



22 November 2022

Dear Ms Thatcher,

Planning Application 21/2758/FUL

With reference to visuals included the October 2022 Daylight/Sunlight Impact documents.

The Daylight/Sunlight Impact documents focussed primarily on the impact of the proposed development on (1) existing neighbouring properties and (2) the residential/commercial units that are part of the proposed development.

There is very little assessment - except to state that it meets the minimum requirement - of the impact of the shadows created by proposed development on the riverside open space.

**Page 9: Proposed (October 2022 Daylight/Sunlight Impact)**



## Page 10: Proposed (October 2022 Daylight/Sunlight Impact)



The Daylight/Sunlight report makes reference to the BRE. The BRE Trust describes itself as “an independent charity dedicated to improving the built environment for the benefit of all.”

The above report quotes from the BRE document “Site Layout Planning for Daylight and Sunlight: a guide to good practice.”

Section 3.3 of this guide to good practice refers to Gardens and Open Space.

The opening paragraph of this section states:

Good site layout planning for daylight and sunlight should not limit itself providing good natural light inside buildings. Sunlight in the spaces between buildings has an important impact in the overall appearance and ambience of a development.

The Applicant’s report refers to the good practice that “at least half of the amenity areas [...] should receive at least two hours of sunlight on 21 March.”

The BRE guide continues, though, with further guidance regarding Public Open Spaces:

### 3.3.12

For critical areas, particularly in public open spaces, it is suggested that a more detailed study of sunlighting potential be carried out [...]

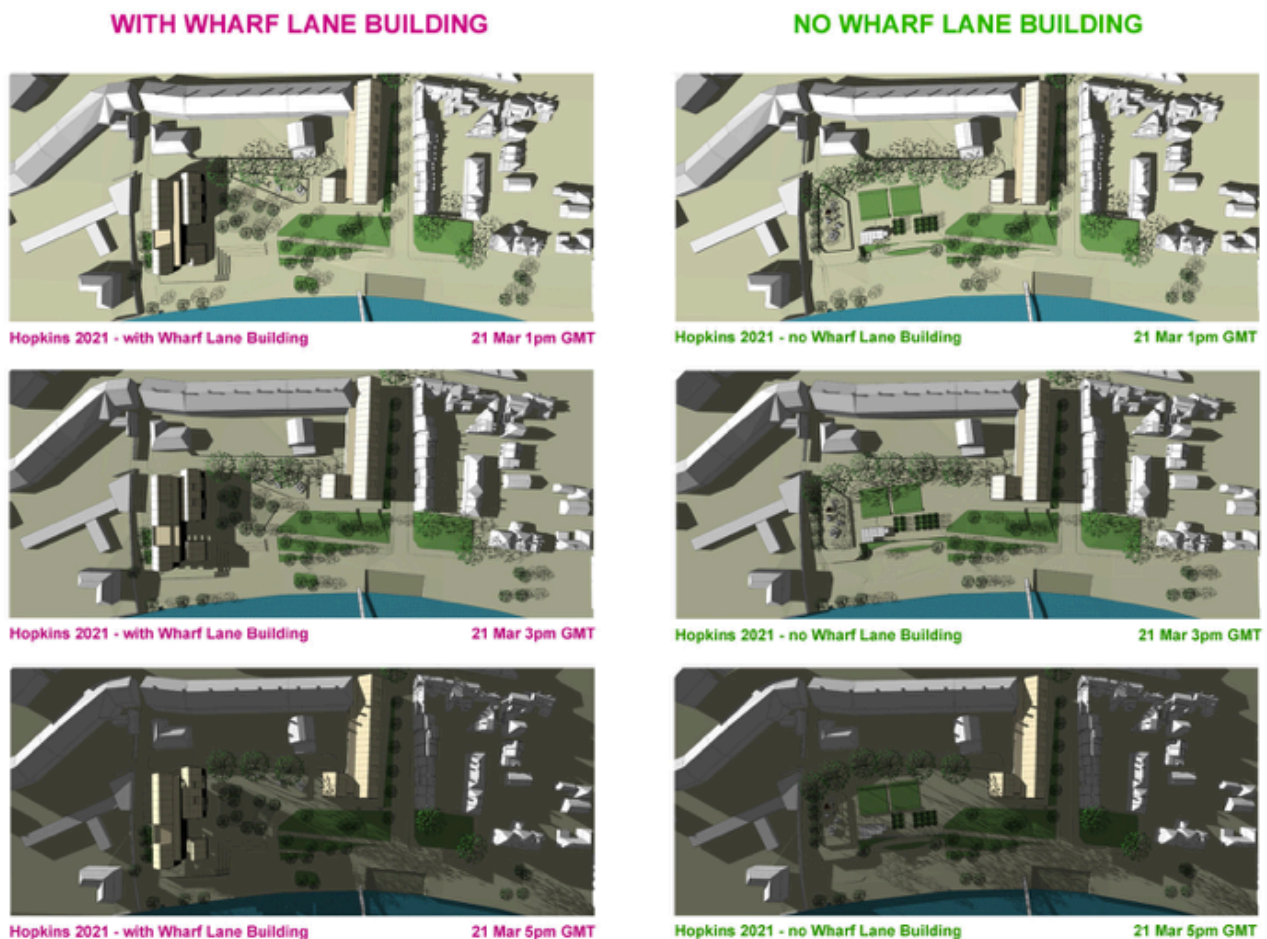
### 3.3.13

Where a large building is proposed which may affect a number of gardens or open spaces it is often illustrative to plot a shadow plan showing the location of shadows at different times of day and year. [...] Where there are existing buildings as well as the proposed one, 'before' and 'after' shadow plots showing the difference that proposed building makes may be helpful [...]

### 3.3.14

If a space is to be used all year round, the equinox (March 21) is the best date for which to prepare shadow plots as it gives the average level of shadowing.

Using the above models, the Trust has commissioned shadow studies, showing the impact of the proposed buildings, especially the 5-storey Wharf Lane Building situated on a 2.5m high riverside podium:



Where currently both the Diamond Jubilee Gardens and the Embankment receive significant amounts of daylong sunshine, ensuring that these areas are year-round amenity spaces, the proposed Wharf Lane Building introduces deep shadowing across areas of proposed Public Open Space, and in doing so negatively impacts the year-round appeal and therefore usage of such areas.

With my best wishes,

Ted Cremin  
Chair, Twickenham Riverside Trust