[redacted]

From: Alex Ferguson [redacted]
Sent: 12 December 2024 12:08
To: Tastsoglou, Anna [redacted]
Subject: In support of Holland House - from Fuel

Dear Anna,

I am writing in support of the future development of Holland House, London EC3A 5AR to become a new shining beacon of community, collaboration and culture in the heart of the city of London. Planning Application Number: 24/00021/FULEIA. The valuable scoping work down by the team behind the development shows thoughtfulness and consideration for the local community.

At Fuel we are planning an artist residency and engagement programme with Holland House, bringing first class artists and educators into the space to make new shows in research and development, and run creative workshops with local schools and communities.

Fuel leads the field in independent producing in the UK's live performance sector, working with brilliant artists to explore urgent questions, to shine light on how we relate to each other and the world around us, and to tell untold stories by underrepresented voices. Fuel produces high quality new theatre that reaches diverse audiences through tours to venues in the UK and internationally, collaborating with outstanding theatre makers with fresh perspectives and approaches who produce shows, performances or experiences which have direct and playful relationships with their audiences. Fuel leads the sector in terms of co-creation and depth of engagement to build audiences and bring people together.

Fuel was founded in 2004 and is led by Kate McGrath. Since its story began, Fuel has produced shows, festivals, films, installations, podcasts, apps and books. In doing so, Fuel has supported the artistic development of over 120 lead artists or companies and reached more than a 1.5 million people live and digitally, hosted over a hundred internships and been recognised with awards for its work.

Fuel is currently working with artists and companies including Travis Alabanza, Common Wealth, Inua Ellams, Keisha Thompson, Alan Lane, Hannah Lavery, Racheal Ofori, and Toby Olié.

We believe Holland House will be vital for ensuring an accessible and adaptable hub for the arts in the centre of London - from rehearsal space to flexible workspaces, social enterprise areas, and being a host for public facing arts exhibitions and events - it is much needed and beneficial to business and communities alike.

All the best,

Alex Ferguson (He/Him)

Development Producer

[redacted]

Fuel is 20! Click here to find out about our 20th anniversary season – we hope you can join us!

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Somerset House, Strand, London, WC2R 1LA
www.fueltheatre.com
(Please note: Fuel operates a hybrid working policy, with staff members working partly from Somerset House, and on remote)

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Anna Tastsoglou
Planning Team
Environment Dept
City of London
P.O.Box 270
Guildhall
London
EC2P 2EJ

11th December 2024
Ref: Bevis Marks

Dear Ms Tastsoglou

Planning Application Ref 24/00021/FUL/EIA
1-4, 31 and 33-34 Bury Street London EC3A 5AR

I am a Chartered Surveyor, founder and former senior partner of Delva Patman Redler LLP, specialists in rights to light, daylight and sunlight and neighbourly matters. I am a director of Pennycrest Consultancy Ltd.

I have been asked by representatives of the Bevis Marks Synagogue to provide an overview on the various studies and reports commissioned to assess the potential impact on daylight, sunlight , overshadowing and lunar transit on the Synagogue. I am a Chartered Surveyor, founder and former senior partner of Delva Patman Redler LLP, specialists in rights to light, daylight and sunlight and neighbourly matters.

To this end I have reviewed the following:-

- GIA Daylight & Sunlight Report Contained within Chapter 10 of the EIA for the planning application
- Bevis Marks Daylight Report 2024 dated 26th October 2024
- BRE Report P128053-1000 dated 16th August 2024 plus the BRE addendum letter P128053-1002 dated 7th October 2024 and BRE addendum letter 9th December 2024
- BRE Report P128053 -1001 dated 4th November 2024
- HPG objection letter dated 15th May 2024 and GIA response letter dated 23rd September 2024 together with DP9 response letter dated 27th September 2024

I have not undertaken any independent technical analysis and have relied on the data and results provided in the various studies and reports available in the public realm or made available to me together with other documents providing background information and context

The BR guide 'Site Layout Planning for Daylight and Sunlight' methodology used by GIA for the daylight, sunlight and overshadowing studies follow industry standard practice adopted by the City to assess development impact on existing buildings. It is primarily focused on safeguarding the impact on existing buildings in residential use and is not designed to assess the impact on unique buildings such as the Bevis Marks Synagogue. BS 8206 Code of Practice for Daylight should be used in conjunction with the BR guide but again the BS does not cover specific buildings such as the Synagogue.

There is no similar published guidance on assessing the impact of lunar transit which is acknowledged by the BRE in its commentary reports.

Therefore it is questionable as to whether the criteria applied and the results and conclusions generated by the GIA and BRE various reports are entirely relevant when considering the impact on the beneficial use of the Synagogue as a place of worship, religious ritual and community engagement.

If, for the purpose of discussion, the methodology adopted is accepted, a fundamental question arises as to the accuracy of the output data from the analysis where the source data used for the computer modelling is not based on actual geometric measurement. This means that the 3D modelling generated of the existing

site, the neighbouring buildings and the Synagogue is inherently flawed. This is then compounded by the 3D modelling of the proposed development when comparing cumulative impact on the Synagogue.

This must throw into question the reliability of the GIA studies and the conclusions reached.
Even if these flaws are discounted and the results taken at face value, it does not change the conclusions that the development will significantly reduce the existing light levels within the Synagogue , cause greater overshadowing of the courtyard and severely compromise views of the sky and the moon For example , despite GIA demonstrating that existing daylight and sunlight levels are low , and already below the absolute 27% target proposed in the BR 209 guide, they assert that further reduction would result in an acceptable *'minor adverse'* category of impact. To quantify the degrees of *'adverse'* impact is misleading and disingenuous. Something is either adverse or it is not and the results produced by the GIA studies demonstrate this. It is of merit to note that in its report dated 9th December 2024 page 5, BRE chose to make no comment on this conclusion.

Furthermore , the methodology applied to measure illuminance levels in the Bevis Marks Daylight Report, accepted by BRE as being a reasonable method of assessment even with the shortcomings identified, does demonstrate that , the impact will in result in a loss of daylight at key times of the day throughout the year. The BRE Report supports the Bevis Marks conclusions that the development will cause a reduction to the daylight levels.

The BRE 209 Guide and related British Standard Codesof Practice were not designed to be used to assess the impact on unique buildings like the Bevis Marks Synagogue. The standards and criteria proposed within these documents are regarded as the minimum standards for daylight, sunlight and overshadowing. Where such standards are already demonstrably below in the existing condition, it is unacceptable to condone any further reduction that will affect the beneficial use of the affected building, in this case a Grade 1 place of worship and ritual , is not affected.
The City should refuse planning on these grounds alone.

Yours sincerely

[redacted]

Delva Patman FRICS ACIArb
Director

DATE / REF

12/12/2024
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Anna Tastsoglou
Principal Planning Officer (Development Management)
Environment Department
City of London
Guildhall
London EC2V 7HH

Dear Ms. Tastsoglou,

Re: Planning Application Reference: 24/00021/FULEIA, 1-4, 31 and 33-34 Bury Street, London, EC3A 5AR

This note has been prepared by GIA in response to the letter dated 11th December 2024 prepared by Delva Patman of Pennycrest Consultancy Ltd ('Pennycrest').

BRE Guidance does not specify, and as such does not exclude, the use of its methodologies to quantify daylight and sunlight changes to a place of worship. BRE's methodologies have been used to test places of worship many times before in the City of London as well as across London and the UK, and as such it is reasonable to assume that they would provide adequate guidance in this instance too.

The letter of objection prepared by Pennycrest questions the origin of the 3D model data used in GIA's assessments by stating that: *"a fundamental question arises as to the accuracy of the output data from the analysis where the source data used for the computer modelling is not based on actual geometric measurement.".* The methodology section of GIA's reports however state that: *"The three dimensional representation of the proposed 31 Bury Street development and the Bevis Marks Synagogue been modelled based on the drawings and 3D model used for GIA's Rights of Light assessment. This has been placed in the context of its surrounding buildings which has been modelled from survey information, photogrammetry, OS and site photographs and allows for a precise model which in turn ensures that the analysis accurately represents the amount of daylight available to the building facades, internal and external spaces."* The Synagogue's courtyard and the immediate surrounding buildings have been laser scanned and point cloud data used to generate accurate window locations.

It should also be noted that BRE has undertaken their independent measurements of material reflectance and glazing transmission of the Synagogue in particular, which closely matched the assumptions made in the daylight modelling undertaken by GIA. It would be fairer to state that the accuracy of the *"source data used for the computer modelling"* is greater than the industry standard and reflective of the sensitivities related to the context of this proposed building.

In relation to the interior daylight levels within the Synagogue and the Bevis Marks Daylight Report, Pennycrest agrees that BRE's report states that the development will cause a reduction to daylight levels.
However, in assessing the significance and quantum of overall reduction, BRE concludes that *"the overall impact on daylight and sunlight would be assessed as minor adverse."* which aligns with GIA's conclusions.

In summary, GIA believes that BRE's guidance and the British Standards provide appropriate methodologies to consider daylight and sunlight impacts during the planning process, and that has been the case in the consideration of planning applications in the City of London and across the UK.

We trust that this note provides a helpful response to the points made by Pennycrest and their letter of objection.

Yours sincerely,
GIA