30.40	42.01	22.58	19.43	46.11	1.29	1.03	0.26	20.16
	R22/5501	W26/5501	BEDROOM	8.08	5.68	2.40	29.70	39.36	21.73	17.64	44.81	0.93	0.69	0.24	25.81
	R23/5501	W27/5501	LIVINGROOM	6.07	3.52	2.55	42.01	48.61	23.43	25.17	51.79	1.50	0.96	0.55	36.67
	R24/5501	W28/5501	STUDIO	11.60	6.69	4.91	42.33								
		W29/5501		11.46	6.38	5.08	44.33	61.69	28.69	33.00	53.49	0.96	0.69	0.27	28.13
	R25/5501	W30/5501	LIVINGROOM	9.52	5.19	4.33	45.48	76.59	33.17	43.41	56.69	1.38	0.92	0.46	33.33
	R26/5501	W31/5501	LKD	6.08	4.71	1.37	22.53								
		W32/5501		15.07	8.84	6.23	41.34								
		W33/5501		7.36	4.21	3.15	42.80								
		W34/5501		6.43	3.84	2.59	40.28	73.40	39.84	33.56	45.72	1.70	1.31	0.39	22.94
	R2/5502	W3/5502	BEDROOM	35.92	7.32	28.60	79.62	97.05	30.50	66.55	68.46	2.29	0.63	1.65	72.05
	R4/5502	W5/5502	LIVINGROOM	35.93	9.40	26.53	73.84	99.00	61.13	37.87	38.26	3.89	1.44	2.44	62.72
	R6/5502	W8/5502	BEDROOM	34.63	9.50	25.13	72.57	96.81	50.63	46.18	47.70	2.31	0.90	1.41	61.04
	R7/5502	W9/5502	BEDROOM	35.46	10.04	25.42	71.69	96.53	48.89	47.64	49.35	2.01	0.77	1.25	62.19
	R8/5502	W10/5502	LIVINGROOM	35.20	10.52	24.68	70.11	98.87	48.92	49.95	50.52	3.17	1.30	1.87	58.99
	R9/5502	W11/5502	LIVINGROOM	34.70	10.11	24.59	70.86	98.94	40.75	58.19	58.82	3.12	1.25	1.88	60.26
	R10/5502	W12/5502	BEDROOM	34.20	10.17	24.03	70.26	96.59	29.02	67.57	69.85	2.04	0.80	1.24	60.78
	R11/5502	W13/5502	BEDROOM	33.65	10.08	23.57	70.04	95.79	30.04	65.75	68.73	1.88	0.76	1.12	59.57
	R14/5502	W16/5502	BEDROOM	33.29	10.84	22.45	67.44	94.48	20.21	74.27	78.53	1.73	0.77	0.97	56.07
	R15/5502	W17/5502	BEDROOM	34.84	11.81	23.03	66.10	96.59	32.64	63.95	66.20	2.14	0.94	1.20	56.07
	R16/5502	W18/5502	LIVINGROOM	35.35	12.37	22.98	65.01								
		W19/5502		9.29	6.09	3.20	34.45	95.72	28.78	66.94	69.98	2.08	1.12	0.96	46.15

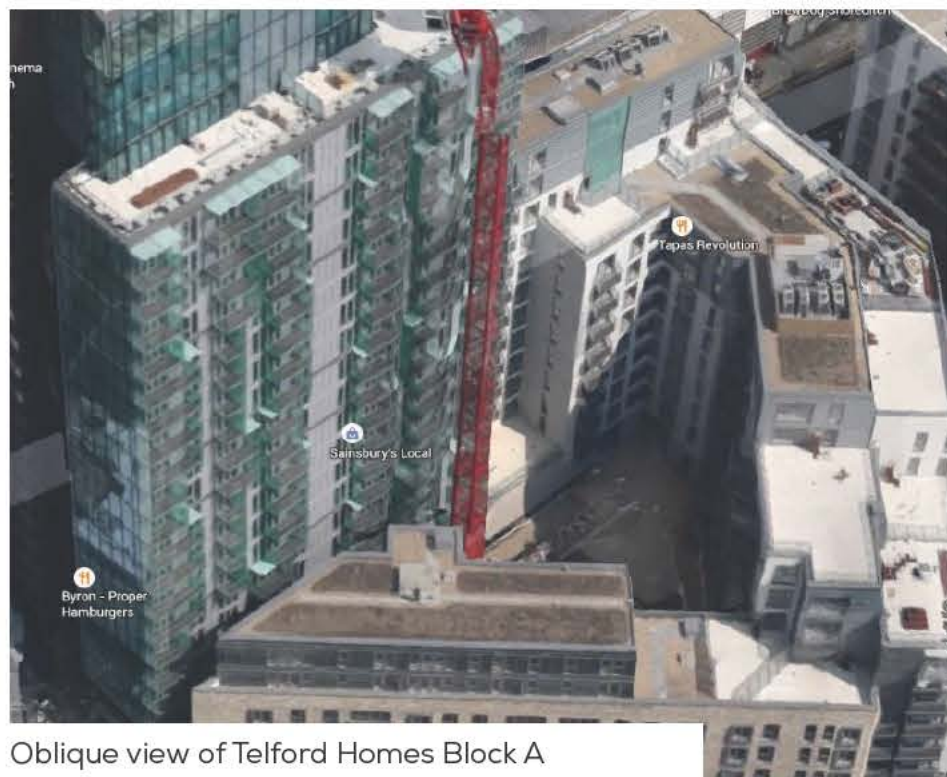
Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
Telford Homes Scheme 'Block A'	R20/5502	W24/5502	LIVINGROOM	5.26	3.21	2.05	38.97	58.63	24.85	33.78	57.51	1.47	1.08	0.38	25.85
	R22/5502	W26/5502	BEDROOM	9.64	6.46	3.18	32.99	43.73	24.16	19.57	44.59	1.12	0.81	0.31	27.68
	R23/5502	W27/5502	LIVINGROOM	7.01	3.81	3.20	45.65	62.20	25.35	36.86	59.25	1.76	1.08	0.68	38.64
	R24/5502	W28/5502	STUDIO	13.14	7.31	5.83	44.37								
		W29/5502		12.86	6.91	5.95	46.27	64.86	31.34	33.51	51.67	1.02	0.72	0.31	30.39
	R25/5502	W30/5502	LIVINGROOM	10.66	5.60	5.06	47.47	85.16	34.70	50.45	59.25	1.47	0.97	0.51	34.69
	R26/5502	W31/5502	LKD	7.44	5.77	1.67	22.45								
		W32/5502		17.49	9.87	7.62	43.57								
		W33/5502		8.53	4.62	3.91	45.84								
		W34/5502		7.42	4.18	3.24	43.67	85.90	47.06	38.85	45.22	1.88	1.43	0.45	23.94
	R28/5502	W36/5502	LIVINGROOM	4.66	1.85	2.81	60.30	82.03	29.43	52.60	64.12	0.70	0.24	0.46	65.71
	R36/5502	W48/5502	LIVINGROOM	3.91	2.06	1.85	47.31								
		W49/5502		5.40	3.06	2.34	43.33	22.87	12.81	10.07	44.01	0.64	0.47	0.17	26.56
	R37/5502	W50/5502	BEDROOM	6.79	3.30	3.49	51.40	35.70	13.36	22.34	62.59	0.83	0.51	0.33	39.76
	R38/5502	W51/5502	BEDROOM	7.30	3.32	3.98	54.52	28.36	15.54	12.83	45.22	0.43	0.27	0.16	37.21
	R40/5502	W55/5502	LKD	14.67	3.92	10.75	73.28								
		W56/5502		12.12	2.56	9.56	78.88								
		W57/5502		7.20	2.15	5.05	70.14	97.68	24.67	73.01	74.70	1.64	0.68	0.96	58.54
	R2/5503	W3/5503	BEDROOM	37.59	8.10	29.49	78.45	97.05	32.99	64.06	66.00	2.37	0.69	1.68	70.89
	R6/5503	W8/5503	BEDROOM	36.53	10.53	26.00	71.17	96.81	67.93	28.88	29.92	2.42	0.97	1.45	59.92
	R7/5503	W9/5503	BEDROOM	37.49	11.02	26.47	70.61	96.53	66.54	29.99	31.07	2.11	0.82	1.29	61.14
	R8/5503	W10/5503	LIVINGROOM	37.61	11.50	26.11	69.42	98.87	63.38	35.49	35.89	3.36	1.39	1.97	58.63
	R9/5503	W11/5503	LIVINGROOM	37.64	11.35	26.29	69.85	98.94	53.90	45.04	45.56	3.35	1.36	1.99	59.40
	R10/5503	W12/5503	BEDROOM	37.75	11.49	26.26	69.56	96.59	38.55	58.03	60.08	2.21	0.88	1.33	60.18
	R11/5503	W13/5503	BEDROOM	37.37	11.47	25.90	69.31	96.14	37.25	58.88	61.16	2.05	0.84	1.21	59.02
	R14/5503	W16/5503	BEDROOM	36.57	12.08	24.49	66.97	94.48	28.73	65.75	69.59	1.86	0.82	1.04	55.91
	R16/5503	W18/5503	LIVINGROOM	38.20	13.34	24.86	65.08								
		W19/5503		15.49	12.33	3.16	20.40	95.72	32.88	62.84	65.69	2.36	1.33	1.03	43.64
	R19/5503	W23/5503	LIVINGROOM	7.67	4.44	3.23	42.11	48.53	42.53	6.00	12.35	1.77	1.17	0.60	33.90
	R20/5503	W24/5503	LIVINGROOM	6.64	3.47	3.17	47.74	78.18	25.79	52.39	67.01	1.68	1.13	0.54	32.14
	R22/5503	W26/5503	BEDROOM	11.41	7.37	4.04	35.41	49.46	27.96	21.51	43.48	1.25	0.90	0.35	28.00
	R23/5503	W27/5503	LIVINGROOM	7.97	4.10	3.87	48.56	68.18	27.74	40.44	59.32	1.91	1.14	0.77	40.31
	R24/5503	W28/5503	STUDIO	14.78	7.95	6.83	46.21								
		W29/5503		14.31	7.45	6.86	47.94	64.80	32.51	32.29	49.82	1.09	0.75	0.34	31.19
	R25/5503	W30/5503	LIVINGROOM	11.78	6.01	5.77	48.98	86.13	35.75	50.38	58.50	1.56	1.01	0.56	35.90

Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
Telford Homes Scheme 'Block A'	R26/5503	W31/5503	LKD	9.12	7.14	1.98	21.71								
		W32/5503		20.05	10.99	9.06	45.19								
		W33/5503		9.73	5.05	4.68	48.10								
		W34/5503		8.40	4.54	3.86	45.95	87.38	56.75	30.63	35.06	2.07	1.57	0.51	24.64
	R28/5503	W36/5503	LIVINGROOM	6.27	2.62	3.65	58.21	85.19	51.10	34.09	40.01	0.89	0.42	0.46	51.69
	R36/5503	W48/5503	LIVINGROOM	6.18	3.37	2.81	45.47								
		W49/5503		8.46	4.85	3.61	42.67	37.53	20.19	17.34	46.20	0.92	0.69	0.23	25.00
	R37/5503	W50/5503	BEDROOM	10.81	5.06	5.75	53.19	68.59	19.62	48.97	71.39	1.14	0.72	0.42	36.84
	R38/5503	W51/5503	BEDROOM	12.55	5.58	6.97	55.54	66.03	24.57	41.46	62.65	0.63	0.39	0.24	38.10
	R40/5503	W55/5503	LKD	17.72	4.29	13.43	75.79								
		W56/5503		13.38	2.88	10.50	78.48								
		W57/5503		15.12	5.05	10.07	66.60	98.95	43.96	54.99	55.58	2.34	1.04	1.30	55.56
	R4/5504	W6/5504	BEDROOM	38.36	12.72	25.64	66.84	92.75	47.50	45.26	48.72	1.16	0.50	0.66	56.90
	R5/5504	W7/5504	BEDROOM	38.36	12.93	25.43	66.29	94.67	50.61	44.06	46.54	1.22	0.54	0.69	56.56
	R19/5504	W17/5504	LIVINGROOM	11.27	4.97	6.30	55.90	78.11	63.97	14.14	18.10	2.23	1.27	0.95	42.60
	R20/5504	W18/5504	LIVINGROOM	8.80	3.81	4.99	56.70	79.05	30.05	49.01	61.99	1.93	1.19	0.74	38.34
	R23/5504	W21/5504	LIVINGROOM	8.90	4.44	4.46	50.11	70.13	29.75	40.38	57.58	2.04	1.21	0.83	40.69
	R24/5504	W22/5504	STUDIO	16.42	8.70	7.72	47.02								
		W23/5504		15.70	8.08	7.62	48.54	64.80	33.11	31.69	48.90	1.15	0.78	0.37	32.17
	R25/5504	W24/5504	LIVINGROOM	12.75	6.43	6.32	49.57	86.34	36.86	49.48	57.22	1.64	1.05	0.59	35.98
	R26/5504	W25/5504	LKD	11.14	8.88	2.26	20.29								
		W26/5504		22.44	12.17	10.27	45.77								
		W27/5504		10.89	5.50	5.39	49.49								
		W28/5504		9.40	4.92	4.48	47.66	87.83	65.78	22.05	25.11	2.27	1.71	0.56	24.67
	R36/5504	W42/5504	LIVINGROOM	10.44	6.37	4.07	38.98								
		W43/5504		13.64	8.62	5.02	36.80	43.57	34.79	8.78	20.03	1.29	1.02	0.27	20.93
	R37/5504	W44/5504	BEDROOM	16.81	8.31	8.50	50.57	73.12	32.81	40.31	55.24	1.48	0.99	0.49	33.11
	R38/5504	W46/5504	BEDROOM	20.25	8.36	11.89	58.72	72.81	32.52	40.29	55.33	0.84	0.51	0.32	38.10
	R40/5504	W50/5504	LKD	19.49	4.68	14.81	75.99								
		W51/5504		14.14	3.23	10.91	77.16								
		W52/5504		21.32	6.68	14.64	68.67	98.95	61.03	37.92	38.28	2.71	1.23	1.48	54.61
	R4/5505	W6/5505	BEDROOM	38.57	13.56	25.01	64.84	92.75	48.16	44.60	48.08	1.23	0.53	0.70	56.91
	R5/5505	W7/5505	BEDROOM	38.57	13.80	24.77	64.22	94.67	51.12	43.56	46.01	1.30	0.57	0.73	56.15
	R19/5505	W17/5505	LIVINGROOM	13.21	5.33	7.88	59.65	82.35	67.08	15.27	18.54	2.47	1.35	1.13	45.75
	R20/5505	W18/5505	LIVINGROOM	10.51	4.32	6.19	58.90	79.35	31.45	47.90	60.44	2.14	1.27	0.87	40.65
	R23/5505	W21/5505	LIVINGROOM	9.73	4.78	4.95	50.87	72.01	32.52	39.50	54.76	2.16	1.29	0.87	40.28
	R24/5505	W22/5505	STUDIO	17.99	9.62	8.37	46.53								



Property	Room	Window	Room Use	VSC				NSL				ADF			
				Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss	Existing	Proposed	Loss	% Loss
Telford Homes Scheme 'Block A'	R24/5505	W23/5505	STUDIO	16.96	8.81	8.15	48.05	64.83	34.09	30.75	47.42	1.21	0.82	0.39	32.23
	R25/5505	W24/5505	LIVINGROOM	13.57	7.06	6.51	47.97	86.41	38.47	47.94	55.48	1.70	1.10	0.60	35.29
	R37/5505	W44/5505	BEDROOM	18.06	7.34	10.72	59.36	95.30	39.74	55.56	58.30	1.44	0.79	0.65	45.14
	R38/5505	W46/5505	BEDROOM	21.12	11.42	9.70	45.93	94.76	50.23	44.53	47.00	0.84	0.62	0.22	26.19
	R1/5506	W16/5506	BEDROOM	11.56	6.11	5.45	47.15	67.28	41.51	25.77	38.30	0.97	0.64	0.33	34.02
	R5/5506	W10/5506	LIVINGROOM	19.59	10.94	8.65	44.16	58.93	24.21	34.72	58.92	1.33	0.93	0.40	30.08
	R6/5506	W11/5506	BEDROOM	18.02	9.65	8.37	46.45	85.54	59.53	26.01	30.41	1.27	0.85	0.41	32.28
	R20/5506	W6/5506	LIVINGROOM	12.68	5.67	7.01	55.28	80.22	35.49	44.73	55.76	2.48	1.47	1.00	40.32
	R23/5506	W9/5506	LIVINGROOM	10.30	5.20	5.10	49.51	73.45	36.85	36.60	49.92	2.19	1.35	0.83	37.90
	R25/5506	W12/5506	LIVINGROOM	14.46	7.78	6.68	46.20	86.41	39.65	46.76	54.19	1.76	1.16	0.60	34.09
	R37/5506	W33/5506	BEDROOM	29.23	12.40	16.83	57.58	95.30	53.92	41.38	43.43	1.80	0.94	0.86	47.78
	R1/5507	W14/5507	BEDROOM	11.85	6.58	5.27	44.47	68.36	42.90	25.46	37.02	0.98	0.66	0.32	32.65
	R5/5507	W8/5507	LIVINGROOM	21.42	12.97	8.45	39.45	61.21	27.38	33.83	55.27	1.40	1.02	0.38	27.14
	R6/5507	W9/5507	BEDROOM	19.18	11.05	8.13	42.39	85.95	62.45	23.50	27.35	1.31	0.92	0.39	29.77
	R10/5507	W7/5507	BEDROOM	8.18	3.34	4.84	59.17	49.51	34.64	14.87	29.90	1.31	0.65	0.66	50.38
	R25/5507	W10/5507	LIVINGROOM	15.28	8.76	6.52	42.67	86.48	41.18	45.30	52.30	1.81	1.24	0.57	31.49
	R37/5507	W31/5507	BEDROOM	29.63	13.25	16.38	55.28	95.30	58.62	36.69	38.58	1.82	0.98	0.84	46.15
	R1/5508	W12/5508	BEDROOM	12.13	7.10	5.03	41.47	68.36	43.83	24.54	35.89	0.97	0.67	0.30	30.93

- Presence of balconies and inherent design restrict the view of the sky dome and potential daylight
- Scheme responded by creating a gap between both taller elements on Block D to enable light penetration
- The planning application was submitted in September 2007, Committee resolution to grant was in March 2008 and permission issued was in May 2008.
- The committee report and Committee Report Addendum makes it clear that when LBTH determined this application, this was done in the knowledge of discussions on BGY.
- Within the Committee Report, paragraphs 6.18 sets out English Heritage objection on the basis that the scheme could impact future redevelopment around the Braithwaite Viaduct. Additionally, in paragraph 8.45 it is recognised that there will be tall buildings in BGY and within paragraph 8.60 'Impact on the Goods Yard Site' it was advised that LBTH were working with LBH on the IPG.
- The Committee Report Addendum also makes special reference at Section 2 (p.10) 'Additional Considerations' 'Additional Information concerning the Bishopsgate Goodsyards site'
- Within the above report, paragraph 2.2.6 refers to the alterations made to the scheme to improve internal daylight levels but also ensure that development rights for Bishopsgate Goodyard Site would not be unduly compromised.
- Additionally, paragraph 2.2.7 – quotes a letter that was sent in to LBTH on behalf of BGYRL – “welcome the recent changes made by the applicants to improve the internal daylight levels within the shared ownership units in Block A on Sclater Street to recognise future development on Bishopsgate Goods Yard.”
- It is appreciated that there is also an agreement in place between Telford Homes and the JV Partnership in relation to the redevelopment of each of their sites.



Oblique view of Telford Homes Block A



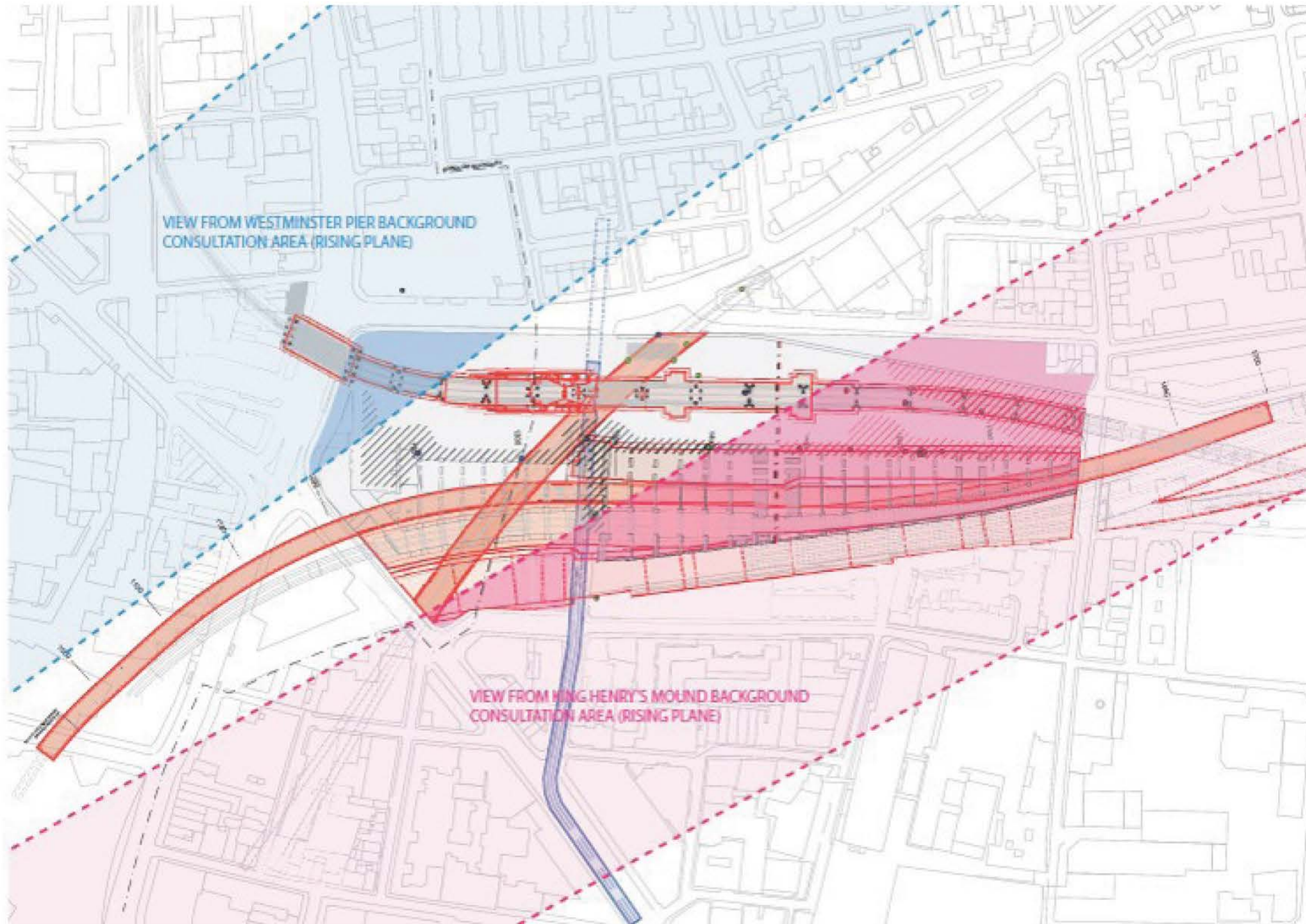
Distance from site boundary



Block D design and Telford Homes Block A

Site constraints as per IPG 2010

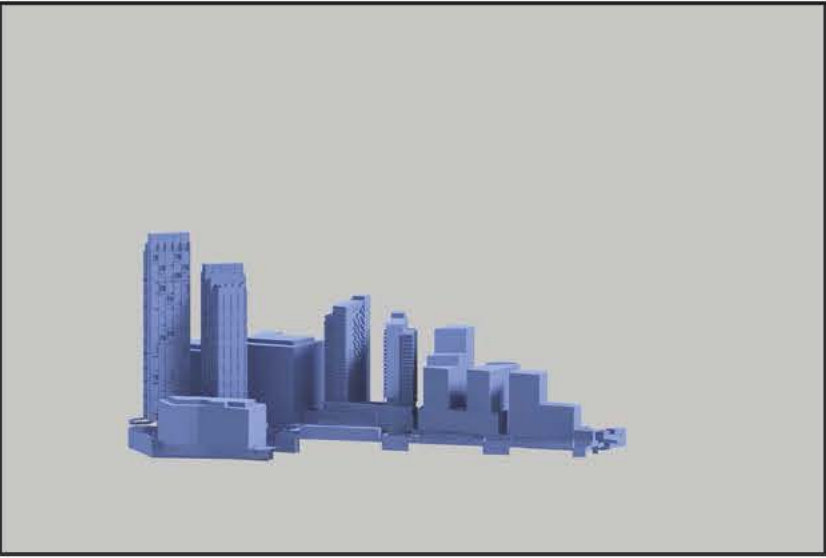
- Physical constraints include rail networks, heritage and limitation on the location of foundations
- Location of park to the south of the site above viaduct
- Taller buildings located to the west of the site with a step down in height eastwards
- Viewing corridors



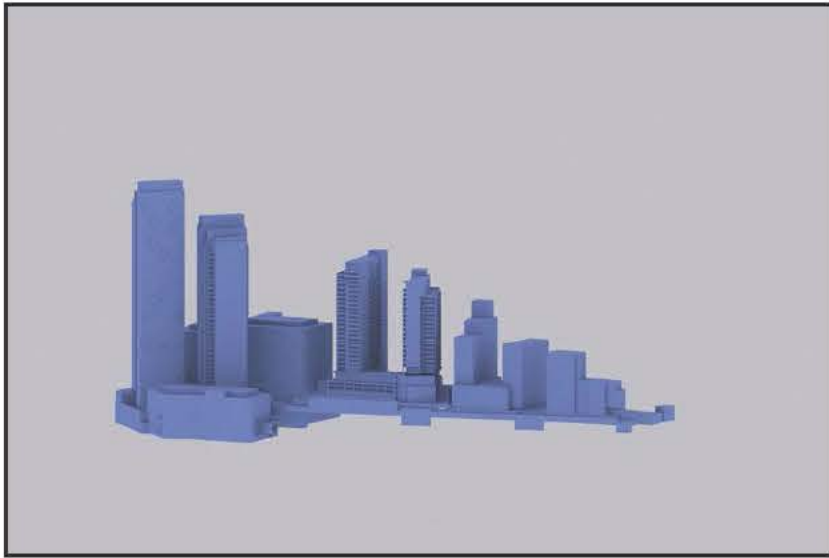
Comparison exercise to understand impacts of maximum and minimum parameters as well as adjustment to Block D on Telford Homes.

As shown below, whilst removing the tall tower of Block D would reduce the impacts to Telford Homes, the minimum parameter would improve the levels of daylight further.

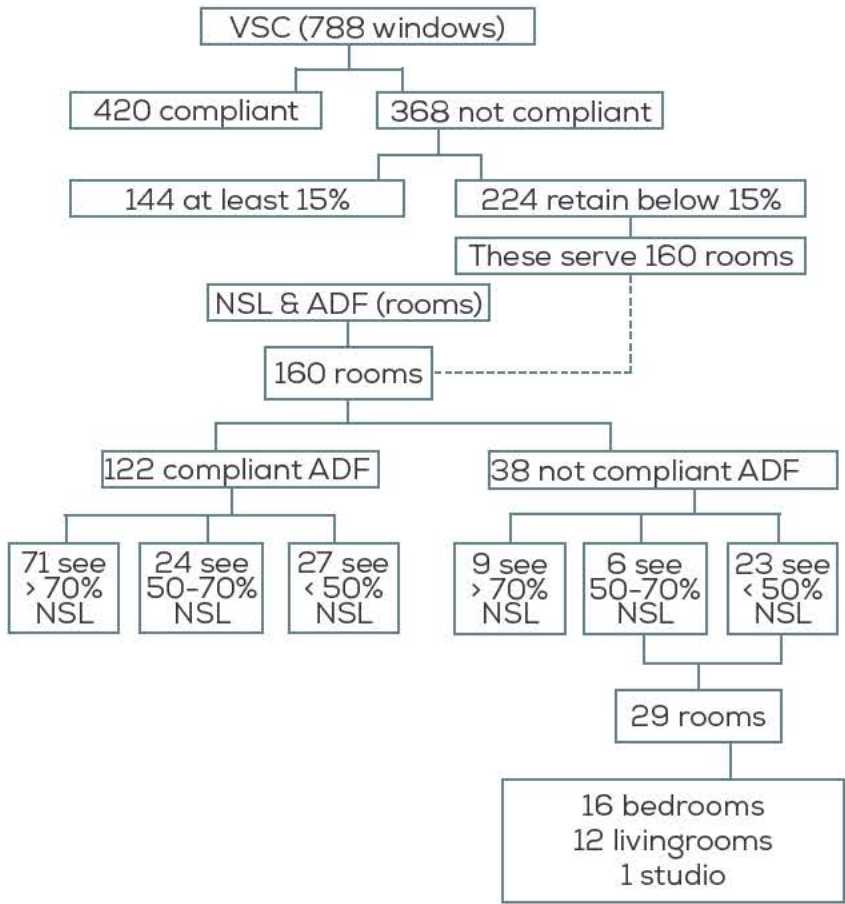
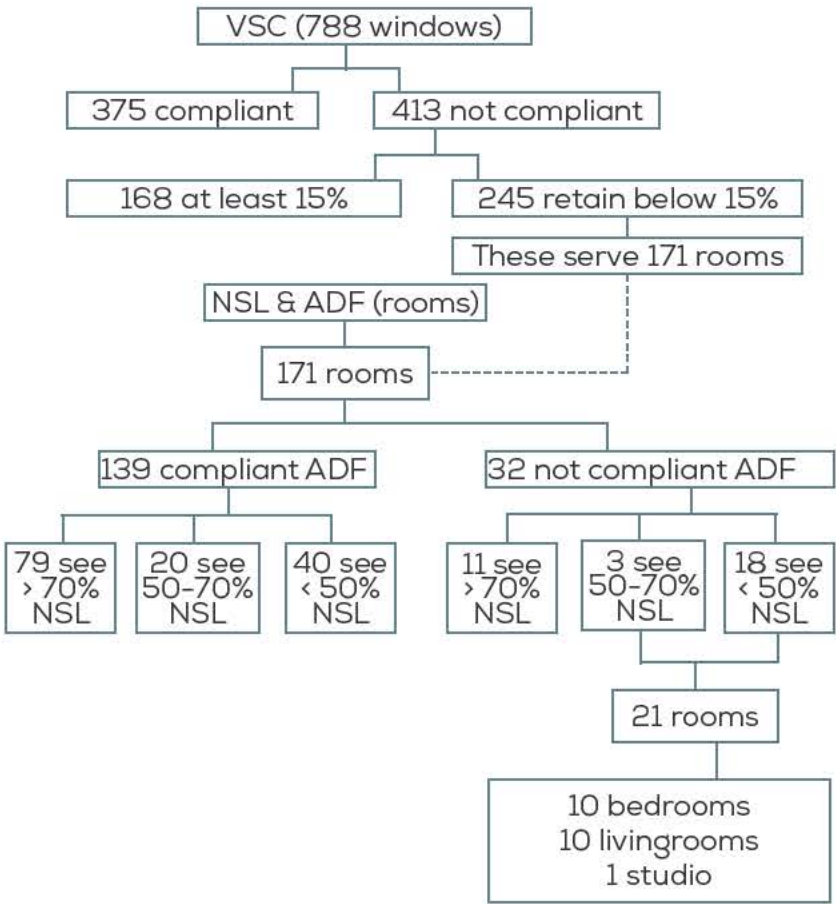
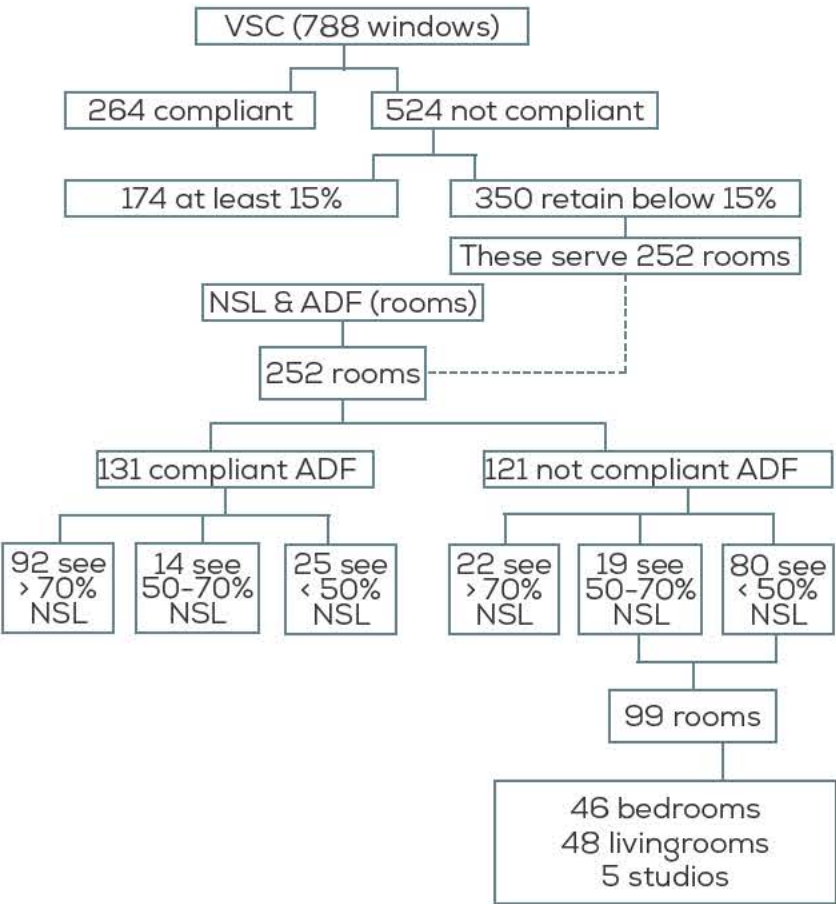
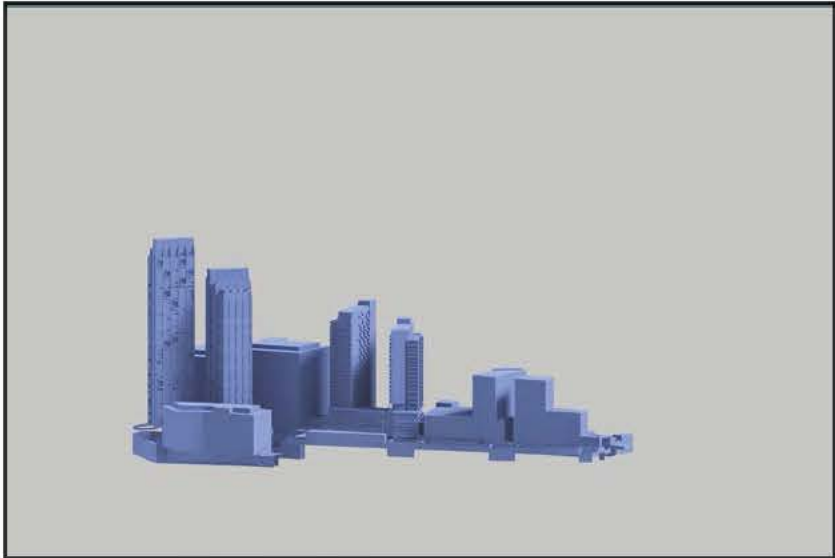
MAXIMUM PARAMETER



MINIMUM PARAMETER



REMOVE TALL TOWER BLOCK D



The Fusion – Galliard Homes Redevelopment

- PA/13/02529/A1 – ‘The erection of a building up to six storeys to provide a basement gym / ground floor commercial (use classes A1, A2, A3 and B1) and 39 dwellings’.
- Decision – Permitted 30/09/14

Daylight and Sunlight Impacts

Telford Homes ‘Avant Garde’ (1-15 Bacon Street)

- Ground floor kitchen dining room alteration 18.78% to 1.99% VSC

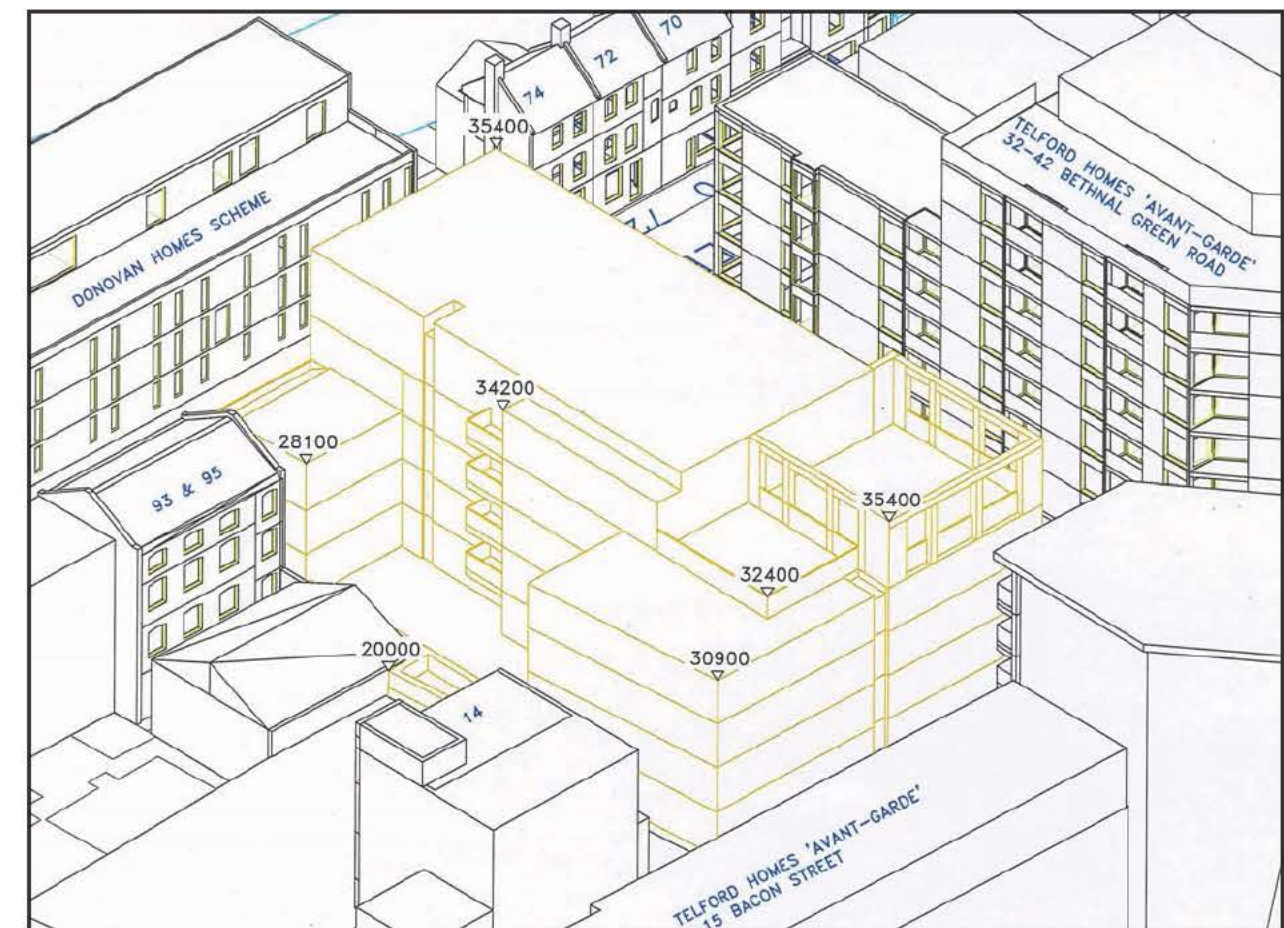
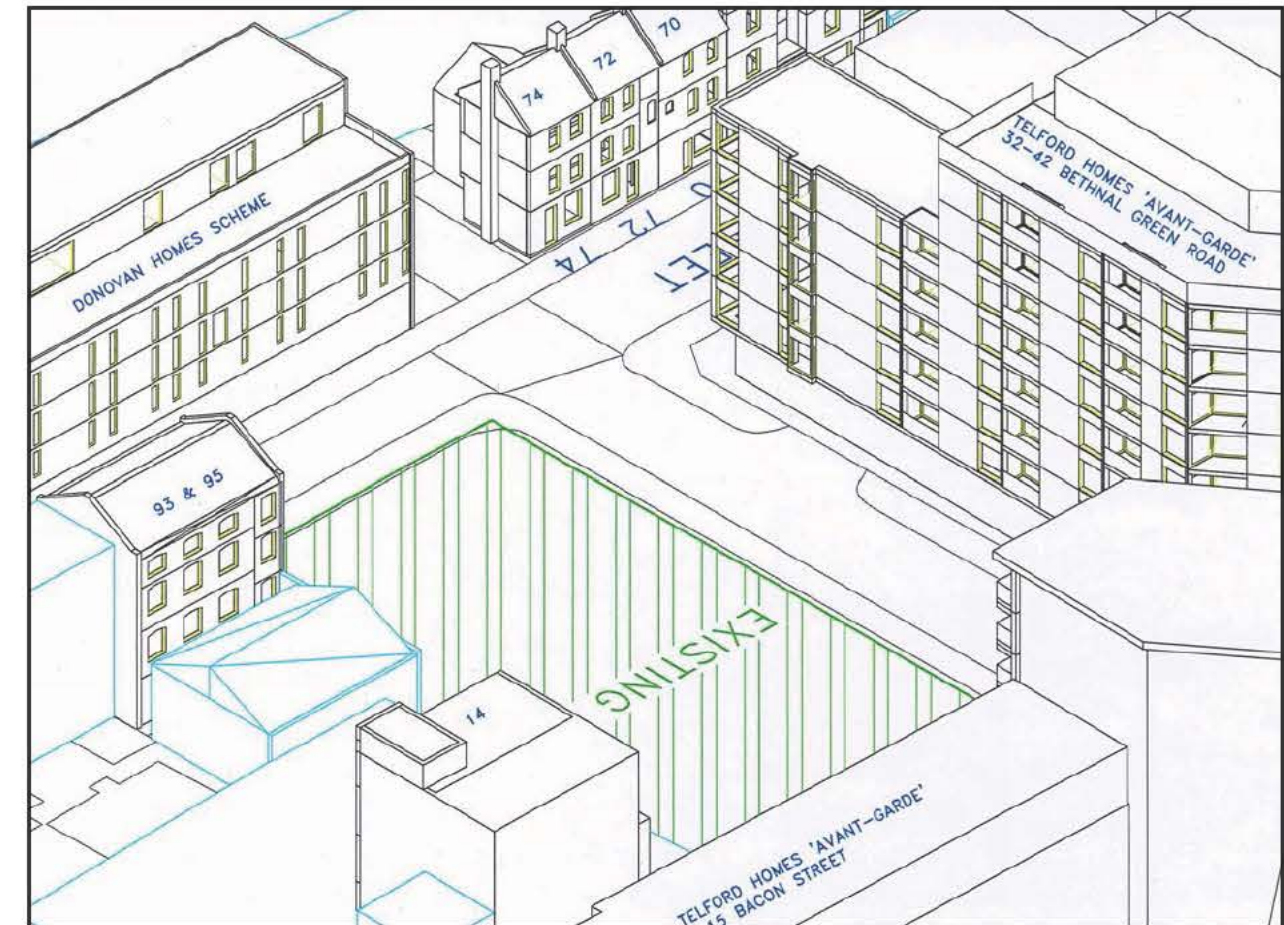
Telford Homes ‘Avant Garde’ (32-42 Bethnal Green Road)

- Bedroom R7/11 goes from 14.96% to 0.08% VSC
- 20 of the 31 apertures on the 1st floor will experience <15% retained VSC post implementation of the proposal.

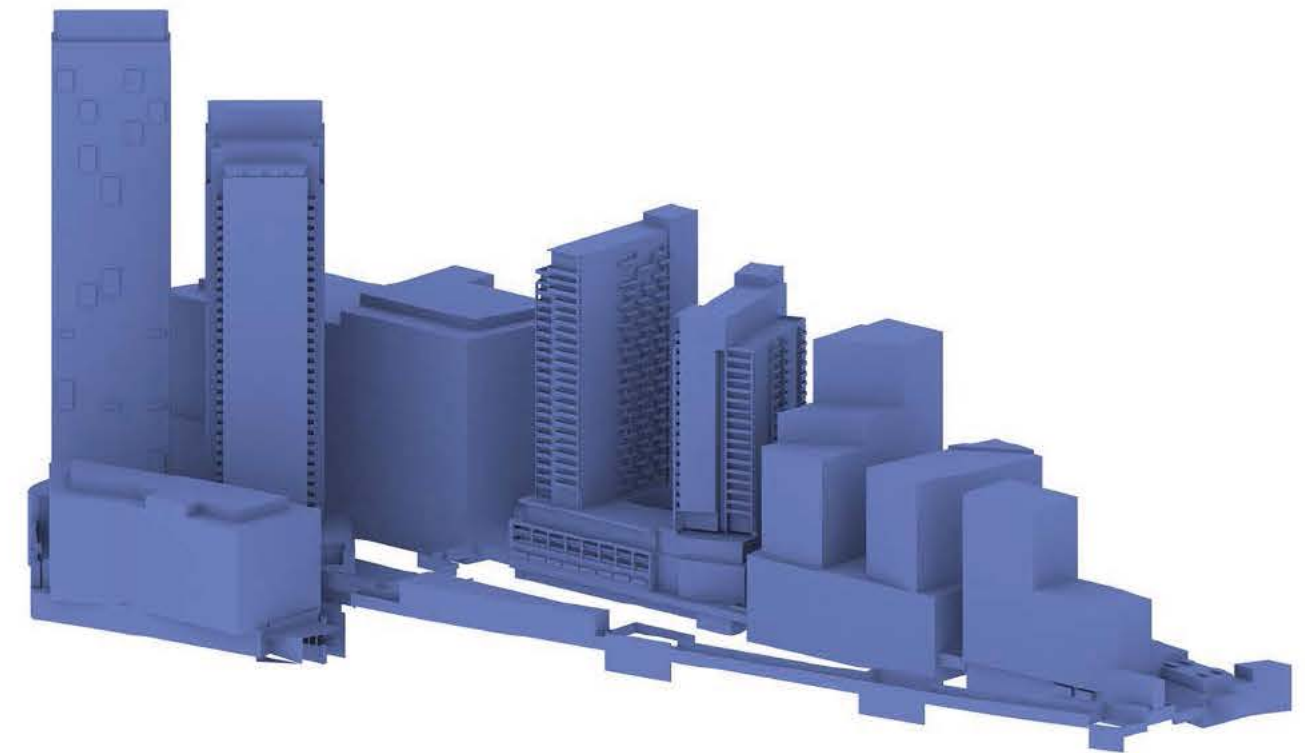
Case officer Report:

Kate Harrison; 25-06/14

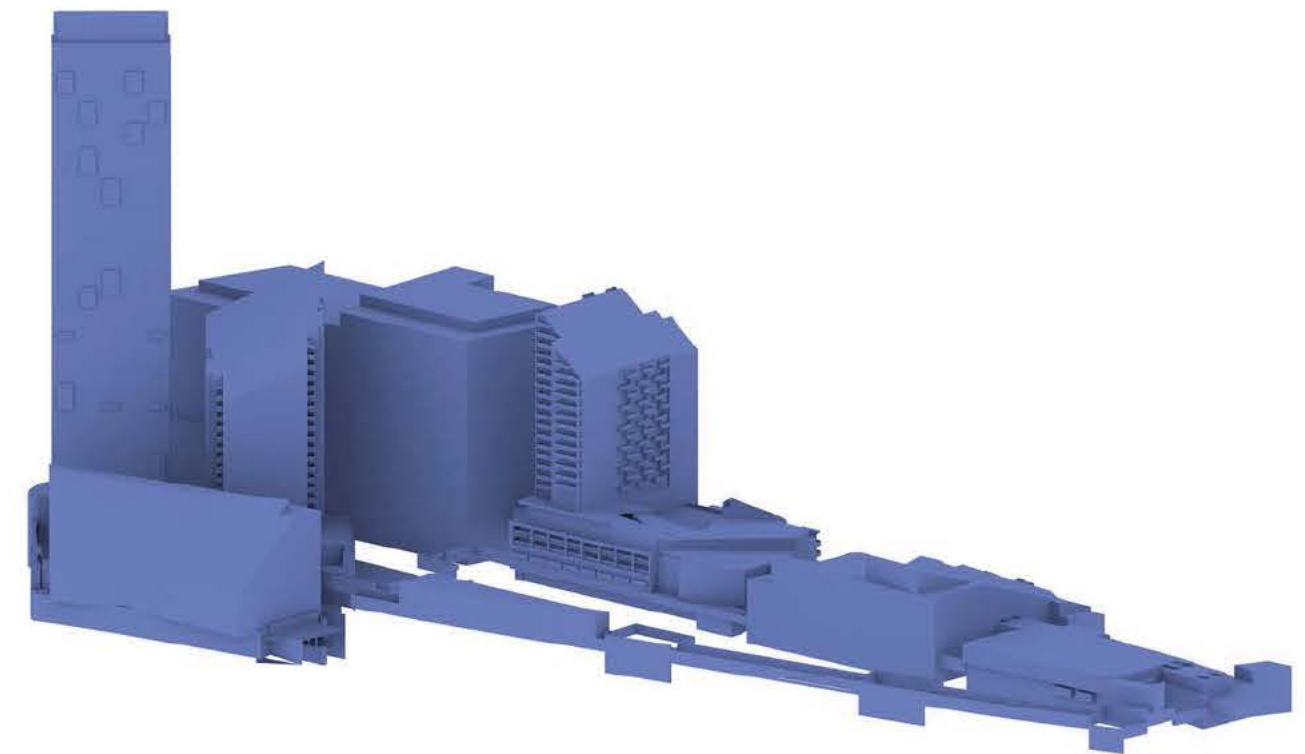
‘The worse affected rooms are at a lower floor level. In this development (Telford Homes Block A) the rooms are set back behind balconies, have a very low level of direct sky visibility and will therefore have an impression of a very closed outlook’.



- The contextual points raised on page one of this report are highly relevant to understanding the nature and degree of impact to the daylight/sunlight to neighbouring properties.
- Considering the size and extent of the proposed scheme, there are only 20 affected properties.
- The residual levels of daylight to the majority of affected properties is clearly commensurate with urban living.
- In relation to the 2 remaining properties (Hollywood Lofts & Telford Homes Block A) which have some windows where there are noticeable reductions and lower residual values, there are mitigating arguments to consider.
- The mitigating points include the fact that other adjacent consents have permitted similar levels of impacts and retained light. In fact, with Telford Homes there are actually existing values of light which are similar. In addition, there are no small modifications to the scheme which can easily address the position with these two properties.
- The perception of such a large scheme, where currently nothing exists, can distort the view in relation to daylight. The presence of any development of this magnitude is bound to create effects like this and consequently unless major modifications are made, this issue will always present itself.
- It is our clear view that when taking these points into account, whilst there will undoubtedly be noticeable reductions in light and thus harm, the overall impact is acceptable and supportable.



BGY Scheme 2015



Cutback to BGY scheme (retained 15% VSC or <3% absolute change in Telford Homes Block A and Hollywood Lofts)

Paul Robinson

From: Jim Pool <[REDACTED]@dp9.co.uk>
Sent: 29 March 2016 15:42
To: Stewart Murray
Cc: Colin Wilson; Justin Carr; Matt Christie; [REDACTED]@gvasb.co.uk'
Subject: RE: The Goodsyard - Summary Note
Attachments: Bishopsgate Goodsyard Daylight Sunlight - Updated Summary Note.pdf; The Goodsyard - Benefits Summary.pdf

Stewart & Matt

I attach for your information a summary note of the material that GIA issued to Ian Absolon (copied in). Hopefully this is of assistance.

Regards

Jim

Jim Pool
Director

direct: 020 7004 [REDACTED]
mobile: 07795 [REDACTED]
e-mail: [REDACTED]@dp9.co.uk

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Bishopsgate Goodsyard

Daylight Sunlight Summary

29th March 2016

1. Property Assessment

- GIA have provided a detailed assessment of 26 properties following the request by DPR on behalf of the 2 Local Authorities
- 6 of these properties have been shown to be of a commercial nature and therefore discounted so that the assessment focused on the remaining 20 properties.

2. Assessment Methodology

- GIA & GVA are in agreement in relation to the appropriateness of Test 1 & Test 2 and Counsel's Opinion confirms that *'It is commonplace for planning permissions to be granted where levels well below the nationally applicable benchmark are retained.'*

GIA Assessment

Test	Total Windows Tested	Compliant Windows	Remaining Windows
Test 1 (VSC pass)	1607	512	1095
Test 2 (VSC >15%)	1095	424	671

- Tests 3 and 4 consider the ADF and NSL methods of assessment. Test 3 considered two factors – whether a room meets the ADF target values and whether it also retains a daylight distribution to at least 70% of its room area. Test 4 considers where a room does not meet the ADF and NSL criteria, does the room experience more than a 20% alteration in ADF.
- GIA have combined both aspects (target criteria and 20% loss) of the ADF in one pass fail test. Therefore where GIA state ADF pass this considers both whether it meets the target criteria for ADF and if not met whether the room experiences a 20% reduction in ADF.
- The use of ADF retained levels in regards to Telford Homes is recognised by the BRE and supported by the Counsel Opinion obtained 18th March 2016.
- In addition, it is widely accepted within the industry that the VSC and NSL should be considered alongside each other when reporting impacts on existing surrounding properties and that the ADF may be used as a supplementary measure. Such an approach was used on City Pride when determining the impacts.
- GIA have therefore considered those rooms which fail all tests – VSC, NSL and ADF – as the focus of their reporting and requiring further consideration.
- GIA have shown that only 185 rooms fail to comply with the VSC, NSL and ADF tests (4 tests) and some of these have additional considerations that should be taken into account:
 - Of 185 rooms that fail the 4 tests, only 77 are Living-rooms (88 Bedroom; 20 Other)
 - A number of properties have existing balconies that restrict the view of the sky dome and potential for daylight e.g. 25 Wheler Street, 1-48 Wheler House, 70 Redchurch Street.
- The 671 windows that fail the VSC (test 1 & 2), serve 455 rooms.

Test	Total Rooms Tested	Compliant Rooms	Remaining Rooms
Test 3 & 4	455	270	185

- Excluding the Telford Homes scheme, there are only 86 of the 185 remaining rooms in the other 19 properties, of which only 24 are living rooms.

3. Telford Homes

- The Telford Homes scheme represents 99 of the 185 remaining rooms.
- Of these 99 rooms, only 53 are living rooms/LKDs/Studios, 46 are bedrooms which are considered less sensitive in daylight terms as recognised within the DPR report.
- Committee resolution to grant (March 2008) makes a number of references to the future development of tall buildings on The Goodsyrd site, including confirmation that changes were made to the Telford Homes scheme to ensure that the development of The Goodsyrd would not be unduly compromised.
- There is an agreement between BGRL and Telford Homes which is a relevant consideration.
- Within Telford Homes, many of the windows have existing levels of VSC below 15% (prior to the implementation of the proposed development). This is likely due to the inherent architectural design of the building with overhanging balconies and residential units facing a small courtyard.
- Whilst Block D has responded to Telford Homes splaying both towers to allow light through to the courtyard units, GIA have looked at the impact on Telford Homes of further alternative massing solutions for Plot D:

Scheme	Total Windows Tested	Total Rooms Failing GIA Assessment	No. Living Rooms	Loss of New Homes – The Goodsyrd
Max Parameters	788	99	53	0
Min Parameters (Plot D)	788	49	29	50
Remove Tallest Tower (D1)	788	29	13	118

- The Minimum Parameter (Plot D) Scheme reduced the number of impacted living rooms by almost 50%, whilst limiting the loss of new Homes delivered on The Goodsyrd.
- The removal of the D1 tower has been undertaken purely from a daylight assessment perspective. The substantial impact on the viability as a result of losing 118 of the 313 units within Plot D has not been considered, nor has the feasibility of bridging over the East London Line to deliver only 95 units within the smaller tower (D2)
- By adopting the Minimum Parameters (Plot D) Scheme, 49 rooms within Telford Homes will be affected, of which only 29 will be living rooms.

The Goodsyard - Benefits for London

The transformation of a derelict 10 acre brownfield site within the City Fringe that has been empty for 50 years:

1) Homes for London

- 1356 new homes
- 25% Affordable Housing, including 141 homes on-site and a £22m payment provision for 88 homes within Hackney.
- Early delivery of 115 Affordable Homes within the first phase

2) Jobs for London

- 7000+ new jobs (800,000+ sq.ft of new office space; and 200,000 sq.ft retail space)
- Affordable workspace (80,000+ sq.ft)
- 150 Apprenticeships at London Living Wage
- Commitments to local labour during construction
- Further education and employment contributions in addition to a jobs charter

3) Restoring Heritage and creating a new Place

- Both Listed and non-listed heritage assets restored and opened up to the public
- High quality urban masterplan and building design appropriate for Central London
- 2.4 acres elevated public park
- 2.5 acres of new public realm, streets, squares and lanes that will reconnect the site with the surrounding area
- Ideas Store for Tower Hamlets in the First Phase
- GP Surgery

4) Contributing to London's Community

- £14m Mayoral CiL & Crossrail
- £16m Borough CIL to LBH
- £6.5m TFL Contribution
- The completed scheme would represent an additional £540m GVA per annum to the London economy
- The new residents will contribute approximately £27m per annum to the local community.

Paul Robinson

From: Julian Shirley <[REDACTED]@dp9.co.uk>
Sent: 24 March 2016 15:48
To: Matt Christie
Cc: 'Jonathon Weston'; 'COUGHLAN, Tony'; 'Kevin Murphy'
Subject: RE: The Goodsyrd - Heritage issues

Matt

I refer to your email below and to our subsequent discussion. As you know, for the reasons previously set out both in the planning application and the recent response prepared by KM Heritage, our strong view is that the wall is not listed.

However, even if the wall is listed (which we strongly dispute) it does not automatically mean that consent cannot and should not be granted. It should be remembered that taking into account the GLA's statutory duties under s72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have regard to the desirability of preserving the building or its setting, recent case law and government policy in the NPPF, it is of course still possible to grant planning permission and listed building consent for a development which involves the demolition of a listed structure.

Factors that we consider are particularly relevant here are:

- The demolition would be of only part of the listed structure and would be a peripheral element (if indeed this part is considered to be listed).
- It is accepted that the focus of the listing is the forecourt wall and the gates, not the B2 boundary wall.
- Demolition of the wall and replacement by the new development would enhance the setting of the forecourt wall and gates and be an improvement on the current position.
- The B2 boundary wall if retained, would need to be demolished in any event and rebuilt given its current condition.

Further, taking into account the requirement of para 133 of the NPPF, we would argue that it is necessary to demolish B2 to achieve the recognised substantial public benefits to be brought about by the regeneration of this significant and strategic central London site.

Regards

Julian Shirley

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From: Matt Christie [mailto:[REDACTED]@london.gov.uk]
Sent: 23 March 2016 11:05

To: Julian Shirley <[REDACTED]dp9.co.uk>
Cc: 'Jonathon Weston' <[REDACTED]ballymoregroup.com>; 'COUGHLAN, Tony' <[REDACTED]hammerson.com>;
'Kevin Murphy' <[REDACTED]kmheritage.com>
Subject: RE: The Goodsyard - Heritage issues

Julian,

Further to the email below. We have now discussed the outstanding heritage points and, whilst the majority of Kevin's response is helpful and addresses most of the points raised, the issue of the listing extent is giving me serious concern. Whilst acknowledging that you may have been proceeding on the basis of your interpretation, having not been advised otherwise by the local authorities, confirmation of the listed building extent should have been sought from English Heritage/ Historic England early in the project using the enhanced listing service ([Listing Enhancement | Historic England](#)). If this was done then could you please point me to the letter/ email they sent you or provide me with a copy.

Many thanks

Matt

From: Matt Christie
Sent: 22 March 2016 11:50
To: 'Julian Shirley'
Cc: 'Jonathon Weston'; 'COUGHLAN, Tony'; 'Kevin Murphy'
Subject: RE: The Goodsyard - Heritage issues

Julian,

As mentioned below, I am going through Heritage with Edmund this afternoon. Have you had a chance to respond to HEs point on listing yet?

Matt

From: Matt Christie
Sent: 16 March 2016 15:28
To: 'Julian Shirley'
Cc: Jonathon Weston; COUGHLAN, Tony; 'Kevin Murphy'
Subject: The Goodsyard - Heritage issues

Julian,

Thanks again for the heritage response- I've had a chance to go through this now and I'll be meeting with Edmund next Tuesday to go through the points in detail. In relation to B2 I've managed to obtain a copy of the English Heritage email Hackney mention- see below. Going forward I think KMH must respond to this and address the issues raised. In particular the following statement needs a response:

The ramp R4 is also within the footprint of the area bounded by the fabric mentioned within the listing description, so should form part of the scope of the listing. Furthermore, I would consider that because there is no clear break in the brick wall as it runs to the south along Commercial Street as far as Wheeler Street, this wall also forms part of the listed asset.

Could you please have a look at this and get back to me once you are able to response.

Thanks

Matt Christie | Senior Strategic Planner and Urban Designer | Development & Projects

Greater London Authority | City Hall, The Queen's Walk, More London Riverside, London SE1 2AA

Tel: 020 7983 [REDACTED] Email: [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: Brady, Claire [[mailto:\[REDACTED\]@english-heritage.org.uk](mailto:[REDACTED]@english-heritage.org.uk)]

Sent: 18 February 2015 15:13

To: Matt Payne

Subject: RE: Bishopsgate Goods Yard - Extent of Listing

Dear Matt,

Thank you for your enquiry. I've looked into this matter and my views are as follows:

The listing description (dated 1975) relates specifically to the 'forecourt wall and gates to the old Bishopsgate Good Yard'. There is a little more clarity in the descriptive text, which refers to the elliptical oriel bay, the wide entrance below, a red brick wall on the east side [of the asset] and the gate itself and gate pier [to the west]. This gives a fairly tight area. Because the oriel and supporting structure to the oriel and immediate vaults to the east (G1 to G9) appear to be contemporary with the fabric that is mentioned in the listing description, I would say that they form part of the listed asset. The ramp R4 is also within the footprint of the area bounded by the fabric mentioned within the listing description, so should form part of the scope of the listing. Furthermore, I would consider that because there is no clear break in the brick wall as it runs to the south along Commercial Street as far as Wheeler Street, this wall also forms part of the listed asset.

In terms of defining curtilage structures, it would appear that there was a past legal challenge relating to Bishopsgate Goodsyards at the time of the LUL proposals in 2002. I would refer you to the following article, particularly paragraphs 31 to 38:

<http://www.richardbuxton.co.uk/transcripts/hammerton-v-london-underground-limited>

This seems to confirm that my above assessment of what is the principal listed asset is correct and that none of the other structures on site can be considered to be curtilage listed structures, including V1 to V11 and R1, R and R5.

For any further enquiries, please don't hesitate to contact me.

Many thanks,

Claire Brady | Inspector of Historic Buildings and Areas

Direct Line: 020 [REDACTED]

Mobile: [REDACTED]

English Heritage | 1 Waterhouse Square
138-142 Holborn | London | EC1N 2ST

www.english-heritage.org.uk

Please note that I work part time and am not in the office on Fridays

Paul Robinson

From: Julian Shirley <[REDACTED]@dp9.co.uk>
Sent: 18 March 2016 16:48
To: Matt Christie
Cc: Jonathon Weston; COUGHLAN, Tony; Jim Pool; Gordon Ingram; Stephen Friel
Subject: Goods Yard
Attachments: 5464987v1-BGY - RHQC Opinion - Daylight - March 2016-LWDLIB03.docx; The Goodsyard - Summary Table - GVA and GIA comparison on Test 1 and Tes....pdf; 2971-jl-16-0318(Coughlan).pdf

Matt

Further to our conversation yesterday and in advance of the meeting on Monday, please see attached the following:

Counsel's Opinion

The attached Opinion sets out the relevance of using retained ADF results within the context of the development of an inner London site, with reference to Telford Homes. Counsel's view is that in such circumstances the use of ADF results are relevant and should be a material consideration.

Secondly, in respect of the deed between the JV and Telford Homes, Counsel considers that the deed is also a relevant consideration (for the reasons set out) and should carry weight with the decision maker.

GIA Review of GVA Report dated 14th March 2016

GIA have reviewed GVA's report and provide further clarification on the number of windows assessed as meeting the BRE VSC criteria (first test set by GVA) and of the remaining which have a VSC greater than 15%. A summary table is also attached.

We look forward to discussing this further with you on Monday. From our side, attendees will be myself and Jim Pool, Tony Coughlan and Peter Cole; Jon Weston and Peter Halpenny; Gordon Ingram and Stephen Friel.

Regards

Julian Shirley

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BISHOPSGATE GOODS YARD.

DAYLIGHT ISSUES.

OPINION.

1. I am asked to advise briefly as to the relevance of of two considerations in the determination of acceptability of impact on a property known as the Telford Homes building.
2. The first consideration is the relevance of the levels of Average Daylight Factor (ADF) retained in the residential development post development.
3. The second is the relevance of a deed between the developers of the Telford Homes building and the joint venture partners in the development of the Bishopsgate Goods Yard.
4. I shall deal with each consideration in turn.

ADF as a material Consideration.

5. The impact of a proposal on the daylight reaching an existing building is well understood to be a material consideration in the determination of an application for planning permission.
6. This is reflected in the fact that there are generic policies contained in the London Plan protecting residential amenity from “unacceptable harm” (see in particular Policy 7.6Bd of the London Plan). Note, the policy does not require there to be no harm and the determination of what is acceptable will depend in significant part on the benefits associated with a proposal.
7. The new Mayoral Housing SPG (March 2016) makes it clear that in the context of the housing crisis and the need to provide significantly more housing in the capital, there is a requirement to examine retained levels of daylight with flexibility. This flexibility is particularly necessary in opportunity areas, town centres, large sites and accessible locations.
8. The Housing SPG states in terms that “the degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve **satisfactory levels of residential amenity and avoid unacceptable harm.**”
9. Guidance on daylighting in a residential context is given in the BRE document entitled “Site layout planning for daylight and sunlight: a guide to good practice, BRE, 2011”. That document is not part of the statutory development plan. On its own face it says that its application is not mandatory and the guideline values it sets are to

be applied flexibly to the circumstances of the case. It is a document which applies to the whole of the UK and Ireland with no differential made between rural or urban environments.

10. The starting point for a consideration of impact of new development on existing residents' premises is usually to test the retained Vertical Sky Component (VSC) against an identified benchmark. VSC is the proportion of sky that is visible beyond adjacent obstruction from a central point in any window.
11. The benchmark which is suggested for the UK and Ireland is 27 degrees VSC. This benchmark would reflect the high retained level of vertical sky visible arising from a typical low to mid rise built development across a suburban scale street.
12. Securing this general level of visibility of the sky as a requirement is simply impossible and undesirable in an inner urban area where there is a need to optimise housing and overall delivery. Furthermore, the use of such a benchmark would result in buildings of inappropriate scale and mass for their surroundings in such areas.
13. It follows that in such areas and particularly in London, other alternative benchmarks and flexibilities around those benchmarks have to be considered. It is commonplace for planning permissions to be granted where levels well below the nationally applicable benchmark are retained.
14. The question for the decision-maker is whether satisfactory levels of daylight are achieved having regard to context and other levels achieved in that context and whether any harm is unacceptable when weighed against the benefits of a proposal.
15. In such circumstances, the more information the decision-maker has about the retained levels of light within the effected buildings the better. Such information certainly cannot be said to be inadmissible or immaterial.
16. ADF is a measure of overall daylight in a space. More technically it can be described as the average illuminance on the working plane in a room, divided by the illuminance on an unobstructed horizontal surface outdoors. The CIE standard overcast sky is used, and the ratio is usually expressed as a percentage.
17. ADF is used in a number of daylighting contexts.
18. For example, BS 8206-2 gives minimum values of ADF for a variety of room uses. This standard is designed to ensure that **new** development meets minimum standards for type of room.
19. The BRE Guidance recognises the use of ADF as an appropriate method to measure daylight in a room. It does state however, in the context of a nationwide guidance document that use of the ADF for loss of light to existing buildings is **not generally** recommended.
20. The BRE guidance then goes on to give examples of when nationally the use of ADF to test loss of light to existing buildings **is** recommended. It includes as one example where buildings are built in succession as part of a planned sequence.

21. That list of examples where ADF is recommended cannot be a closed list identifying the only times when use of ADRs as a material consideration might be relevant.
22. In inner London opportunity areas where the general prospect of achieving the national benchmark is neither appropriate or desirable and where a degree of loss of amenity is acceptable even on the face of the policy, the use of a lower VSC and the relationship of the retained ADF to levels which are national minima for new rooms are both clearly at least relevant considerations for the purposes of the overall determination of whether a satisfactory level of daylight in context is retained.
23. I can see no logic by which ADF results can in these circumstances be said not to be relevant. The weight to be given to such a relationship will be a matter of judgment.
24. But, where the building being impacted is itself a new tall building which has only recently been completed and where there would always have been an expectation in the occupiers of that building of taller new neighbours as a result of the ordinary operation of the planning system, one would expect the relationship of the retained ADRs to the minimum national levels for new buildings in the BS to be of particular relevance.
25. And of course in inner London, in Opportunity areas and elsewhere, decision-makers do habitually (and correctly) have regard to retained ADFs in existing buildings as part of the suite of information relevant to determination. It is not unusual or inappropriate to see retained ADF levels in existing reported in Mayoral Part I and II reports, reports to planning committee at borough level and in inspectorate reports.

The relevance of the Deed

26. By a deed dated 22nd December 2010 the owners of the Telford Homes site permitted interference with rights of light which might occur as a result of the development of the Bishopsgate Goods Yard. Such permission was granted to the Bishopsgate Goods Yard Regeneration Company.
27. Ordinarily, the consequences of such private agreements have limited weight in the determination of applications such as this.
28. But in the circumstances of this case, the deed and the factors surrounding it should carry weight with the decision-maker.
29. I say so for the following reasons:
 - a. The deed was advanced and accepted (at least in part) as the Telford Homes answer to the contention that the development because of its height and location would harm the ability to optimise development on the Goodsyard site. (see supplementary Report to LBTH Planning Committee).
 - b. The deed has been offered by an independent commercial developer who did not have any concerns that significant development on the BGY site would unacceptably harm amenity in the building.

- c. That proposition has been reinforced by the absence of any objection from the owner of the building. Indeed, there is evidence of positive support reflecting a recognition of the overall enhancement in amenity in the round that will be brought about by the redevelopment.

RUSSELL HARRIS QC
LANDMARK CHAMBERS.
March 2016

GIA Analysis for GLA

17th March 2016 - Clarification of Discrepancies

 indicates a different result

		GIA		GIA		GIA		GVA		DIFFERENCE		GIA		GIA		GIA			
Property	Address	Property Info		Test 1		Test 2		Initial Comparison					Property info for Remaining		Test 3		Test 4		
		Windows	Rooms	VSC Compliant	Remaining	>15% VSC (GIA rounded to 0 decimal places)	Remaining	Windows	VSC Compliant or >15%	Remaining	Windows Tested	Failed Test 1 & 2	Windows	Rooms	ADF Compliant	Remaining	>70% NSL	Remaining	
1	13 Bethnal Green Road	Commercial Property		-	-	-	-	-	-	-	-	-	-	-	-	-	-		
2	15 Bethnal Green Road	Commercial Property		-	-	-	-	-	-	-	-	-	-	-	-	-	-		
3	78 Quaker Street	Commercial Property		-	-	-	-	14	8	6	14	6	-	-	-	-	-		
4	65-66 Bethnal Green Road	Commercial Property		-	-	-	-	-	-	-	-	-	-	-	-	-	-		
5	25 Bethnal Green Road	Commercial Property		-	-	-	-	-	-	-	-	-	-	-	-	-	-		
6	167 Commercial Street	Commercial Property		-	-	-	-	13	-	13	13	13	-	-	-	-	-		
7	63 Redchurch Street	4	4	4	PASS	-	-	-	-	-	-	4	-	-	-	-	-		
8	196 Shoreditch High Street	20	11	19	1	1	PASS	10	6	4	10	4	-	-	-	-	-		
9	194-195 Shoreditch High Street	12	6	-	12	12	PASS	10	5	5	-	2	5	-	-	-	-		
10	30 Redchurch Street	2	2	-	2	2	PASS	2	2	-	-	-	-	-	-	-	-		
11	10 Quaker Street	23	19	-	23	16	7	29	12	17	6	10	7	6	-	6	4	2	
12	23-24 Wheler Street	19	7	14	5	3	2	18	10	8	-	1	6	2	2	-	-		
13	1-48 Wheler House	241	114	30	211	44	167	241	59	182	-	-	15	167	78	11	67	45	22
14	14 Chance Street	4	4	-	4	-	4	4	-	4	-	-	-	4	4	2	2	2	PASS
15	97-105 Brick Lane	46	36	28	18	13	5	51	49	2	5	-	3	5	5	2	3	3	PASS
16	25 Wheler Street	87	63	36	51	30	21	87	66	21	-	-	21	19	9	10	2	8	
17	19-29 Redchurch Street	23	15	3	20	9	11	23	12	11	-	-	11	10	-	10	2	8	
18	17 Bethnal Green Road	5	5	-	5	-	5	5	-	5	-	-	5	5	1	4	2	2	
19	70 Redchurch Street	21	15	3	18	2	16	21	3	18	-	2	16	14	2	12	-	12	
20	119 Brick Lane	12	9	-	12	8	4	12	6	6	-	2	4	3	-	3	-	3	
21	1-42 Eagle House	191	94	72	119	97	22	191	167	24	-	2	22	19	4	15	10	5	
22	28-30 Bethnal Green Road	30	9	12	18	-	18	42	19	23	12	5	18	9	3	6	5	1	
23	3 Club Row	12	10	7	5	-	5	12	2	10	-	-	5	5	3	2	-	2	
24	1-16 Sheba Place	8	8	4	4	3	1	8	-	-	-	1	1	1	-	1	1	1	
25	154 Commercial Street	59	35	16	43	10	33	63	23	40	4	7	33	23	3	20	-	20	
26	Telford Homes	788	413	264	524	174	350	788	385	403	-	53	350	252	131	121	22	99	
TOTALS		1607	879	512	1095	424	671	1644	834	802	57	131	671	455	173	282	97	185	
If you exclude Telford Homes		819	466	248	571	250	321	856	449	399	57	78	321	203	42	161	75	86	



By Email

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18/03/2016

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Dear Tony,

Re: Bishopsgate Goodsyrd – Daylight / Sunlight Clarification

GIA have been instructed to review the report dated 14 March 2016 by GVA on the daylight and sunlight to the key properties, and to provide further clarification on the numerical discrepancies. This letter therefore seeks to provide further clarification as to the differences in the number of windows assessed as meeting the BRE VSC criteria (first test set by GVA) and of the remaining those which have a VSC greater than 15%.

From comparison of both company approaches, there are two reasons behind the numerical discrepancies:

1. Numerical rounding of the VSC values to remove decimal places means that all those windows which have a VSC of 14.5% or more will be rounded up. Within the BRE the VSC is discussed as a whole number (without decimal places) however, due to technical capabilities two decimal points can be achieved in the assessment. Following this approach the GIA assessment rounds all VSC values 14.5% have been rounded up to 15% as is a standard mathematical rule.
2. Consideration of commercial properties and floors within the key receptors. GVA include several properties known to be commercial and have included windows known to serve commercial space for examples:
 - a. 78 Quaker Street – commercial throughout
 - b. 167 Commercial Street – converted to commercial
 - c. 28-30 Bethnal Green Road – ground floor commercial
3. In addition, all relevant windows within 194-195 Shoreditch High Street, 196 Shoreditch and 30 Redchurch Street, removing ground floors which are commercial, retain over 15% VSC and therefore meet the second VSC test.

I trust this assists in clarifying the discrepancies between the two sets of data and confirms the position in regards to GIA tests 1 and 2 for the VSC.

Kind regards,

Yours sincerely
For and on behalf of GIA

Joanna Lyons
EIA Manager
██████████@gia.uk.com

Paul Robinson

From: Matt Christie
Sent: 15 March 2016 11:35
To: 'Julian Shirley'
Cc: Colin Wilson; Justin Carr
Subject: BGY- GVA Daylight/ Sunlight response
Attachments: M Christie re Bishopsgate Goodsynd 140316.pdf

Julian,

Please find attached the GVA report summarising their assessment of the GIA report of 8 March 2016. Obviously GIA will need some time to have a look at this and reflect on what they wish to raise at next Monday's meeting. I am keen, however, to have an agenda emailed out by this Friday in order to ensure that the meeting is as useful as possible and all of the non-daylight/ sunlight experts in the room can follow what is going on. To that end, I think it best to structure the agenda as per the attached report, assuming that GIA will be coming to put their view across on the points raised by GVA. I will give you a call Thursday/ Friday to go through and agree this but please let me know soonest if GIA intend to introduce any new information/ arguments that we haven't already seen. This will allow the necessary preparation to be made in advance and make it possible to fully consider any new points for inclusion in the planning report.

Many thanks

Matt Christie
Development & Projects
GLA
020 7983 [REDACTED]

Our ref: IA01

14 March 2016

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Dear Sirs,

Re: Bishopsgate Goodsyard Redevelopment – Daylight and Sunlight – GLA Review

I have been instructed by the GLA to undertake a review of the Daylight and Sunlight impacts that will be caused should the current proposals, called in for review by the GLA, proceed.

The standard process of analysis of impact has been undertaken between the developer and the Local authorities in control of the site. As is normal in such cases for a large scheme of redevelopment the local authority has taken advice on this subject from an external specialist consultant.

That consultant, Delva Patman Redler (DPR), has been provided with the full technical analysis of the consultant to the developer, Gordon Ingram Associates (GIA). They have then reported to the local authority giving their professional view as to the level of the various impacts around the site.

The DPR report highlighted a number of properties that, in their view, would be impacted to a greater degree than is normally acceptable.

In response GIA produced a report on these individual properties titled Bishopsgate Goodsyard, Daylight and Sunlight ref 2971 dated 14/12/2015.

It is that report and any back up analysis that the GLA have asked me to advise them on.

Standard BRE Principles

The analysis of Daylight and Sunlight Impact is usually carried out by using the methodology in the Building Research Establishment Document "Site Layout Planning for Sunlight and Daylight, A guide to good Practice."

This is very much the industry standard methodology although many Councils have now removed reference to this from their development plans. There is however no other accredited method of checking the impact on neighbouring buildings to a development.



In this case GIA have rightly used the BRE guide to test the Daylight and Sunlight to surrounding buildings.

In its basic form the BRE guide uses a relatively simple method to assess impact. The existing level of Daylight or Sunlight is assessed at the relevant window and expressed in percentage terms of wither available sky visibility for Daylight or available sun hours for sunlight.

The Daylight also carries with it a test for the depth of penetration within any room of visible sky. The test of available sky at the window is called "Vertical Sky Component (VSC)" and the penetration within the room The No-Sky Line (NSL).

If in any circumstance the proposals would reduce either of the above percentages by more than 20% of the existing values then the BRE guide tells us that this would be a "noticeable" change.

If therefore a development needs to show that there is no impact on amenity, which is in effect what most Local Authorities seek, then there should be no loss beyond this 20% level.

The BRE guide recognises that in certain locations, inner cities etc, that this is not always possible and that potentially one might be able to set one's own guide levels. It appreciates the need for flexibility as if in every single case the loss of daylight was restricted to less than 20% then this would cause a restriction on development that may be disproportionate to the actual loss of light. For example one kitchen window may prevent hundreds of flats being constructed.

Many local authorities, in my experience, do allow flexibility and quite rightly set the loss of amenity into the planning balance with all the benefits, to the public, of the scheme.

In such circumstances Consultants in the field have to show that despite the losses that are in excess of the 20% guide the level of retained light is still sufficient for use and habitation. It is a matter of some debate as to what level of daylight is actually acceptable and indeed expected. The level of expectation will undoubtedly change with location, a City Centre use expecting a far lower level of Daylight than a Suburban or rural setting.

GIA Analysis

Given the backdrop of the above and that the original analysis showed many transgressions of the 20% test, GIA have sought to set their own level of acceptability for the local area to the Goodsyrd.

To the North of the site is the extensive residential Boundary Estate and GIA have analysed this to see what levels of Daylight are currently received in this urban environment.

These calculated out to be between 17% VSC and 25 % VSC from ground to Second floor levels. In addition they use an example of a central London location where consent has been granted and where retained levels of Daylight are at 11%.

They use these to suggest that a VSC value of 15%-18% might be the expectation for habitation in an area such as Shoreditch on the City fringe.

I have no objection to this type of analysis and it has become a method often used to check the level of impact or acceptability of large schemes which may unavoidably create daylighting issues.

On that basis I would accept that a target value for neighbouring residential use in such a location and with the desired level of redevelopment might be between 15% VSC and 18% VSC.

I have therefore looked at the levels of compliance with this criteria across those properties highlighted by DPR as being significantly impacted.

GVASB Analysis

GIA have set out in their document an analysis of the individual properties questioned by DPR and explained the level of impacts and a reasoning as to why the levels of impact should be seen as acceptable.

I have taken these and also checked the actual levels of daylight to see what the residual levels of daylight are like compared to the GIA assessed local level. In doing so, I have recorded the number of windows per property that will be below the 15% level. I have discounted those windows that by dint of their existing design currently receive a low level of VSC, these will record a high percentage reduction whatever the scale of development proposed and clearly could not be said to enjoy any usable level of amenity in the existing condition.

119 Brick Lane

This building has 12 windows, from these 6 will have less than 15% VSC ranging from 9% up to 14%.

97-105 Brick Lane

51 windows are within this building which is located at the far East end of the site and not directly opposite the development.

There are two windows that see a large reduction and will be below 15% VSC retaining at 6% and 5% respectively.

78 Quaker Street

Of 14 windows 6 will be reduced to less than 15% , the values ranging from 11%VSC to 14% VSC.

3 Club Row

With 12 windows located in this building there will be 10 that will be left at less than 15%, although some windows are already below 15% the reductions are significant with retained levels between 2.6% and 11%.

1-48 Wheeler House West

This is an extensive balcony access block South of the scheme and at 90 degrees to it.

It has 51 tested windows and out of these 40 will have light left at less than 15%. The retained levels are from 3% VSC up to 11%VSC.

Some 8 of the 40 actually see a small reduction however that leaves 32 windows that see a significant reduction and will be left at less than 15% VSC.

1-48 Wheeler House (Main Block)

This is the main block attached to the above building and thus parallel to the scheme.

It has 190 windows tested. Out of these 142 will be left with less than 15% VSC but it would be fair to comment that many of the values are already low and the retained level of light will not be significantly different from that existing . However there are 71 windows that move from a reasonable level of light to single figures, the retained levels here will range from 3% VSC-13% VSC.

25 Wheeler Street

This building is located some distance to the South with 87 tested windows, of these 21 will retain less than 15% VSC . It is argued by GIA that the distance from the site means that despite the reductions in light , which in some cases are significant , and the low levels of the retained light there will not be disproportionate impact . I cannot agree with that statement, it is true some of the existing values are low but in some instances the level of light is reduced to zero or near zero, that cannot be acceptable as an impact.

10 Quaker Street

Again, south of the scheme a property with 29 windows 17 of which will fall below 15%VSC. 9 of these move from well over 30% VSC to under 15% and indeed 2 of them from 29% to 5% VSC.

167 Commercial Street

This is a small building over a ground floor commercial unit to the west of the site.
All 13 windows fall from over 30% VSC to less than 15%.

195 Shoreditch High Street

Located diagonally North West of the site on the main road junction this building again has units over ground floor commercial.

This building sees 4 of its 10 windows fall from high levels of daylight to less than 15%.

194 Shoreditch High Street

Located diagonally North West of the site on the main road junction this building again has units over ground floor commercial. This building sees 5 of its 10 windows fall from high levels of daylight to less than 15%.

Tea Building 65-66 Bethnal Green Road

This is a non-residential use, these are not usually incorporated into Daylight analysis unless the local authority specifically requests. I have assumed the GLA would not wish to consider this building an issue although clearly there will be impacts on light.

13 Bethnal Green Road

This is a non-residential use, these are not usually incorporated into Daylight analysis unless the local authority specifically requests. I have assumed the GLA would not wish to consider this building an issue although clearly there will be impacts on light.

This is a small property whose rear elevation is located to the north and separated by an intermediate block of property. The two windows here will retain in excess of 15% VSC and under the suggested criteria be acceptable.

32 Redchurch Street

This is a small property whose rear elevation is located to the north and separated by an intermediate block of property. The two windows here will retain in excess of 17% VSC and under the suggested criteria be acceptable.

17 Bethnal Green Road

This is another small property to the North of the site but it is directly opposite the North Elevation.

Its 5 windows all see a reduction to less than 15% VSC from levels over 30% VSC.

70 Redchurch Street

Again to the North and separated by other property blocks this has 21 windows 18 of which will be left at less than 15 % VSC. 9 of these reduce significantly and are left with levels of VSC between 8% and 14 % VSC.

Telford Homes Block A

This is a large recent redevelopment to the North side of the scheme plot.

It has a large number of units within it and consequently 788 windows were analysed, out of these 403 will see retained levels at less than 15 % VSC. In this case there are many Living/Dining rooms that see this impact where levels are being taken down from 23% to around 13%.

In this block GIA have also, as allowed in the BRE guidance , run a set of assessments that ignore the balcony projections to the flats that often cause a greater than normal reduction in light . If in such circumstances the results then achieve compliance it can be stated that it is the inherent design of the balcony that is causing the issue.

In this case the GIA testing shows that half the windows would still be reduced to below 15% VSC and thus the level of impact must be due to the scheme's mass.

63 Redchurch Street

Located three property blocks to the north of the site this building does not currently appear to be in residential, use.

1-16 Sheba Place

Although located directly to the South of the scheme the windows facing the site are kitchens and not thought to be other than food preparation rooms. On that basis we would normally find the impacts acceptable.

1-40 Eagle House

This block is also south of and parallel to the site and contains 191 windows that face the site.

From these 24 will retain less than 15% VSC with the majority around 13 % VSC.

23-24 Wheeler Street

Separated by one property block to the south of the site 8 of the 18 windows are reduced to less than 15% VSC. It could be argued that the impacts here are acceptable as only two windows see a greater than 20% reduction. Based on the 15% criteria however there is a reasonably high impact.

154 Commercial Street

This building is immediately to the South of the scheme at its western end. Only 16 achieve a compliance in reduction terms and when assessing against the 15 % VSC criteria 40 of the 63 windows do not retain that level. It is argued that many are bedrooms, our additions show 20 that are in fact lounge areas.

19-29 Redchurch Street

Located almost 100m to the north of the site the building has 23 windows of which 11 will be left with less than 15%VSC. In the case of this building there are reductions from 10% and 8% to 0.84%VSC to 0.56% VSC for example.

15 Bethnal Green Road

Given the layouts of the floors for this building there is no issue.

25 Bethnal Green Road

This building does not appear to be in residential, use.

28-30 Bethnal Green Road

Located on the prominent corner between Bethnal Green Road and Sclater Street the building sits immediately to the North of the scheme. Its 42 windows see large reductions and 23 are left at less than 15% VSC. Many existing levels are high but these reduce to 6-10% VSC.

14 Chance Street

This property has only 4 windows facing the site and the design is such that the windows are set deep within recessed balconies. Existing light levels are so low I do not feel they constitute usable amenity, any reduction will not change the ability to use these rooms.

Sunlight

The actual sunlight availability figure are not referred to in the document and the whole subject is concluded in one paragraph. Justification for what will be significant impacts on neighbour's sunlight are based on there being a significantly high abnormal availability across the site in the existing condition and that therefore large reductions will be inevitable. Also that winter sun, being so low, will be lost in any reasonably big development of the site.

Overshadowing

This analysis applies to any neighbouring open amenity space that has the expectation of sunlight. Only two are analysed in this document, Shoreditch House swimming Pool and the internal Courtyard to Telford Homes development.

In terms of the pool the test is failed in that at least 50 % of the area should get 2 hrs sun on March 21st. The mitigation offered is that the pool will be well sunlit in summer, this is true but it will be a colder less inviting place outside the summer months.

In terms of Telford Home's space there is little sunlight in the existing condition, it was clearly not an overriding issue at design stage and any reductions will make no meaningful difference to its use.

Initial Summary

On the basis of the criteria suggested by GIA out of the 1643 windows that were the subject of the DPR concern 808 fail to retain the 15% level.

Subsequent to reporting this to the GLA I met with GIA who went through each property where a major impact had been noted to explain to me their reasoning as to why the impacts may be acceptable.

It was clear from this meeting that a number of properties had been included in the analysis that had been found to be commercial in use and therefore should not be part of the analysis.

I advised GIA that it would be beneficial to produce a further document which rectified this and summarised their reasoning on the acceptability of the impacts for each property.

This was supplied and I undertook a review of that document which was in letter format dated 18th February and titled "Bishopsgate Goodyard – Daylighting Impacts Summary Note".

The note sought to justify the impacts on the various affected buildings, however, it was considered that the explanation for the impacts as a whole were not consistent and sought to use differing justifications in each circumstance.

Following a meeting with the GLA I advised the GLA request a report on each property which considered each building under a set of specific parameters such that it would be possible to reach a conclusion on the total number of rooms impacted around the scheme that did not meet any of those criteria and hence give a means to quantify the total number of neighbours truly impacted.

The revised analysis was provided and titled "Flow Chart Report – 8/3/2016.

The parameters I asked for were:-

1. Building by building list the number of habitable rooms tested and how many of these see a more than 20% reduction in VSC
2. Building by building then list the total number of rooms that will remain above 15% VSC
3. Building by building where rooms are left below 15% how many would pass the ADF test and be left with a daylight distribution contour of over 70% of room area.
4. If there are ADF levels already below standard then how many rooms fall into that category and how many see a more than 20% reduction.

The reasoning for the above is that, as explained earlier in the report, the headline test for impact is to check the percentage reduction in available sky. If this is more than 20% of existing there will be a noticeable change for the occupant.

Having accepted the Urban nature of the site and that there will inevitably be higher reductions in light the second test asks do the impacted rooms retain 15% VSC which can be agreed as a reasonable level of daylight for this locality?

The third test relates to the Average Daylight Factor (ADF). This is a test set up by British Standards and seeks to test the average light throughout a room and this gives minimum criteria for habitation. The test uses the room surface areas, the glazed area and internal and external reflectivity to achieve the analysis. In conjunction with this the Standard asks that as well as passing the minimum ADF that a sufficient proportion of the room should be directly lit from the sky, the No- sky line (NSL) test.

Both these tests should be passed to have satisfactory living conditions.

The final analysis suggested looks at percentage reductions in ADF, there is no prescribed test as such, however, it has been argued that if a percentage reduction is allowable within the VSC criteria then the same should apply to the ADF criteria. In my view this is not a sound analysis, the ADF is an absolute test and not a comparative one. However there are circumstances where the ADF is, in the existing condition, below the minimum criteria and it can be useful to look at the change. GIA however have not used that fourth test.

I have analysed the "Flow Chart" report and concluded, on the basis of the criteria that the following impacts would fall below all the criteria.

1. 63 Redchurch St - 2 fail and have very low levels of light.
2. 196 Shoreditch High Street – all retain above 15%.
3. 194-195 Shoreditch High Street - All pass.
4. 30 Redchurch Street - Assumed top floor only is residential, if correct all pass.
5. 10 Quaker Street - 6 rooms fail.
6. 23-24 Wheler Street – 3 fail with very low ADF levels.
7. 1-48 Wheler House - 67 rooms fail. (No precise information on actual Habitable room numbers.)
8. 14 Chance Street – 2 fail (note here these are hugely recessed windows and existing light levels are very low , impact not noticeable).
9. 97- 105 Brick Lane – 10-15 rooms impacted (no precise room use information , therefore not possible to be precise about ADF failure).
10. 25 Wheler Street – 12 rooms fail, residual impacts very high.
11. 19 -29 Redchurch Street – 8 rooms impacted, these have very high percentage loss.
12. 17 Bethnal Green Road – 4 out of its 5 rooms are impacted.
13. 70 Redchurch Street – 12 rooms fail.
14. 119 Brick Lane – 3 rooms are failing here, the impacts are extremely high.
15. 1-42 Eagle House – 16 rooms are impacted.
16. 28 – 30 Bethnal Green Road – 6 rooms impacted.
17. 3 Club Row – 4 rooms.
18. 1-16 Sheba Place – 1 room only, this is a massive impact.
19. 154 Commercial Road - 22 rooms, very sever with losses up to 88% of existing levels.
20. Telford Homes – 213 of 413 rooms fail.

There are 20 properties listed here as GIA have said that the other 6 properties listed in the scheduled on page 8 of the document are commercial. I have not had the opportunity to check that point, it would require a further site inspection.

In summery then of 914 rooms tested I find 412 do not achieve a 15% residual VSC level and cannot be justified as being well lit in terms of the ADF criteria.

Mitigation

GIA seek to justify these impacts in a number of ways, I have listed below and my views on them.

1. Existing tight building configuration. – This undoubtedly leads to difficult scenarios when developing sites as some buildings have limited views to the sky and the closing of small gaps in the view can lead to high impacts.

I don't believe this is a reason to simply leave an existing neighbour badly lit, the circumstances are what they are and one has to cope with that in design. In some circumstances if development is a planning requirement on a specific site then impact may be unavoidable.

2. The site is current open - again this is normally a good justification as it will be inevitable that high impacts will be felt as the baseline level of daylight is extremely high . This has in my view been dealt with by reducing to a certain point the target for VSC and indeed by allowing ADF /NSL criteria to become a target too.
3. Fusion Scheme example – GIA have sent a copy of the Daylight studies for this scheme adjacent to the rear of the Telford Site. Impacts have been allowed that would not have passed the criteria that we have been using for BGY and GIA seek to show that is a reason why a number of neighbours can be allowed to fall below those criteria. It is a reasonable point to bring up, however, my view would be the weight of numbers in each case is very different. Effectively the Fusion Scheme, being low rise on an old car park site, actually impacted few neighbours and it would have been unlikely to have been possible to develop that site at all if more stringent criteria were imposed. That is not the case on the BGY site. Different design would alter the number of impacts accepting that this will lead to a reduction in unit numbers on the BGY site.
4. Telford Homes- It is true to say that a large number of the seriously impacted rooms are located in the Telford Homes Scheme on Bethnal Green Road. Evidence was sent to show that a pre-existing agreement had been reached between the developer and those of the Goodsyrd as such that there would be no objection in light terms. The document is clearly a common law light agreement and has no impact on planning .It would not be possible, in my understanding, for a freeholder to contract out any leaseholder/tenant from objecting at planning.

The Telford Homes design is typical of modern Urban design with balconies utilised as amenity space. These do limit light availability and it can be argued that there is a trade between light and amenity and that the balconies are the reason for the light issue rather than the neighbouring development. This is true to an extent however my view is that one should still consider what will be the residual levels of daylight for the occupant, the balcony will not be removed and they will have to live in the consequent conditions.

5. IPG – The Interim Planning Guidance was indicative and did not have any Daylight or Sunlight analysis with it. It clearly states that any scheme should comply with these guidelines. It is clear to me that an attempt to reduce the level of impacts to neighbours would not allow the version of the IPG massing shown in the GIA documentation to be built. There would be a significant reduction in unit numbers and or loss of amenity space. The GLA will have its own view on the weight of the IPG itself and the massing view drawn. My view is that if a Daylight analysis had been undertaken at the time of the IPG then the massing suggested with the IPG would not be as shown in the GIA analysis.

Conclusion

There are clearly still a high number of rooms impacted and it should be remembered that these are virtually all flats and thus each room will mean one occupant impacted. The assessment has been made on new lower target criteria than the BRE headline guidance and the number of failures should be seen in that context.

I think it remains my view that given the above this is still a very high number of residual impacts to consider although of course you will as ever weigh the balance of these against the benefits of the scheme and in the normal planning context.

I trust that is helpful.

Yours sincerely



Ian Absolon
Head of GVA Schatunowski Brooks
For and on behalf of GVA Grimley Limited

Paul Robinson

From: Julian Shirley <[REDACTED]@dp9.co.uk>
Sent: 14 March 2016 20:03
To: Matt Christie
Cc: Jonathon Weston; COUGHLAN, Tony; 'Kevin Murphy'
Subject: FW: The Goodsyrd - Heritage issues
Attachments: 1455 KMH response to GLA comments March 2016 R1.pdf

Matt

Further to the email below and our subsequent meeting, please see attached a response to the comments raised in respect of the heritage issues.

Regards

Julian Shirley

direct: 020 7004 [REDACTED]
mobile: 07795 [REDACTED]
e-mail: [REDACTED]@dp9.co.uk

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From: Matt Christie <[REDACTED]@london.gov.uk>
Date: 24 February 2016 at 15:52:10 GMT
To: 'Jonathon Weston' <[REDACTED]@ballymoregroup.com>
Cc: "[REDACTED]@hammerson.com" <[REDACTED]@hammerson.com>, "Julian Shirley" <[REDACTED]@dp9.co.uk>
Subject: RE: The Goodsyrd - Heritage issues

Jon,

It was a telephone call, followed by an outlook invite. The content was as follows:

Kevin/ Edmund,

As discussed earlier today I have arranged this meeting to go through the outstanding heritage issues, set out below, and agree a way forward. I would advise reading the LBH report in advance of the meeting (attached) but I have also attached my cut/ paste 'most relevant paras' as a way of helping you focus on what is a rather confusing report. Please give me a call in advance if you have any questions, otherwise I look forward to seeing you next Wednesday.

Thanks

[Outstanding issues and current GLA thinking, as discussed by myself and Edmund:](#)

1. Whether R4 and B2 are listed, and the justification requirement for that

Having examined the Historic England listing entry on the National Heritage List we are of the view that the listed wall with the Oriel Gate in continues round the corner into Commercial Street – the design/construction in terms of the facing brickwork is identical so we don't see how an arbitrary cut-off point vis-à-vis the extent of listing/curtilage has been chosen before the curve to exclude the remainder of what is a continuous structure including R4 and B2. The presumption therefore would be the retention of this entire structure with sensitive breaches in the enclosure made to create openings into the new development behind rather than the wholesale demolition of R4 and B2. A comprehensive statement of justification for the removal of any part of this structure or its modification is therefore required which must accord with national, GLA and local heritage policy and heritage guidance issued by Historic England.

2. The specific treatment of the Oriel Gate- shape, materials, historic accuracy, type of glazing etc – We still need to thoroughly examine all the drawings for any assessment of these details, however, are inclined to share LBH's concerns on this matter. For discussion with Kevin.
3. The phasing and exposure of the structure to the elements during and post construction – if the listed oriel bay and south-western boundary wall are to be restored as part of a later phase we need a formal undertaking from the applicant that the condition of this heritage asset will be stabilised as soon as possible to ensure no further deterioration and that any existing structural problems will be remedied as part of the first phase to ensure the stabilisation of this asset until the time comes to complete its restoration and incorporation into the third phase.
4. The requirement of a method statement. This would be an entirely reasonable component to condition provided we have the written undertaking from the applicant that they fully intend to do this and are entirely happy to accept this condition.
5. The requirement for specific designs for the shops in the gate, as opposed to alternative ones. We agree with LBH that we do need this now as we cannot weigh up the benefits/disbenefits of the proposal upon this listed structure without assessing the detailed plans for shopfronts etc and therefore cannot properly assess or determine the LBC. We are entirely sympathetic to LBH's view on the proposed fenestration within the Oriel.
6. The specific uses in vaults G1 to G4. We do not need to know the specific uses – but we certainly want active uses on this important high street frontage and at the very least need to be satisfied that they are committed to a general specification of A uses (rather than potentially non-active uses e.g. B1).
7. The removal of undesigned heritage assets – Lets discuss further with Kevin.

Thanks

Matt

From: Jonathon Weston [[mailto:\[REDACTED\]@ballymoregroup.com](mailto:[REDACTED]@ballymoregroup.com)]
Sent: 24 February 2016 15:48
To: Matt Christie
Cc: [REDACTED] [hammerson.com](mailto:[REDACTED]@hammerson.com); Julian Shirley
Subject: Re: The Goodsyrd - Heritage issues

Matt

Thanks

Can you confirm time for the meeting and forward the email sent to Kevin

Thanks

Sent from my iPhone

On 24 Feb 2016, at 15:42, Matt Christie <[REDACTED]@london.gov.uk> wrote:

Jon,

FYI, I have now spoken to Kevin and arranged a meeting with myself and Edmund for next Wednesday, 2 March, at City Hall. I've emailed him the points I mentioned below.

Thanks

Matt

From: Matt Christie
Sent: 24 February 2016 14:39
To: 'Jonathon Weston'
Cc: [REDACTED]@hammerson.com; 'Julian Shirley'
Subject: RE: The Goodsynd - Heritage issues

Jon,

With reference to the heritage issues discussed below. I have now sat down and gone through these with Edmund Bird and I will soon have a comprehensive list of specific points for Kevin Murphy to consider. I suggest that I email this directly to Kevin as a prelude to a meeting at which myself, Kevin and Edmund go through the list and thrash out a very clear set of actions for Kevin to follow-up. This seems to me the most effective way of resolving this quickly.

If you agree, could you please speak to Kevin about his availability on Friday 4th March (bearing in mind our meeting at 1130) and let me have his email address.

Thanks

Matt

From: Matt Christie
Sent: 22 February 2016 17:22
To: 'Jonathon Weston'
Cc: [REDACTED]@hammerson.com; Julian Shirley; Dutch, Claire; Wood, David; Esther Thornton
Subject: RE: The Goodsynd - Further amendments to CiL/s106 payments and delivery triggers

Jon,

Thanks for confirming your revised position on behalf of the JV. I'll get back if I have any questions.

With regards the outstanding heritage issue, this is connected to the listed building application 2014/2427. LB Hackney listed the following as a reason for refusal:

The detailed proposals for the listed Oriel Gate and associated structures result in direct and substantial harm to the designated heritage asset. It is considered that the development goals could be achieved without the harm caused. The proposed development is considered contrary to Policy CS 25 of the Hackney Core Strategy 2010 and DM28 of the Hackney Development Management Local Plan 2015. The proposed development is considered contrary to BG9 of the Bishopsgate Goods Yard IPG 2010

The Officer's Report is available at this link:

<http://mginternet.hackney.gov.uk/documents/s46507/Goods%20Yard%20Com%20Report.pdf>

In the Officer's Report, the following parts are most relevant:

- Para 4.81.1, page 36 conservation
- Para 4.10.1, page 45 design
- Para 6.5
- Paras 6.7 design
- Para 8, page 86, recommendations

LB Tower Hamlets advised that the Mayor should determine their LB consent as he sees fit, and suggested conditions.

As you will see from reading the relevant paras, it's a little confusing and unclear as to whether Hackney object or not. They seem quite definitive on some elements-specific treatment of the Oriel gate, bringing the phasing forward and being specific about designs for the shop fronts, but less clear on this issue of listing. I am looking at this with our heritage advisor (who may need a conversation with Kevin Murphy) and will revert when we have a GLA view.

Thanks

Matt

From: Jonathon Weston [[mailto:\[REDACTED\]@ballymoregroup.com](mailto:[REDACTED]@ballymoregroup.com)]
Sent: 22 February 2016 15:14
To: Matt Christie
Cc: [REDACTED] [hammerson.com](mailto:[REDACTED]@hammerson.com); Julian Shirley; Dutch, Claire; Wood, David
Subject: The Goodsynd - Further amendments to CiL/s106 payments and delivery triggers
Importance: High

Matt

Further to the meeting last week at which the JV set out its revised position in the context of the above, I confirm the following on behalf of the JV;

1. 12 Intermediate Affordable Housing Units in plot C – Agreed
2. Phase 1 of the Park (plot H) delivered prior to occupation of plot C – Agreed

3. Full employment contribution (as requested in the Borough Committee report) – Not Agreed – No substantiation/supporting information provided by either Borough. JV position remains
4. Additional LBTH highways improvements in addition to the Bethnal Green Road Crossing – Not Agreed – No substantiation/sporting information provided to support the request
5. Payment of PiL – 100% on Commencement (50% for each building)– Not Agreed – JV propose 50% payable by each building on commencement of each buildings superstructure above podium level (above Level 2 +27m AOD)
6. With regard to point 2 – the JV also confirm that they will except the same trigger for the park in phase 4 – i.e. delivered prior to occupation of plot D

Should you have any questions please let me know.

On a linked point, please can you circulate correspondence relating to the heritage issues raised by LBH in order for the JV to be able to respond fully to any issues raised.

Regards

Jon

Jonathon Weston
Projects Director

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<image001.png>

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Bishopsgate Goods Yard - matters raised by LB Hackney relating to heritage assets

- 1 This note responds to points set out in an email from Matt Christie of the Greater London Authority to Kevin Murphy of KMHeritage and Edmund Bird of the Greater London Authority, dated 24 February 2016, and discussed in a meeting at the Greater London Authority on Wednesday 2 March 2016 attended by the Greater London Authority, representatives of the Joint Venture, DP9 and KMHeritage.
- 2 The text below refer to the numbered list of issues raised in the email concerning the proposed redevelopment of the Bishopsgate Goods Yard, and specifically comments made in a report to LB Hackney's Planning Sub-Committee meeting of 10 December 2015. Comments by the Greater London Authority are shown in italics.

Whether R4 and B2 are listed

Having examined the Historic England listing entry on the National Heritage List we are of the view that the listed wall with the Oriel Gate in continues round the corner into Commercial Street – the design/construction in terms of the facing brickwork is identical so we don't see how an arbitrary cut-off point vis-à-vis the extent of listing/curtilage has been chosen before the curve to exclude the remainder of what is a continuous structure including R4 and B2. The presumption therefore would be the retention of this entire structure with sensitive breaches in the enclosure made to create openings into the new development behind rather than the wholesale demolition of R4 and B2. A comprehensive statement of justification for the removal of any part of this structure or its modification is therefore required which must accord with national, GLA and local heritage policy and heritage guidance issued by Historic England.

- 3 R4 is retained in the proposed scheme.
- 4 We have not seen the advice that is alleged to have been received by LB Hackney by email dated 18 February 2015, referred to at Paragraph 6.5.9 of the LB Hackney report. We note that the paragraph suggests that Historic England does not actually indicate that it believes the wall south of the Oriel (B2) to be listed - this seems to be an assumption made by Hackney officers, and this is confirmed in Paragraph 6.5.11. The London Borough of Hackney accepts, at Paragraph 6.5.12 of its report that 'Historic England advice is clear that Vaults V1 and V2 are not listed'.

5 We do not agree in any way that the list description implies that the wall to Commercial Street forms part of the listing. The reasoning set out in the LB Hackney report is, we believe, highly questionable - it is arbitrary and subjective throughout and technically weak in its analysis of the matter in question. We believe that LB Hackney are simply incorrect in making this assertion, and do not provide any kind of proper evidence for its position.

6 The list description reads as follows:

SHOREDITCH HIGH STREET EI 1. 5013 (East Side) ----- Forecourt
Wall and Gates to Old Bishopsgate Goods Station TQ 3382 35/558 II

2. Late C19. At east side a red brick wall having wide entrance with stone entablature and tall panelled parapet over holding elliptical oriel bay with 3 sash windows. Oriel is of stone with console bracketed cornice and scrolled abutments to parapet. Hoodmoulds over windows. Double wrought iron entrance gates, each of 3 panels with large ornamental medallion in centre panel, and top cresting. Double standards below half rail. Running west from the north corner of the entrance bay a long single gate with curved slope down from left to right. 4 panels with medallions, similar to other gate, and double standards below half rail. Cresting on top slope, and date: 1884. A tall ornamental cast iron pier, with lamp-brackets, holds west end of gate, which fastens to shorter similar pier attached to wall at right.

Listing NGR: TQ3349082216

7 It is abundantly clear that the intent of the listing decision made and the special architectural and historic interest that is identified relates to the Oriel, its host structure and the gate that is immediately adjacent to it. It is a matter of common sense that the listing does not relate to any structure further afield. It almost certainly would not have been in the mind of the decision maker at the time of the listing (1975) to include structures further afield. At that time far more of the encircling wall to the Goods Yard survived and would thus have been explicitly referred to in a list description intended to describe special interest.

8 In making these comments we are aware that list descriptions are for identification purposes only, and do not constitute an exhaustive description of special architectural and historic interest. However we believe that to include the B2 wall in the listing of the Oriel and the R4 gate is to willfully expand the extent of listing to an unacceptable and unjustified degree.

9 A detailed and extensive justification for the proposals has been provided in the planning submission. This justification makes clear the effect that the removal of the

Commercial Street wall has on the heritage significance of the Goods Yard site, and that this effect is acceptable in heritage terms. It demonstrates how the proposals comply with the Planning (Listed Buildings and Conservation Areas) Act 1990 and with local and national policy and guidance, and how the overall scheme delivers very substantial public and heritage benefits.

- 10 The Goods Yard project has taken a number of years to develop. During a very long pre-application process every single key stakeholder has been shown the proposals for the western end of the site on a number of occasions, and has had multiple opportunities to comment on heritage significance, the extent of listing and the nature of the proposals. The key stakeholders include the London Boroughs of Hackney and Tower Hamlets, English Heritage/Historic England, Historic Royal Palaces - and the Greater London Authority. The assessment by the applicant's consultants as to what was listed on the site and the nature and distribution of heritage significance on the site has been accepted and agreed. At no point in that process has it been suggested that the wall to the south of the Oriel is listed.
- 11 The proposals to remove the wall to the south of the Oriel has been examined and accepted repeatedly in these discussions. Detailed engineering assessment of the wall to the south of the Oriel has shown that it is in very poor structure condition, and any intervention would involve substantial rebuilding. In addition, 'sensitive breaches in the enclosure made to create openings into the new development behind' would be severely compromised by the physical reality of the structure, which would create cramped, low-head-height and compromised access to the regenerated Goods Yard.
- 12 This, in turn, would directly contradict the achievement of what was considered by stakeholders and the Greater London Authority, and which was agreed to be of key importance to the success of the project - creating clear permeability into the site from Shoreditch High Street and the west.

The specific treatment of the Oriel Gate- shape, materials, historic accuracy, type of glazing etc.

We still need to thoroughly examine all the drawings for any assessment of these details, however, are inclined to share LBH's concerns on this matter.

- 13 We note the comments raised in Paragraphs 6.5.18-6.5.20 in the LB Hackney committee report. As discussed at our meeting, the applicant considers that the treatment of the concrete wall and details of how this would be attached to the existing perimeter wall could be conditioned (Paragraph 6.5.18). Furthermore, the applicant confirms that the 'show of arms' (presumably coat of arms) is proposed to be reinstated at the top of the Oriel Gate (Paragraph 6.5.19). The applicant

confirms that painted timber sash windows can be reinstated, rather than inserting toughened glass infills of the openings in the Oriel. Overall, the applicant would welcome matters of detail associated with the use of materials, type of glazing etc. being the subject of a condition to any listed building consent.

The phasing and exposure of the structure to the elements during and post construction

If the listed oriel bay and south-western boundary wall are to be restored as part of a later phase we need a formal undertaking from the applicant that the condition of this heritage asset will be stabilised as soon as possible to ensure no further deterioration and that any existing structural problems will be remedied as part of the first phase to ensure the stabilisation of this asset until the time comes to complete its restoration and incorporation into the third phase.

- 14 The applicant confirms that the condition of the heritage asset will be stabilised during and post construction, and believes that this could be secured by way of an appropriately worded condition on the grant of any listed building consent.

The requirement of a method statement.

This would be an entirely reasonable component to condition provided we have the written undertaking from the applicant that they fully intend to do this and are entirely happy to accept this condition.

- 15 The applicant agrees to the requirement for the submission of a method statement pursuant to an appropriately worded condition.

The requirement for specific designs for the shops in the gate, as opposed to alternative ones

We agree with LBH that we do need this now as we cannot weigh up the benefits/disbenefits of the proposal upon this listed structure without assessing the detailed plans for shopfronts etc and therefore cannot properly assess or determine the LBC. We are entirely sympathetic to LBH's view on the proposed fenestration within the Oriel.

- 16 Drawing PC(31) 9 is submitted with the application and shows the single proposed shop front in Plot L.

The specific uses in vaults G1 to G4

We do not need to know the specific uses – but we certainly want active uses on this important high street frontage and at the very least need to be satisfied that they are

committed to a general specification of A uses (rather than potentially non-active uses e.g. B1).

- 17 The applicant confirms that vaults G1, G2 and G3 can be used for active uses, such as retail. Vault G4 is proposed as a pedestrian route and so will be “active”.

The removal of undesignated heritage assets

- 18 The comments of the London Borough of Hackney concerning non-designated heritage assets (referred to in its report as ‘undesignated heritage assets’) are barely comprehensible; the report is confused and contradictory in addressing this matter. The failure to correctly number paragraphs within the report does not assist in understanding what the Council is trying to say. However, while implying that the Council believes that the proposed scheme causes harm to non-designated heritage assets, the report seems to suggest that the proposals are acceptable.
- 19 As stated above, a detailed and extensive justification for the proposals has been provided in the planning submission. This justification makes clear the effect that the removal of the Commercial Street wall has on the heritage significance of the Goods Yard site, and that this effect is acceptable in heritage terms. It demonstrates how the proposals comply with the Planning (Listed Buildings and Conservation Areas) Act 1990 and with local and national policy and guidance, and how the overall scheme delivers very substantial public and heritage benefits.

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Paul Robinson

From: Emma Cartwright <[REDACTED]@gia.uk.com>
Sent: 08 March 2016 17:26
To: Matt Christie; [REDACTED]@gvasb.co.uk
Cc: Gordon Ingram; Joanna Lyons; Stephen Friel; [REDACTED]@dp9.co.uk; COUGHLAN, Tony; [REDACTED]@ballymoregroup.com
Subject: Bishopsgate Goodsyrd Additional Information (Daylight and Sunlight)

Dear Matt/Ian,

Please find below a link to download the updated report following on from previous discussions regarding the above:

[Bishopsgate Goodsyrd Additional Information \(GLA\)](#)

If you have any queries about anything within, please don't hesitate to contact Gordon or Stephen.

Kind regards,

Emma Cartwright
EIA Coordinator
DD 020 [REDACTED]



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Paul Robinson

From: Julian Shirley <[REDACTED]@dp9.co.uk>
Sent: 08 March 2016 16:48
To: Matt Christie
Cc: Stephen Friel; Jonathon Weston; Tony COUGHLAN
Subject: Re: BGY- Voicemail

Matt

Thanks. GIA will send through a link to yourself and to GVA later.

Regards

Julian Shirley

DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

Tel. 020 7004 [REDACTED]

Facsimile 020 7004 [REDACTED]

On 8 Mar 2016, at 15:48, Matt Christie <[REDACTED]@london.gov.uk> wrote:

Hi Julian,

Just got back to my desk and got your message. Thanks for chasing the D/S stuff and yes, please email to myself and GVA. I'll let you know if I have any questions, once received.

Speak soon.

Matt Christie | Senior Strategic Planner and Urban Designer | Development & Projects

Greater London Authority | City Hall, The Queen's Walk, More London Riverside, London SE1 2AA

Tel: 020 7983 [REDACTED] Email: [REDACTED]@london.gov.uk

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