



## By Email

Craig Newton  
London Borough of Southwark  
5th Floor, Hub Two  
London  
SE1P 5LX

Dear Craig

### Re: 15 Blue Lion Place Daylight and Sunlight – Supplementary Note

I write with respect to the representation made by NRG Consulting on behalf of Kathleen Langford, in relation to the planning application scheme for the Site at 15 Blue Lion Place (NRG report reference DSA/SB/19122017-AV, dated 8/2/18, issued to Southwark 21/03/2018). The representation concerns claimed loss of Daylight and Sunlight to Unit 16, Blue Lion Place.

Firstly, there is doubt over the viability of the NRG Report, as the technical analysis undertaken has been estimated and is not verified, and therefore the results provided cannot be relied upon. GIA's own technical assessment (GIA report reference AC/11934, dated 02/12/2017) was based on measured survey data and was verified by Trehearne Architects.

With respect to the criteria used to assess the impact of Daylight, the representation makes specific reference to the Building Research Establishment Guidelines, 'BRE' Guidance. The assessment of the effect of the new development on the Daylight and Sunlight enjoyed by occupiers of existing buildings is made by reference to the Building Research Report (2011) entitled, '*Site Layout Planning for Daylight and Sunlight: A Good Guide to Practice*'.

#### 1. Clarification on the technical assessment which forms the basis of our report.

The BRE Guidelines provide two main methodologies for Daylight assessment, namely;

*i. The Vertical Sky Component (VSC)*

The primary methodology is known as the Vertical Sky Component (VSC) which considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the Site. This is a more simplistic approach and it could be considered as a "rule of thumb" to highlight whether there are any potential concerns to the amenity serving a particular property. The NRG report does not provide any comment or findings on VSC.

GIA's Report identifies two of the three windows assessed (67 %) as meeting the BRE criteria. The one window that does not meet the guidelines will retain 16.6 % VSC, which GIA consider to be commensurate given the urban location of the Development Site. In addition, in line with the BRE criteria, this is considered to be a minor transgression given that the reduction is between 20 – 30 % VSC. Southwark Council's report to the committee supports this conclusion.

#### DATE / REF

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26/03/2018

CB/11934

#### ADDRESS

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THE WHITEHOUSE

BELVEDERE ROAD

LONDON SE1 8GA

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#### CONTACT

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TEL 020 7202 1400

FAX 020 7202 1401

MAIL@GIA.UK.COM

.

WWW.GIA.UK.COM

ii. *The No Sky Line (NSL)*

The second methodology is the No Sky Line or Daylight Distribution method ("NSL"). This simply assesses the change in position where the sky can be seen or not seen, from table top height within a room between the existing and proposed situations. It does take into account the number and size of windows to a room.

As identified within our Report, when considering the results of the NSL assessment, all rooms (100 %) relevant for assessment exceed the BRE Guidelines.

The BRE provides one methodology for sunlight assessment:

iii. *Annual Probable Sunlight Hours (APSH)*.

The APSH assessment considers only surrounding receptors (i.e. windows) that face within 90° due south of the Development to be relevant for assessment (not windows that face north).

- It can be noted from review of Unit 16, Blue Lion Place, the windows suitable for assessment do not face within 90° due south.
- Paragraph 3.2.3 of the BRE Guidance states that:

*"To assess the loss of sunlight to an existing building, it is suggested that all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90° of due south".*

As such, we do not consider NRG's use of APSH assessment to be valid in relation to 16 Blue Lion Place.

## **2. Response to the Methodology Considered within the NRG Consulting Report**

- As highlighted within point iii. above, the report considers the use of APSH, which is an inappropriate methodology given the orientation of the adjoining building windows.
- The NRG Report considers the use of ADF methodology, which the BRE Guidance does not consider appropriate for adjoining properties and should rather be used to assess new development. Page 64 of the BRE Guidance, paragraph F7, states that:

*"Use of the ADF for loss of light to existing buildings is not generally recommended".*

In any event, the data that NRG Consulting have provided for ADF cannot be taken as meaningful, as they have not verified the use of external or internal reflectants used and do not state what type of glazing has been allowed for. As quoted within the Guidance under paragraph 2.1.11, "ADF depends on room reflectances".

Accordingly, we cannot agree with the conclusions reached in the NRG Report and consider that limited weight can be attributed to their Report.

I trust that the above provides a full response in relation to the Report provided by NRG Consulting, given the late submission of their representation.

Kind regards,  
Yours sincerely  
For and on behalf of GIA



**Cathryn Buckland**  
Senior Surveyor  
Cathryn.buckland@gia.uk.