Daylight and Sunlight Report

Blackheath Station Car Park,

London,

SE3

21st March, 2025

CHP Surveyors Limited
2-6 Boundary Row
London, SE1 8HP

Tel: 020 3714 4090
enquiries@chpsurveyors.com
www.chpsurveyors.com

Contents

1.0	Executive Summary
2.0	Policies and Guidance
3.0	Information
4.0	Site and Proposals
5.0	Limitations
6.0	Methodology
7.0	Surrounding Properties
8.0	Daylight and Sunlight Assessment of Neighbouring Properties
9.0	Daylight and Sunlight Assessment of Proposed Accommodation
10.0	Overshadowing Assessment
11.0	Conclusion

Appendices

Appendix A	Principles of Daylight and Sunlight
Appendix B	CHP Surveyors Limited Drawing numbers 2676-001, 002, 003, 004, 005, 006, 007, 008, 009, 010, 011, 012, 013, 014, 015, 016A, 017, 018, 019
Appendix C	Daylight Results
Appendix D	Sunlight Results

CHP Surveyors Limited

CHP Surveyors Limited

1.0 Executive Summary

1.1 CHP Surveyors Limited have been instructed by Acorn Property Group to consider the implications the proposed scheme for three mixed use buildings on the Blackheath Station Car Park in the London Borough of Lewisham, will have on the neighbouring residential properties enjoyment of daylight and sunlight.

1.2 An assessment has also been undertaken to establish the level of daylight and sunlight that will be enjoyed by the proposed accommodation as well as the level of sunlight the proposed communal amenity space will enjoy.

1.3 This report accompanies a planning application submitted by Acorn Property Group.

1.4 From our online research and liaison with the project team, we have identified the neighbouring properties that have windows overlooking the site and therefore need to be considered as part of this assessment. These being:

- 5, 6 and 7 Collins Street
- 14-29 Collins Street
- John Ball Primary School
- John Ball Nursery School

1.5 To ensure that this assessment has correctly considered the daylight and sunlight enjoyed by the neighbouring residential properties and proposed accommodation, it has been undertaken in accordance with the Building Research Establishment's publication "*Site layout planning for daylight and sunlight. A guide to good practice.*" (2022) (BRE guidelines). Reference has also been made to established national, regional, and local planning policies and guidance.

1.6 The technical analysis has been undertaken using the standards and tests contained in the BRE guidelines. A summary of the recommendations within the BRE guidelines are set out in the Principles of Daylight and Sunlight, attached at Appendix A of this report.

1.7 The daylight assessment has considered 135 windows within the neighbouring properties that serve 60 rooms. The results of the analysis demonstrate that 111 (82%) of the windows will achieve the numerical values set out in the BRE guidelines.

With regards to the remaining 24, 17 serve the properties on to Collins Street and all achieve a VSC of at least 25%, which with reference to previous Planning Inspectors decisions is considered appropriate for such a location and the other seven serve rooms served by multiple other windows that do achieve the targets and therefore the rooms retain good access to daylight.

1.8 With regard to daylight distribution, 55 (92%) of the rooms assessed within the neighbouring properties will achieve the numerical values set out in the BRE guidelines, with the remaining rooms all having at least 74% of their area infront of the NSL, which is considered appropriate for an urban location such as this.

1.9 The sunlight assessment has considered 57 rooms within the neighbouring properties. The results demonstrate that all of the rooms analysed will achieve the recommendations within the BRE guidelines with regards to annual sunlight and all except two will with regards to winter sunlight. The primary reason for two rooms not achieving the recommendations within the BRE guidelines is due to their orientation. The analysis therefore demonstrates that the neighbouring properties will retain access to good levels of sunlight.

1.10 It is therefore considered that the proposed scheme would not affect the level of daylight and sunlight to the neighbouring properties.

1.11 With regard to the proposed accommodation within the scheme, the analysis has considered 126 habitable rooms and demonstrates all will achieve or exceed the numerical targets with reference to BS EN 17037. The scheme will therefore provide accommodation with good access to daylight.

1.12 In relation to sunlight, the analysis demonstrates that in accordance with paragraphs 3.1.16 of the guidelines, number of units that will have at least one room that will enjoy 1.5 hours of direct sunlight on 21st March has been maximised and therefore the proposals will provide accommodation with good access to sunlight.

1.13 The assessment of the neighbours amenity spaces' access to direct sunlight demonstrates that the taking into the urban location and under developed nature of the site, they will retain appropriate access to sunlight.

2.0 Policies and Guidance

2.1 To ensure that the results of the analysis undertaken are considered correctly, reference has been made to the following national, regional and local policies.

- National Planning Policy Framework (NPPF) – December 2023
- Ministry of Housing, Communities & Local Government Guidance "Effective Use of Land" (July 2019)
- The London Plan – March 2021
- The Mayor of London's Housing Supplementary Planning Guidance (SPG) – March 2016
- London Borough of Lewisham – Lewisham Core Strategy (2011); Lewisham Development Management Local Plan (2014); Lewisham Site Allocations Local Plan (2013); and Lewisham Town Centre Local Plan (2014)
- Building Research Establishment – Site layout planning for daylight and sunlight. A guide to good practice (2022)

2.2 Set out below are the key sections that relate to daylight and sunlight within these documents.

2.3 National Planning Policy Framework – December 2024

2.3.1 Set out within the National Planning Policy Framework (December 2024), under paragraph 130 (c) it states with regard to daylight and sunlight, that consideration should be given as to whether efficient use of the land is being made:

"*…when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide adequate living standards.*"

2.4 Ministry of Housing, Communities & Local Government Guidance "Effective use of Land" (July 2019)

What this means in practice, in relation to assessing appropriate levels of sunlight and daylight, will depend to some extent on the context for the development as well as its detailed design.

For example, in areas of high-density historical buildings, or city centre locations where tall modern buildings predominate, lower daylight and daylight and sunlight levels at some windows may be unavoidable if new developments are to be in keeping with the general form of their surroundings."

2.5 The London Plan – March 2021

2.5.1 Set out under Policy D6 – "Housing quality and standards", it states:

"*D - The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.*"

2.6 Mayor of London – Housing Supplementary Planning Guidance (SPG) – March 2016

2.6.1 The Mayor of London's Housing SPG acknowledges that the BRE guidelines should be applied sensitively and makes reference to the use of alternative targets, as set out in the BRE guidelines. It states under paragraph 1.3.46:

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 recognize that fully optimising housing potential on larger sites may necessitate standards which depart from those presently experienced, but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

Paragraph 2.3.47 of the Housing SPG relates to the necessity for more living and working space and thus greater density. It states:

BRE guidelines on assessing daylight and sunlight should be applied sensitively to higher density development in London, particularly in central and urban settings, recognizing the London Plan's strategic approach to optimize housing output (Policy 3.4) and the need to accommodate additional housing supply in locations with good accessibility suitable for high density development (Policy 3.3). Quantitative standards on daylight and sunlight should not be applied rigidly, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London.

2.7 London Borough of Lewisham

2.7.1 We have reviewed the London Borough of Lewisham have published planning guidance within their document titled Lewisham Core Strategy (2011), *Lewisham Local Development Framework – Development Management Local Plan (adopted November 2014), Lewisham Site Allocations Local Plan (2013) and Lewisham Town Centre Local Plan (2014)* and note that within DM Policy 31, it references the recommendations with regard to daylight and sunlight. It states:

2(c) residential extensions, roof terraces and balconies and non-residential extensions adjacent to dwellings should result in no significant loss of privacy and amenity (including sunlight and daylight) to adjoining houses and their back gardens.

2.8 Building Research Establishment (BRE guidelines)

2.8.1 The Building Research Establishment published a comprehensive revision to the 2022 edition of their guidance on daylight and sunlight within the built environment, titled "*Site layout planning for daylight and sunlight. A guide to good practice*". The BRE guidelines are considered as the recognised methodology used by local authorities when assessing daylight and sunlight.

2.8.2 The BRE guidelines acknowledge that their purpose is not to provide strict criteria in which a development must adhere to, but to provide guidance. This is affirmed within the introduction of the BRE guidelines, where it states under paragraph 1.6:

The guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer.

Although it gives numerical guidelines, these should interpreted flexibly since natural lighting is only one of many factors in site layout design.

2.8.3 The guidelines contain methodology on how to calculate the impact a proposed development will have on the neighbouring residential properties and also how to assess amenity within the proposed units.

2.8.4 It is suggested within the BRE guidelines that residential properties should have the greatest need for good daylight and sunlight and that key habitable rooms should be considered, with these being bedrooms, living rooms and kitchens. For the purpose of our assessment, it is considered that commercial properties do not have a reasonable expectation to daylight and sunlight as they generally rely on artificial light.

2.8.5 An extended account of the BRE guidelines is attached at Appendix A of this report.

3.0 Information

3.1 During the process of undertaking the analysis and producing this report, reference has been made to the following information:

jpa

Drawing Numbers 2209-100, 101, 150, 155, 160, 165, 170, 200, 201, 202, 203, 204, 205, 500, 501, 2209-C-300, 2209-C-400 and 2209-C-400

CHP Surveyors Limited

Information on the internal configuration of the neighbouring properties has been sourced from a review of the London Borough of Lewisham's online planning portal and other online sources such as Rightmove and estate agents' websites.

4.0 Site and Proposals

4.1 The site is located within the London Borough of Lewisham. The existing site is currently an open-air car park as indicated on drawing numbers 2676-001, 003, 005 and 007, attached at Appendix B of this report.

4.2 The proposals are to construct three blocks ranging from three to five storeys in height, as illustrated on drawing numbers 2676-002, 004, 006 and 008, attached at Appendix B of this report.

5.0 Limitations

5.1 To undertake the detailed daylight and sunlight analysis required to produce this report a three-dimensional computer model has been produced using the information provided and sourced by us, as set out in paragraph 3.1.

5.2 Internal access to the surrounding properties was not sought by us. Research was undertaken by us using planning portals and other sources such as estate agent's websites, to try and establish the internal configuration of the surrounding properties and therefore increasing the accuracy of the analysis. Where information of the surrounding properties was unable to be sourced, reasonable assumptions have been made as to the probable room size, layout and use.

5.3 The daylight and sunlight analysis has been undertaken using a specialist software programme by MBS and from this the resultant data has been produced.

6.0 Methodology

6.1 Using the information provided and online research undertaken by us, a 3D computer model of the properties surrounding the site has been produced. The model includes the window locations and internal configuration (either actual or assumed) to the surrounding properties. We have not had access to the surrounding properties that form part of this study and therefore the internal configuration and establishing which windows serve habitable rooms has been based on either onsite observations or information we have been able to obtain online. A 3D computer model of the existing structures on the site as well as the proposals has been produced.

6.2 Using the specialist computer programme, we have undertaken an analysis in accordance with the criteria recommended within the BRE guidelines.

We have run an analysis of the existing situation to establish a baseline figure and then a further analysis with the implementation of the proposals. There is no requirement to consider the implications during the development process as any impact will only be short term.

6.3 As stated in paragraph 1.6 of the BRE guidelines, the intention of the guide is to provide recommendations to assist with site layout design. The criteria should be applied flexibly in line with the context of the site and its environment.

6.4 Therefore, when assessing the results of the daylight and sunlight analysis undertaken, we have considered the location of the site and its surroundings when applying the BRE criteria.

6.5 The guidelines also advise instances when alternative target values may be used. The BRE guidelines are designed to be applied within a suburban environment, not a dense urban location. Section 2.2.3 of the BRE guidelines state:

…numerical values given here are purely advisory. Different criteria may be used, based on the requirements for daylighting in an area viewed against other site layout constraints.

6.6 Daylight

6.7 The numerical values contained in the BRE guidelines are used to establish whether the proposals will have a significant effect on the daylight enjoyed by the neighbouring properties and are based initially on a Vertical Sky Component (VSC) analysis. This analysis establishes the amount of available daylight received directly from the sky for each individual window. The reference point for this analysis is the centre point of the window.

6.8 This analysis advises that each window should achieve a VSC of 27% or 0.8 times the existing value. These values are for a suburban location and is accepted in numerous Planning Inspectors' decisions that these are not appropriate for an urban location.

6.9 The second method to assess daylight is to run a No Sky Line (NSL) or Daylight Distribution analysis. This assesses the change in position of the No Sky Line between the existing and proposed scenarios. It does not consider the number and size of windows serving a room. The BRE guidelines advise that a significant portion of each habitable room (>80%) or at least 0.8 times the existing area should lie infront of the No Sky Line (NSL).

6.10 When considering the level of daylight that will be enjoyed by the proposed accommodation, Section 2.1 and Appendix C of the BRE guidelines sets out the recommended methodology for calculating the appropriate level. This methodology is based on the criteria set out in BS EN17037 and the National Annex.

6.11 The analysis is based on Climate Based Daylight Modelling and sets out recommended minimum levels of Lux, depending on the room use, that should be exceeded for 50% of daylight hours across half of the room area. The analysis takes into account the location of the site within the country by using the relevant meteorological data. The target levels of Lux are:

- Kitchen – 200 Lux
- Living Room – 150 Lux
- Bedroom – 100 Lux

6.12 For the purposes of the analysis, we have used the following parameters, which it is considered appropriately reflect the types of finishes that will be used.

- Glazing transmittance value of 0.68
- Frame correction factor of 0.7
- Maintenance factor of 0.92
- Reflectance for the floors 0.4
- Reflectance value for the walls of 0.7
- Reflectance value for the ceilings of 0.85

6.13 It should be noted that whilst under paragraph C17 of the BRE guidelines it states that where a room has a shared us, the highest target should apply, it continues to advise that the target for a Living Room can be used for a combined Living/Kitchen/Dining Room, if the kitchens are not treated as habitable spaces, to avoid small separate kitchens.

6.14 Sunlight

6.15 Concerning sunlight, the BRE guidelines advise that all windows within 90° of due south should achieve 25% of the Annual Probable Sunlight Hours (APSH) with at least 5% being achieved during the winter months.

6.16 To assess the level of sunlight within the proposed accommodation, reference is made to Section 3.1 of the BRE guidelines, which sets out the recommendations for access to sunlight within new dwellings.

6.17 It states under paragraph 3.1.2 that:

"In housing, the main requirement for sunlight is in living rooms, where it is valued at any time of day, but especially in the afternoon."

It continues to say; "*It is viewed as less important in bedrooms and in kitchens, where people prefer it in the morning rather than the afternoon."*

6.18 The guidelines do however acknowledge that sites within urban locations may have significant constraints with regard to their orientation or overshadowing.

6.19 To assess sunlight within proposed accommodation, the BRE guidelines summarise that:

"*In general a dwelling, or non-domestic building that has a particular requirement for sunlight, will appear reasonably sunlit provided:*

- *at least one main window wall faces within 90° of due south and*
- *a habitable room, preferably a main living room, can receive a total of at least 1.5 hours of sunlight on 21 March.*

6.20 Overshadowing Analysis

6.21 When establishing what areas should be analysed, the BRE guidelines state under paragraph 3.3.3:

"*The availability of sunlight should be checked for all open spaces where it will be required. This would normally include:*

- *gardens, such as the main back garden of a house or communal gardens including courtyards and roof terraces*
- *parks and playing fields*

- *children's playgrounds*
- *outdoor swimming pools and paddling pools and other areas of recreational water such as marinas and boating lakes (the daylight and sunlight effects on permanent residential moorings may be assessed using the methods in sections 2.2 and 3.2)*
- *sitting out areas such as those between non-domestic buildings and in public squares*
- *nature reserves (which may have special requirements for sunlight if rare plants are growing there).*

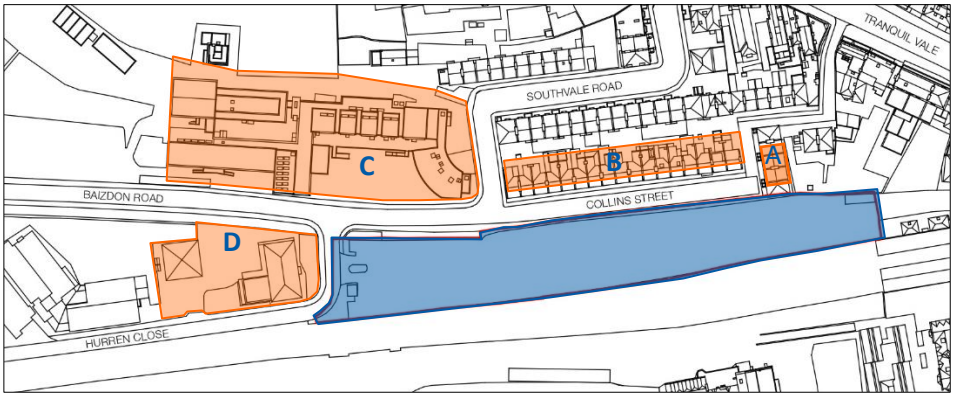
6.22 In terms of how to assess the level of sunlight enjoyed by such spaces, the BRE guidelines advise in paragraph 3.3.17:

"*It is suggested that, for it to appear adequately sunlit throughout the year, at least half the garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area that can receive two hours of sun on 21 March is less than 0.80 times its former value, then the loss of sunlight is likely to be noticeable.*"

7.0 Surrounding Properties

7.1 Within the BRE guidelines it is recommended that only residential properties that contain windows serving habitable rooms and therefore have a reasonable expectation of daylight and sunlight, need to be assessed.

7.2 From a review of the site and its surroundings, it has been established that the following neighbouring properties appear to provide residential accommodation and have therefore been considered within our analysis.



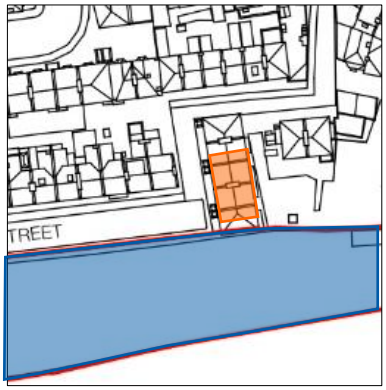
A	5, 6 & 7 Collins Street	B	14-29 Collins Street
C	John Ball Primary School	D	John Ball Nursery

8.0 Daylight and Sunlight Assessment of Neighbouring Properties

8.1 Following our interrogation of the neighbouring properties, the context of the site and the application of the criteria within the BRE guidelines, we have identified the following residential properties are required to be assessed within the daylight and sunlight analysis.

- 5, 6 and 7 Collins Street
- 14-29 Collins Street
- John Ball Primary School
- John Ball Nursery

8.2 5, 6 and 7 Collins Street



8.2.1 These properties are located to the north of the site, but with an east/west orientation. They provide residential accommodation over three floors.

8.2.2 The VSC results are set out in the table attached at Appendix C. These demonstrate that 14 of the 16 windows will achieve the numerical targets set out in the BRE guidelines, despite the urban context. The two windows that do not achieve the above are within a door, located beneath the main front and currently enjoy very limited access to natural light (<5% VSC) despite the underdeveloped nature of the site. As a result, any reduction will appear disproportionate. The room they serve will however retain good access to daylight as the main window achieves the guidelines and the room achieves the numerical target for daylight distribution.

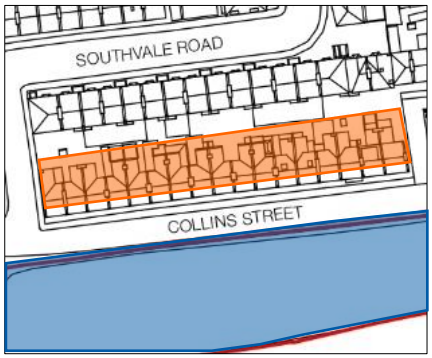
8.2.3 The assessment has also considered daylight distribution, with results set out in the table attached at Appendix C and demonstrate that all 11 rooms will achieve the numerical values set out in the BRE guidelines.

8.2.4 With regard to sunlight, due to the orientation of the properties facing within 10 degrees of due west access to sunlight is very restricted. If the property was facing due west, no analysis would be required.

8.2.5 The results of the analysis, as set out in the table attached to Appendix D of this report, demonstrate that all nine rooms analysed will achieve the annual sunlight numerical targets specified in the BRE guidelines. Regarding sunlight during the winter months, seven of the rooms will meet the numerical targets. For the two rooms that do not meet the BRE guidelines, one currently receives only 2% sunlight due to the underdeveloped nature of the site, and any new massing on the site will reduce this further. The second room will also achieve 2% sunlight, which is considered acceptable given the property's orientation, the underdeveloped site condition, and the surrounding urban context.

8.2.6 The results of the analysis demonstrate that, despite the urban location and orientation of the properties, will retain good access to daylight and sunlight and achieve the BRE guidelines.

8.3 14-29 Collins Street



8.3.1 These properties are located to the north of the site and consist of a terrace of residential properties providing accommodation over two floors. We have been unable to source any information that indicates the internal configuration of these properties and have therefore based our analysis on reasonable assumptions.

8.3.2 The results of the VSC analysis are set out in the table attached at Appendix C of this report.

8.3.3 The results of the VSC analysis demonstrate that of the 53 windows serving habitable rooms analysed, 36 (68%) will achieve the numerical values set out in the BRE guidelines. With regard to the remaining windows, as set out in paragraph 1.6 of the BRE guidelines, the recommendations need to be applied flexibly, which has been recognised by the Planning Inspector's decisions, (e.g. Woodlands Nursery Appeal ref: AP/5660/W/20/3248960), especially considering the urban location of the site. The results of the analysis also need to be considered with the two-stage approach as referenced in the High Court decision *Rainbird R v The Council of the London Borough of Tower Hamlets [2018] EWHC 657,* which as well as referencing the BRE guidelines advises that the location of the site and the retained levels need to be considered.

8.3.4 Taking into account the above, bearing in mind the underdeveloped nature of the site and the retained VSC in all instances is greater than 25%, it is considered that the analysis demonstrates that all the neighbouring properties will retain good access to daylight.

8.3.5 An assessment has also been undertaken to establish the daylight distribution within these properties, based on our assumptions as to their internal configuration and following online research. This analysis demonstrates that 30 of the 35 rooms (86%) will achieve the numerical target set out in the BRE guidelines, with the remaining achieving at least 74% of their area in front of the NSL which is considered appropriate for such a location.

8.2.6 The results of the sunlight analysis are set out in the table attached at Appendix D and demonstrate that all rooms with windows facing within 90˚ of due south, will achieve the numerical values set out in the BRE guidelines.

8.3.7 The results of the analysis therefore demonstrate that this property will retain good access to daylight and sunlight, taking into account the urban location and therefore achieve the BRE guidelines.

8.4 John Ball Primary School

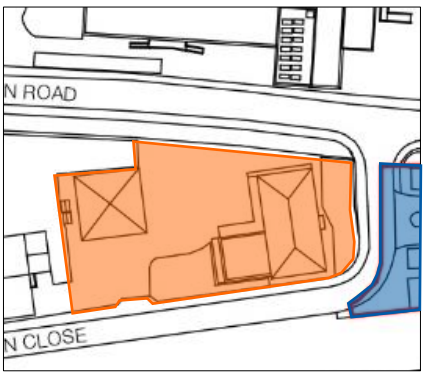
8.4.1 This property is located to the west of the site and provides educational accommodation at lower ground, ground and first floors. The internal configuration of this property has been based on plans obtained from the local authority's planning portal.

8.4.2 The results of the VSC analysis are set out in the table attached at Appendix C of this report. They demonstrate that 49 of the 50 windows (98%) will achieve the numerical values within the BRE guidelines. Regarding the one remaining window, this serves a room which is served by multiple other windows and therefore the room will retain good access to daylight.

8.4.3 An assessment has been undertaken to establish the daylight distribution within this property and demonstrates that all rooms will achieve the numerical targets set out in the BRE guidelines.

8.4.4 A sunlight analysis has been undertaken of the rooms that have windows facing within 90° of due south with the results set out in the table attached at Appendix D. These demonstrate that all windows will achieve the numerical targets set out in the BRE guidelines and therefore the proposals will not have a significant effect on sunlight.

8.5 John Ball Nursery



8.5.1 This property is located to the southwest of the site and provides educational accommodation on the ground and first floors. The internal configuration of this property has been based on plans obtained from the local authority's planning portal.

8.5.2 The results of the VSC analysis are set out in the table attached at Appendix C of this report. They demonstrate that all except 4 windows assessed will achieve the numerical values within the BRE guidelines, with the four that do not all serving rooms served by multiple other windows.

8.5.3 An assessment has been undertaken to establish the daylight distribution within this property and as set out in the table attached at Appendix C, all rooms will achieve the BRE guidelines.

8.5.4 A sunlight analysis has been undertaken of the rooms that have windows facing within 90° of due south, with the results set out in the table attached at Appendix C. These demonstrate that all will achieve the numerical targets set out in the BRE guidelines.

9.0 Daylight and Sunlight Assessment of Proposed Accommodation

9.1 The analysis has considered 126 habitable rooms, these being to Blocks A, B and C, where access to daylight and sunlight will be most restricted. The results of the daylight analysis are set out in the table attached at Appendix C of this report and demonstrate that all rooms assessed will achieve or exceed the target level of daylight set out in BS EN 17037 and referenced in the BRE guidelines.

9.2 An analysis has been undertaken to establish the level of sunlight the proposed accommodation within the scheme will enjoy, with the results set out in the table attached at Appendix D. The BRE guidelines acknowledge under paragraph 3.1.16 that where groups of dwellings are planned, it is not possible for all units to achieve the numerical targets in the BRE guidelines, but that the aim should be to maximise the number of units that do. The analysis demonstrates that as a result of careful consideration during the design process, 26 of the 27 units will have at least one room that enjoys 1.5 hours of direct sunlight on 21st March or more. This demonstrates that the BRE guidelines are achieved and will provide accommodation with good access to sunlight.

9.3 The analysis therefore demonstrates that taking into account the sites orientation, the proposed scheme will therefore provide accommodation with good access to sunlight and daylight.

10.0 Overshadowing Analysis

10.1 An analysis has been undertaken of the rear gardens of 5-7 Collins Street and playground to John Ball Primary School, to establish the level of sunlight that will be enjoyed by these areas on 21st March, as recommended within the BRE guidelines.

10.2 The results of the analysis as set out in the table attached at Appendix C of this report. They show that all areas except the garden to 7 Collins Street will achieve the numerical targets within the BRE guidelines based on a permanent shadow analysis.

10.3 With regards to the rear garden of 7 Collins Street, it should be appreciated that this is located to the west of the property and therefore the property itself casts a shadow over its garden for a significant portion of the day. In addition, the garden enjoys an exceptional level of sunlight for such an urban location due to the underdeveloped nature of the site and that should a structure of similar height to No7 already be erected on the site this would have the same effect as the proposals. In view of the above, in accordance with paragraph 3.3.13 we have undertaken a transient shadow analysis for the 21st March and 21st June in both the existing and proposed scenarios, as illustrated on drawing numbers 2676-20, 21, 22 and 23 attached at Appendix B of this report. These demonstrate that in June, when this area is more likely to be occupied, the proposals cast no shadow over the garden of No7.

10.4 Taking into account the urban location and underdeveloped nature of the site, it is considered that the results of the analysis demonstrates that the neighbouring amenity space will retain appropriate access to direct sunlight.

10,5 With regards to the proposed amenity space being located to the south or with an open aspect to the south, this will all enjoy good access to direct sunlight.

11.0 Conclusion

11.1 An assessment has been undertaken of the proposals for the site to establish whether there will be an impact on the daylight and sunlight enjoyed by the neighbouring properties and also whether the proposals will provide accommodation with access to acceptable levels of daylight and sunlight.

11.2 The results of the analysis have been considered with reference to the recommendations set out in the Building Research Establishment's publication "*Site layout planning for daylight and sunlight. A guide to good practice.*" (2022) (BRE guidelines).

11.3 It has been considered that the following properties that surround the site provide residential accommodation and therefore have formed part of our assessment.

- 5, 6 and 7 Collins Street
- 14-29 Collins Street
- John Ball Primary School
- John Ball Nursery

11.4 The results of the analysis of the implications the proposals will have on the neighbouring properties daylight demonstrates that 83% of windows analysed within the neighbouring properties will achieve the numerical targets within the BRE guidelines, despite the underdeveloped nature of the site and the urban setting. With regard to the remaining windows, 74% of these achieve a VSC of at least 25% which is well above the 16% to 18% considered appropriate within the Woodlands Nursery Appeal (Ref: APP/N5660/W/20/3248960).

11.5 With regards to the sunlight enjoyed by the neighbouring properties the analysis demonstrates that in all instances the numerical targets in the BRE guidelines are achieved with regards to annual sunlight and all except two will with regards to winter sunlight, this being primarily due to the orientation of the property concerned. The proposals will therefore not have a significant effect on the sunlight enjoyed by the neighbouring properties.

11.6 An assessment has been calculated of the levels of daylight and sunlight the proposed accommodation will enjoy.

11.7 The results of the daylight analysis of the proposed accommodation demonstrates that all will achieve or exceed the numerical values set out in the BRE guidelines, with reference to BS EN 17037.

11.8 Concerning the units access to sunlight, the analysis demonstrates that 26 of the 27 units analysed will achieve the numerical target in the BRE guidelines and that therefore in accordance with paragraph 3.1.16 the number of units achieving this has been maximised.

11.9 The analysis demonstrates that, taking into account the sites urban location, together with the provision of private amenity space, that the scheme in providing no north facing single aspect units, provides accommodation with good access to daylight and sunlight.

11.10 With regards to overshadowing, the analysis it is considered demonstrates that, taking into account the urban location and under developed nature of the site, the neighbours amenity space will retain appropriate access to sunlight and due to the orientation of the proposed amenity space, this will have good access to sunlight.

11.11 The results of the assessment undertaken demonstrates that through careful design and taking into account the urban location, the aims of the Building Research Establishment's publication "*Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice*" (2022) are achieved and that the proposals will not have a significant effect on the neighbour's daylight and sunlight and that accommodation with good access to daylight and sunlight within the scheme will be provided.

Appendix A

Principles of Daylight and Sunlight

In 2022 the Building Research Establishment (BRE) published a revision to their 2011 handbook titled "*Site Layout Planning for Daylight and Sunlight. A guide to good practice.*" The handbook provides advice on how to achieve good daylight and sunlight both within buildings and to open spaces during site layout planning.

The BRE guidelines are used by most local planning authorities when considering the impact on daylight and sunlight. The guidelines are purely advisory and should be applied flexibly to the individual circumstances of each site. The guidelines are more suited to low density suburban development sites where there is greater flexibility for site layout planning. Where sites are located in dense urban locations, there are often constraints from adjacent buildings and in these instances, the guidelines state that the criteria should be applied more flexibly. In paragraph 1.6 of the introduction of the BRE guidelines, it states:

The guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design. In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings.

Assessment of Daylight to Neighbours

Set out in the BRE guidelines is the methodology for assessing daylight within existing buildings. It states that it is important for a new development or extension to '*safeguard the daylight to nearby buildings*'.

The guidelines advise that daylight should be assessed to habitable rooms within adjoining dwellings. It states that daylight is required to living rooms, kitchens and bedrooms.

The first assessment that should be undertaken is to establish whether the proposals will subtend an angle of 25^{0} from the centre of the window. The guidelines state that if the angle is less than 25^{o}, then the development is not likely to affect the daylight to this window. If however the angle is greater than 25^{0}, the guidelines advise:

If, for any part of the new development, this angle is more than 25^{0}, a more detailed check is needed to find the loss of skylight to the existing development.

This assessment is more appropriate for well-spaced, low density or low rise, uniform proposed developments. It is not an appropriate assessment for dense urban environments where the existing building on the development site already subtends at an angle greater than 25^{0} to the horizontal from the subject window. It is for this reason that the 25^{0} assessment is generally dispensed with and the more detailed analysis outlined below is undertaken.

The BRE guidelines advise on two methodologies for calculating daylight. These are a Vertical Sky Component (VSC) and a No Sky Line (NSL) analysis.

Vertical Sky Component

A Vertical Sky Component (VSC) analysis establishes the amount of available daylight received directly from the sky for each individual window. The reference point for the analysis is the centre of the window, on the plane of the outer window wall.

The VSC is the amount of direct sky a window enjoys expressed as a percentage of the amount of direct sky a horizontal, unobstructed rooflight would receive.

The maximum percentage of direct skylight a vertical window can receive is 40%. The BRE have determined that where a VSC of 27% is achieved, then daylight should reach the window of an existing building. Where a VSC of less than 27% is achieved either before or after the implementation of the proposals, then the BRE guidelines state that provided the new value is greater than 0.8 times the existing value, daylight will not be significantly affected.

No Sky Line

A No Sky Line (NSL) analysis is undertaken to establish the daylight distribution with a room. The assessment is undertaken at working plane level with this set at 0.85m above the floor level of a dwelling.

The BRE guidelines recommend that provided a significant area of the room, which is considered to be 80%, is infront of the NSL (the point behind which at desk top level no sky is visible) or at least 0.8 times the existing area, then the room will enjoy good daylight distribution.

If, in the existing situation this is not the case, the BRE guidelines advise that provided the area following the implementation of the proposals is at least 0.8 times the existing area, there will not be a significant affect.

The BRE guidelines advise that there are scenarios when daylight calculations maybe impacted by the design of an existing building. This may be due to balconies located above existing windows or the neighbouring property is located tight against the site boundary and therefore is taking more than its fair share of light.

Assessment of Sunlight to Neighbours

A sunlight analysis is undertaken using a similar method to a VSC assessment. The BRE guidelines advise that all living rooms within 90^{0} of due south should be analysed. It states that kitchens and bedrooms are considered to be less important, but sunlight to these rooms should not be blocked too much.

Within commercial or non-domestic buildings, the use of the building will determine whether a sunlight assessment is required.

In relation to neighbouring residential buildings, if a window is facing within 90^{0} of due south and overlooking any part of the proposals that subtend an angle of more than 25^{0} to the horizontal, measured from the centre of the window in a vertical section perpendicular to the window, then the sunlight of the existing dwelling may be affected.

To assess the level of impact on sunlight to neighbouring properties, an Annual Probable Sunlight Hours (APSH) analysis should be undertaken. The BRE guidelines advise that an assessment should be carried out to all windows within 90^{0} of due south. These windows should achieve 25% APSH with at least 5% being achieved during the winter months.

Where this is not achieved, if the difference between the existing and proposed APSH is more than 4%, then the BRE guidelines state that the proposals will not have a noticeable effect on sunlight, provided the total APSH, as well as during the winter months, are within 0.8 times the existing.

Assessing Proposed Accommodation

Daylight

When considering the level of daylight that will be enjoyed by the proposed residential accommodation within a development, the BRE guidelines makes reference to the recommendations within the British Standard BS EN17037 "Daylight in Buildings".

BS EN 17037 advises that a room should receive at least 50% of the recommended lux level for at least half of the annual daylight hours. Below are the ideal lux levels, depending on room use.

- Bedroom 100
- Living Room 150
- Kitchen 200

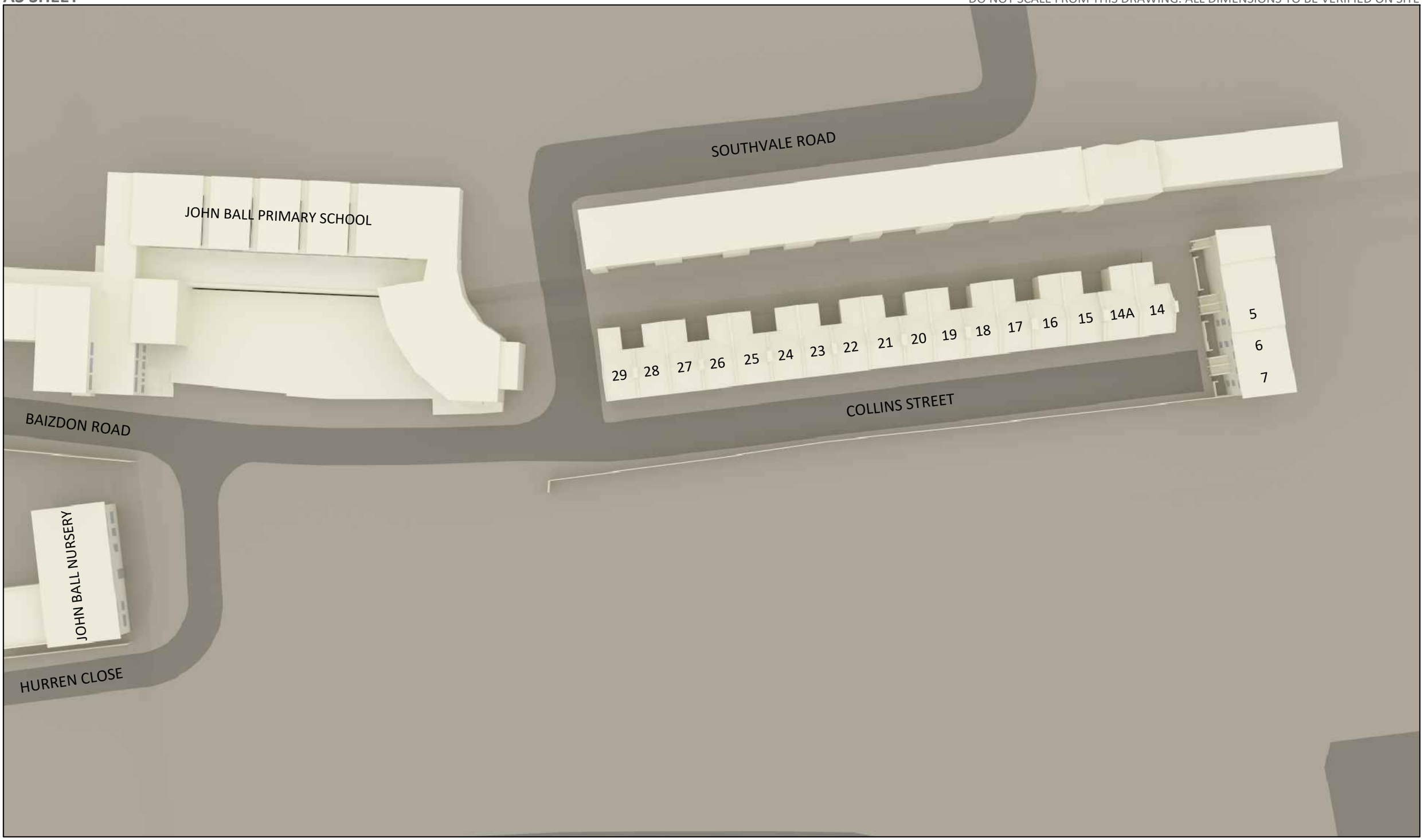
Sunlight

As with the daylight assessment, the BRE guidelines make reference to BS EN17037. It advises that the principal habitable rooms that have a window facing within 90^0 of due south should be assessed. The criteria advises that at least 1.5 hours of sunlight are enjoyed.

Appendix B

A3 SHEET

DO NOT SCALE FROM THIS DRAWING. ALL DIMENSIONS TO BE VERIFIED ON SITE



CAD SOURCES

REV	DESCRIPTION	DATE	INIT	CHKD
A	7 Collins Street added to surrounding buildings analysed.	07.11.2024	CO	JC

N

Legend

Surrounding Buildings

Project
Blackheath Station Car Park, Lewisham, SE3 9LE
Title
Existing Site Plan

Scale	Date	Drawn By	Checked By	Project No:	Drawing No:	Revision
NTS	06.09.2024	CO	JC	2676 -	001	A

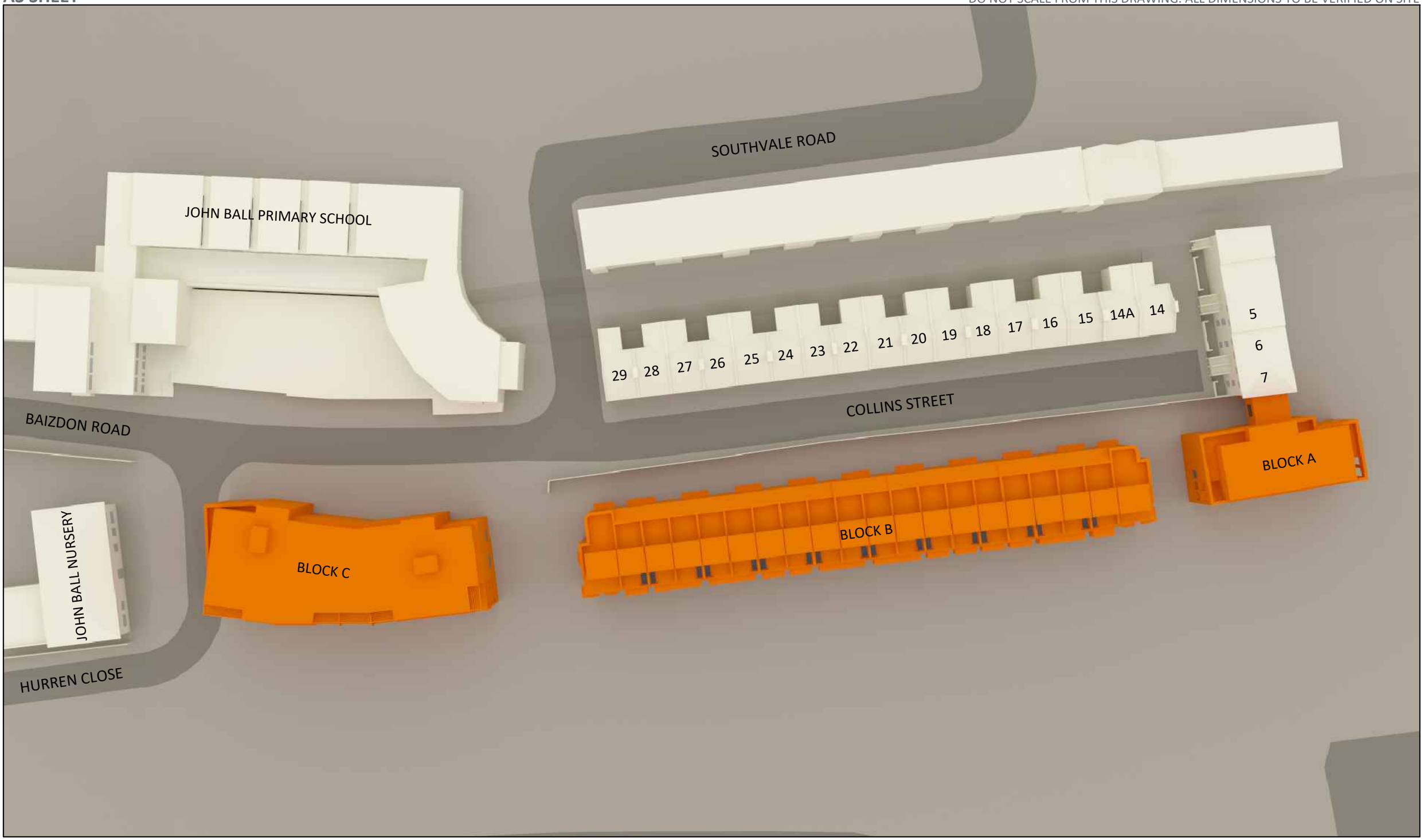
2-6 Boundary Row London SE1 8HP
020 3714 4090 enquiries@chpsurveyors.com
CHP Surveyors Ltd is a Limited Liability Company Registered in England & Wales number 07060507

www.chpsurveyors.com

CHP Surveyors

A3 SHEET

DO NOT SCALE FROM THIS DRAWING. ALL DIMENSIONS TO BE VERIFIED ON SITE



CAD SOURCES

REV	DESCRIPTION	DATE	INIT	CHKD
A	7 Collins Street added to surrounding buildings analysed.	07.11.2024	CO	JC

N

Legend

Surrounding Buildings

Proposal

Project

Blackheath Station Car Park, Lewisham, SE3 9LE

Title

Proposed Site Plan

Scale	Date	Drawn By	Checked By	Project No:	Drawing No:	Revision
NTS	06.09.2024	CO	JC	2676 -	002	A

2-6 Boundary Row London SE1 8HP

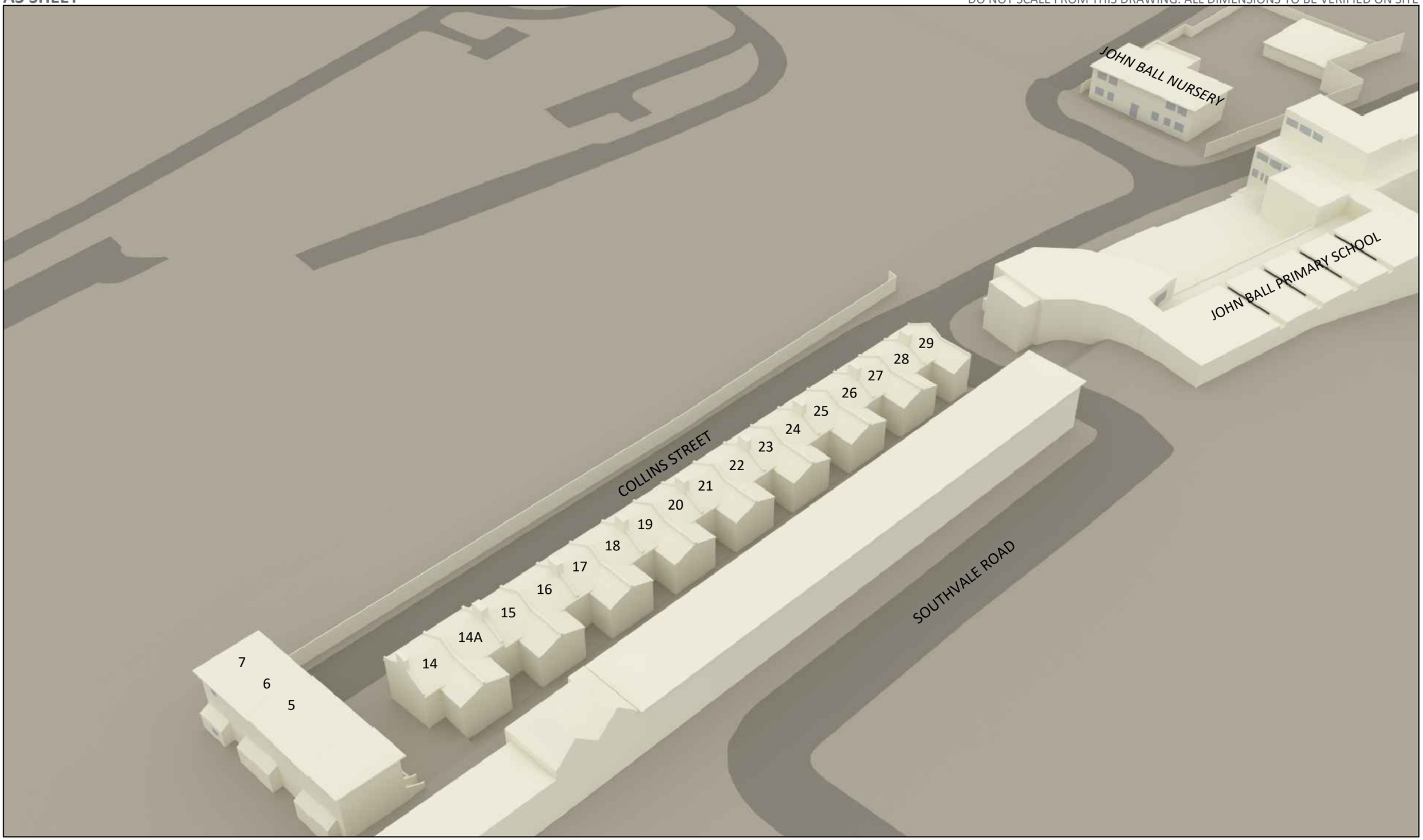
020 3714 4090 enquiries@chpsurveyors.com

www.chpsurveyors.com

CHP Surveyors

A3 SHEET

DO NOT SCALE FROM THIS DRAWING. ALL DIMENSIONS TO BE VERIFIED ON SITE



CAD SOURCES

Legend

Surrounding Buildings

REV	DESCRIPTION	DATE	INIT	CHKD
A	7 Collins Street added to surrounding buildings analysed.	07.11.2024	CO	JC

Project
Blackheath Station Car Park, Lewisham, SE3 9LE
Title
Existing 3D View from Northeast

Scale	Date	Drawn By	Checked By	Project No:	Drawing No:	Revision
NTS	06.09.2024	CO	JC	2676 -	003	A

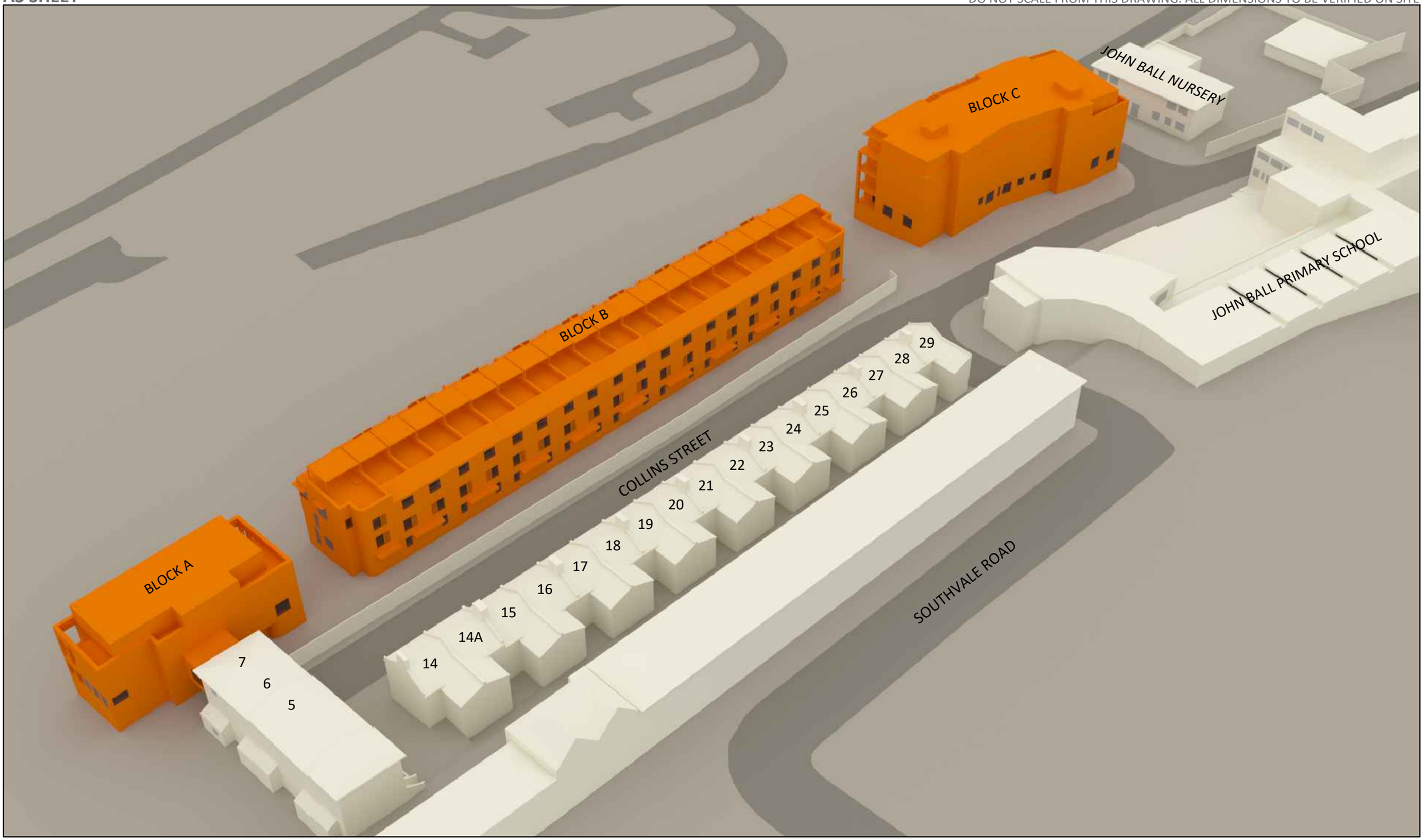
2-6 Boundary Row London SE1 8HP
020 3714 4090 enquiries@chpsurveyors.com

www.chpsurveyors.com

CHP Surveyors

A3 SHEET

DO NOT SCALE FROM THIS DRAWING. ALL DIMENSIONS TO BE VERIFIED ON SITE



CAD SOURCES

REV	DESCRIPTION	DATE	INIT	CHKD
A	7 Collins Street added to surrounding buildings analysed.	07.11.2024	CO	JC

Legend

Surrounding Buildings

Proposal

Project
Blackheath Station Car Park, Lewisham, SE3 9LE

Title
Proposed 3D View from Northeast

Scale	Date	Drawn By	Checked By	Project No:	Drawing No:	Revision
NTS	06.09.2024	CO	JC	2676 -	004	A

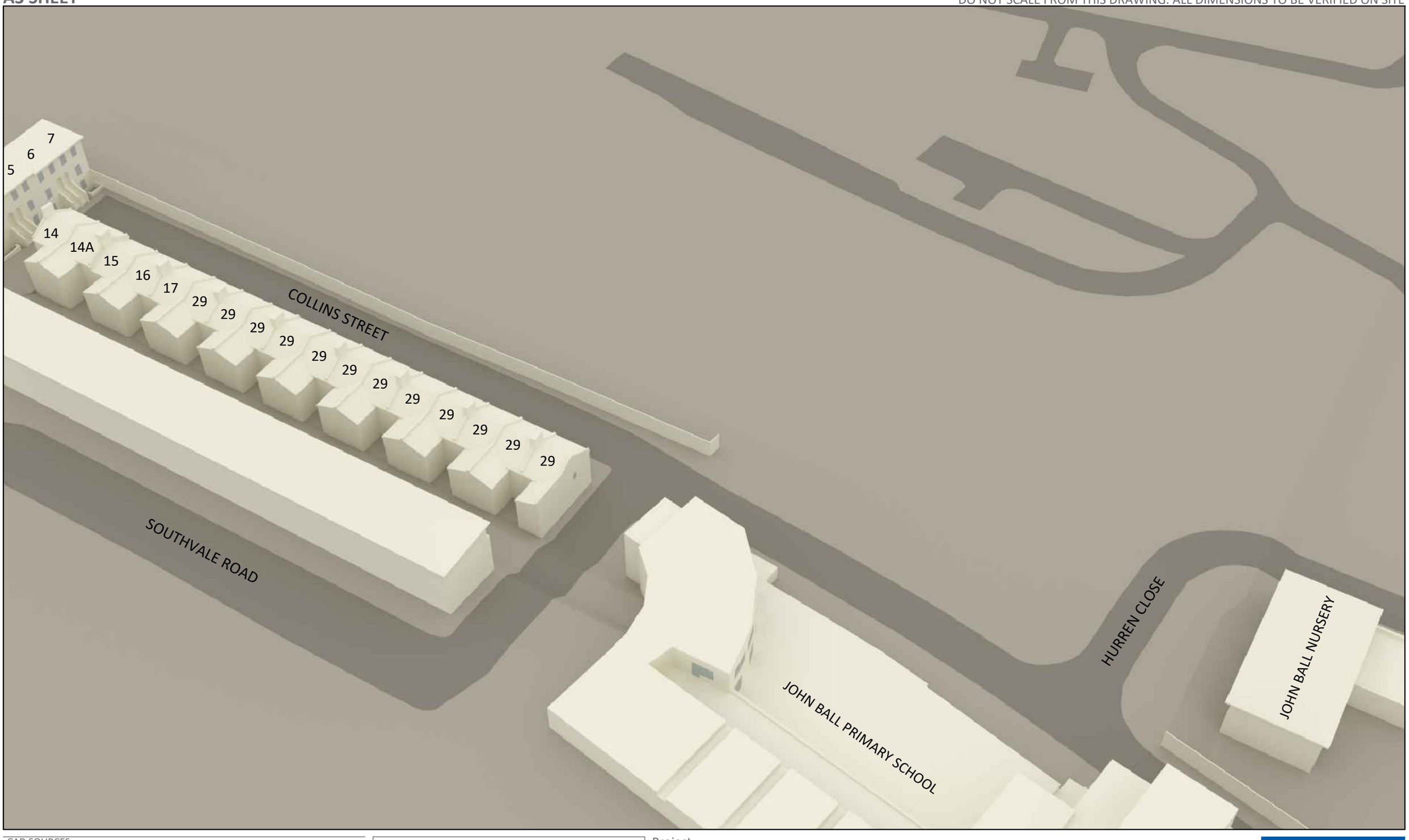
2-6 Boundary Row London SE1 8HP
020 3714 4090 enquiries@chpsurveyors.com
CHP Surveyors Ltd is a Limited Liability Company Registered in England & Wales number 07060507

www.chpsurveyors.com

CHP Surveyors

A3 SHEET

DO NOT SCALE FROM THIS DRAWING. ALL DIMENSIONS TO BE VERIFIED ON SITE



CAD SOURCES

Legend

Surrounding Buildings

REV	DESCRIPTION	DATE	INIT	CHKD
A	7 Collins Street added to surrounding buildings analysed.	07.11.2024	CO	JC

Project
Blackheath Station Car Park, Lewisham, SE3 9LE
Title
Existing 3D View from Northwest

Scale	Date	Drawn By	Checked By	Project No:	Drawing No:	Revision
NTS	06.09.2024	CO	JC	2676 -	005	A

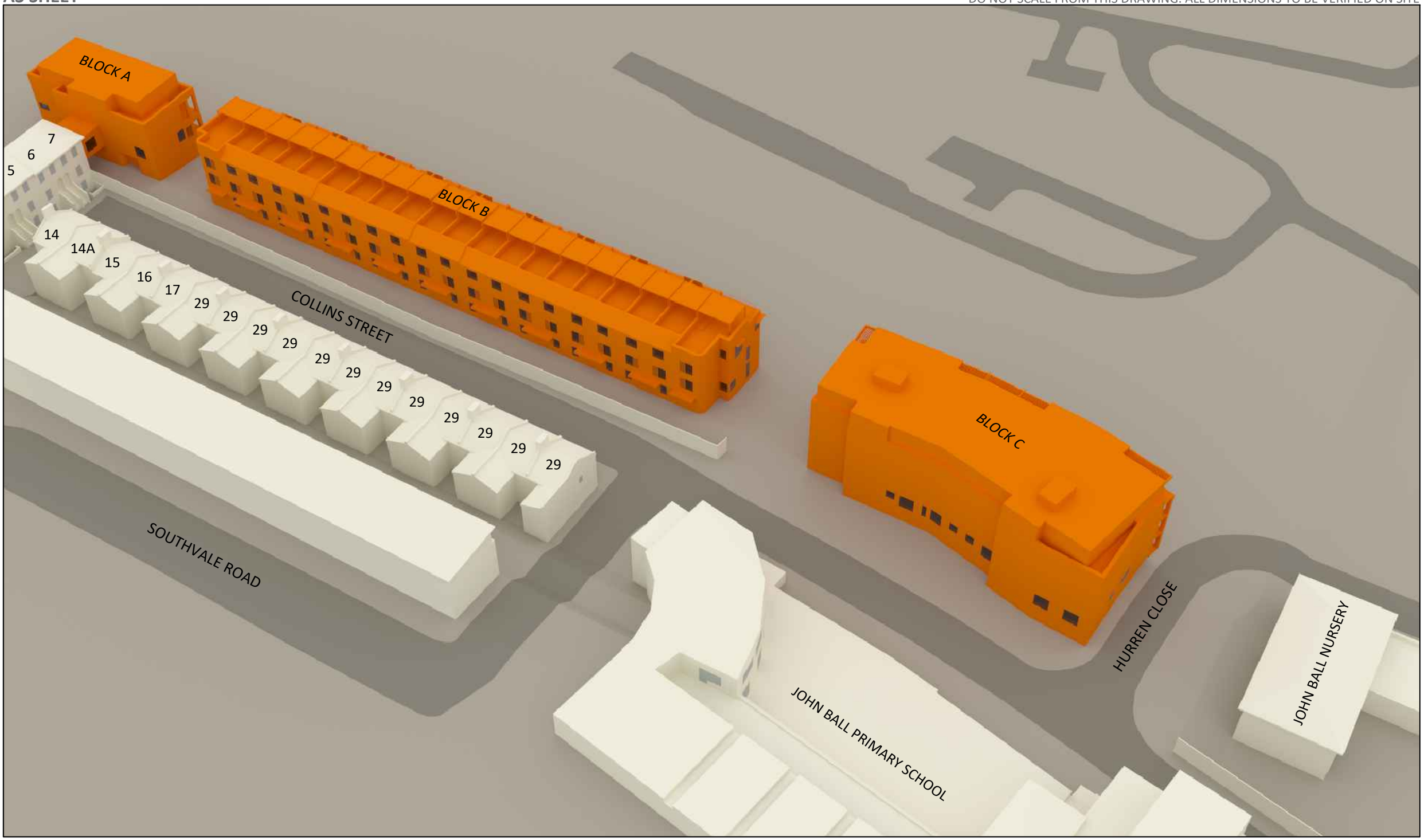
2-6 Boundary Row London SE1 8HP
020 3714 4090 enquiries@chpsurveyors.com
CHP Surveyors Ltd is a Limited Liability Company Registered in England & Wales number 07060507

www.chpsurveyors.com

CHP Surveyors

A3 SHEET

DO NOT SCALE FROM THIS DRAWING. ALL DIMENSIONS TO BE VERIFIED ON SITE



CAD SOURCES

REV	DESCRIPTION	DATE	INIT	CHKD
A	7 Collins Street added to surrounding buildings analysed.	07.11.2024	CO	JC

Legend

- Surrounding Buildings
- Proposal

Project
Blackheath Station Car Park, Lewisham, SE3 9LE

Title
Proposed 3D View from Northwest

Scale	Date	Drawn By	Checked By	Project No:	Drawing No:	Revision
NTS	06.09.2024	CO	JC	2676 -	006	A

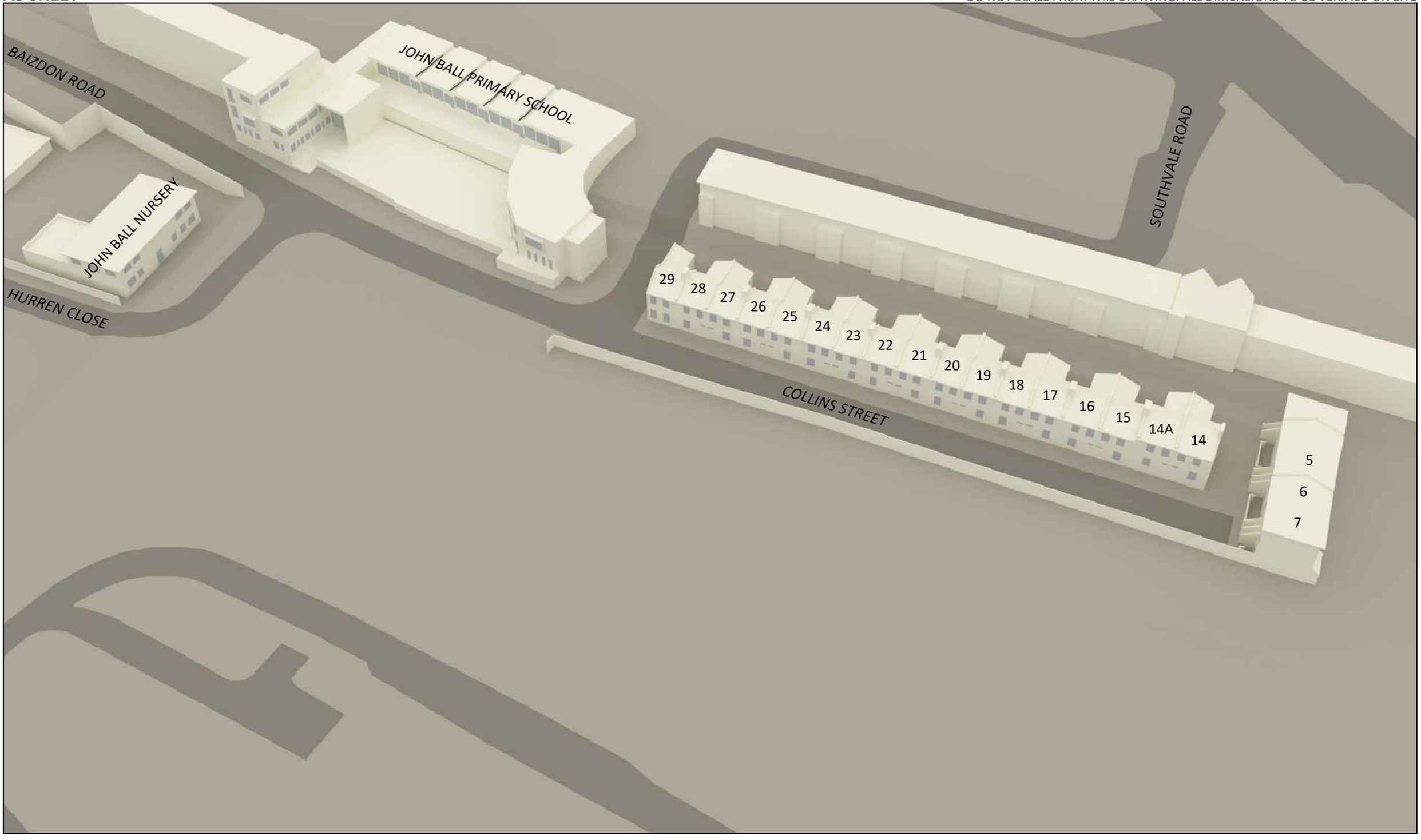
2-6 Boundary Row London SE1 8HP
020 3714 4090 enquiries@chpsurveyors.com

www.chpsurveyors.com

CHP Surveyors

A3 SHEET

DO NOT SCALE FROM THIS DRAWING. ALL DIMENSIONS TO BE VERIFIED ON SITE



CAD SOURCES

Legend

Surrounding Buildings

REV	DESCRIPTION	DATE	INIT	CHKD
A	7 Collins Street added to surrounding buildings analysed.	07.11.2024	CO	JC

Project
Blackheath Station Car Park, Lewisham, SE3 9LE
Title
Existing 3D View from Southeast

Scale	Date	Drawn By	Checked By	Project No:	Drawing No:	Revision
NTS	06.09.2024	CO	JC	2676 -	007	A

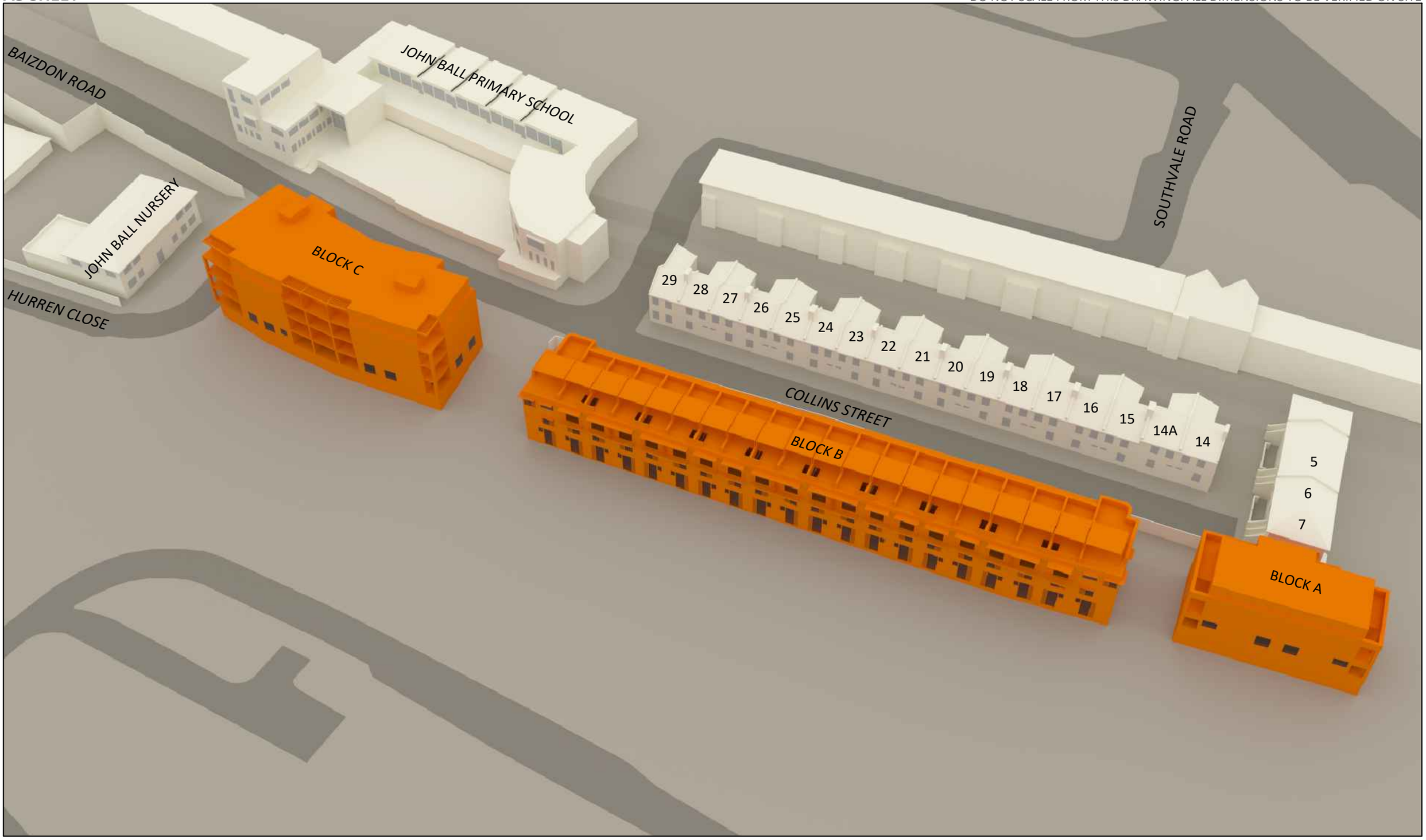
2-6 Boundary Row London SE1 8HP
020 3714 4090 enquiries@chpsurveyors.com
CHP Surveyors Ltd is a Limited Liability Company Registered in England & Wales number 07060507

www.chpsurveyors.com

CHP Surveyors

A3 SHEET

DO NOT SCALE FROM THIS DRAWING. ALL DIMENSIONS TO BE VERIFIED ON SITE



CAD SOURCES

REV	DESCRIPTION	DATE	INIT	CHKD
A	7 Collins Street added to surrounding buildings analysed.	07.11.2024	CO	JC

Legend

Surrounding Buildings

Proposal

Project
Blackheath Station Car Park, Lewisham, SE3 9LE
Title
Proposed 3D View from Southeast

Scale	Date	Drawn By	Checked By	Project No:	Drawing No:	Revision
NTS	06.09.2024	CO	JC	2676 -	008	A

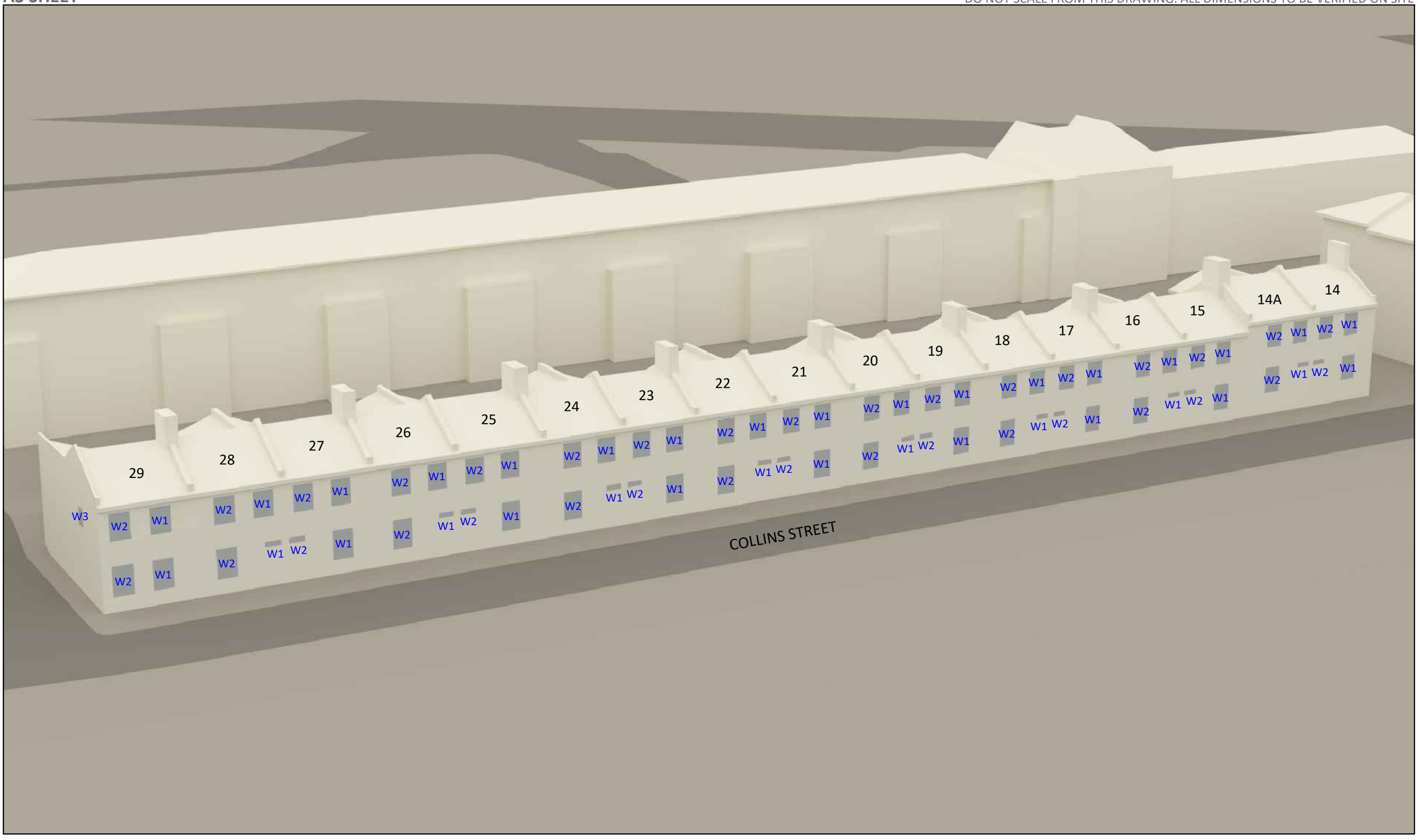
2-6 Boundary Row London SE1 8HP
020 3714 4090 enquiries@chpsurveyors.com
CHP Surveyors Ltd is a Limited Liability Company Registered in England & Wales number 07060507

www.chpsurveyors.com

CHP Surveyors

A3 SHEET

DO NOT SCALE FROM THIS DRAWING. ALL DIMENSIONS TO BE VERIFIED ON SITE



CAD SOURCES

REV	DESCRIPTION	DATE	INIT	CHKD

Legend

Surrounding Buildings

Project
Blackheath Station Car Park, Lewisham, SE3 9LE

Title
Window Map - 14-29 Collins Street (View from Southwest)

Scale	Date	Drawn By	Checked By	Project No:	Drawing No:	Revision
NTS	06.09.2024	CO	JC	2676 -	009	

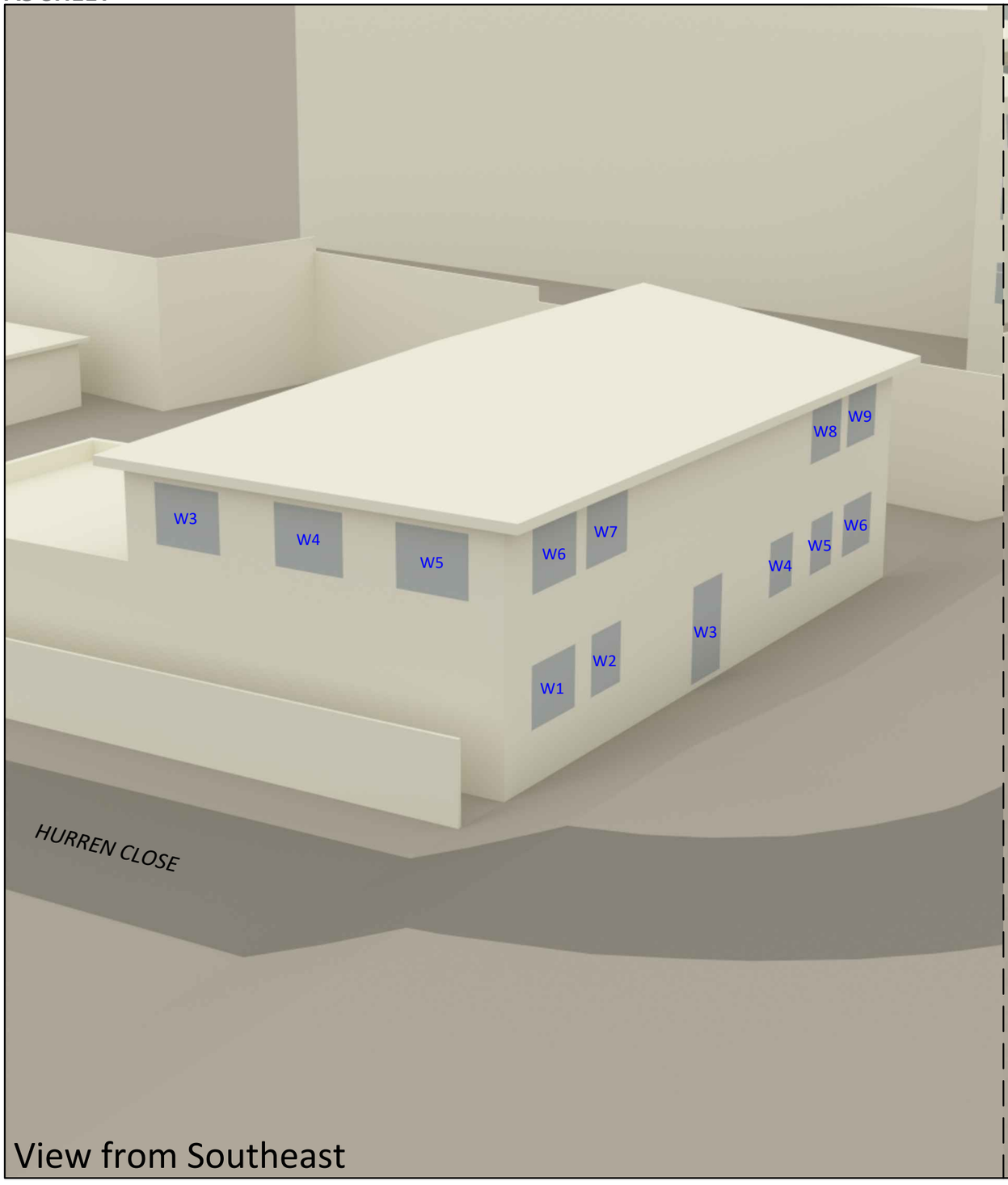
2-6 Boundary Row London SE1 8HP
020 3714 4090 enquiries@chpsurveyors.com

www.chpsurveyors.com

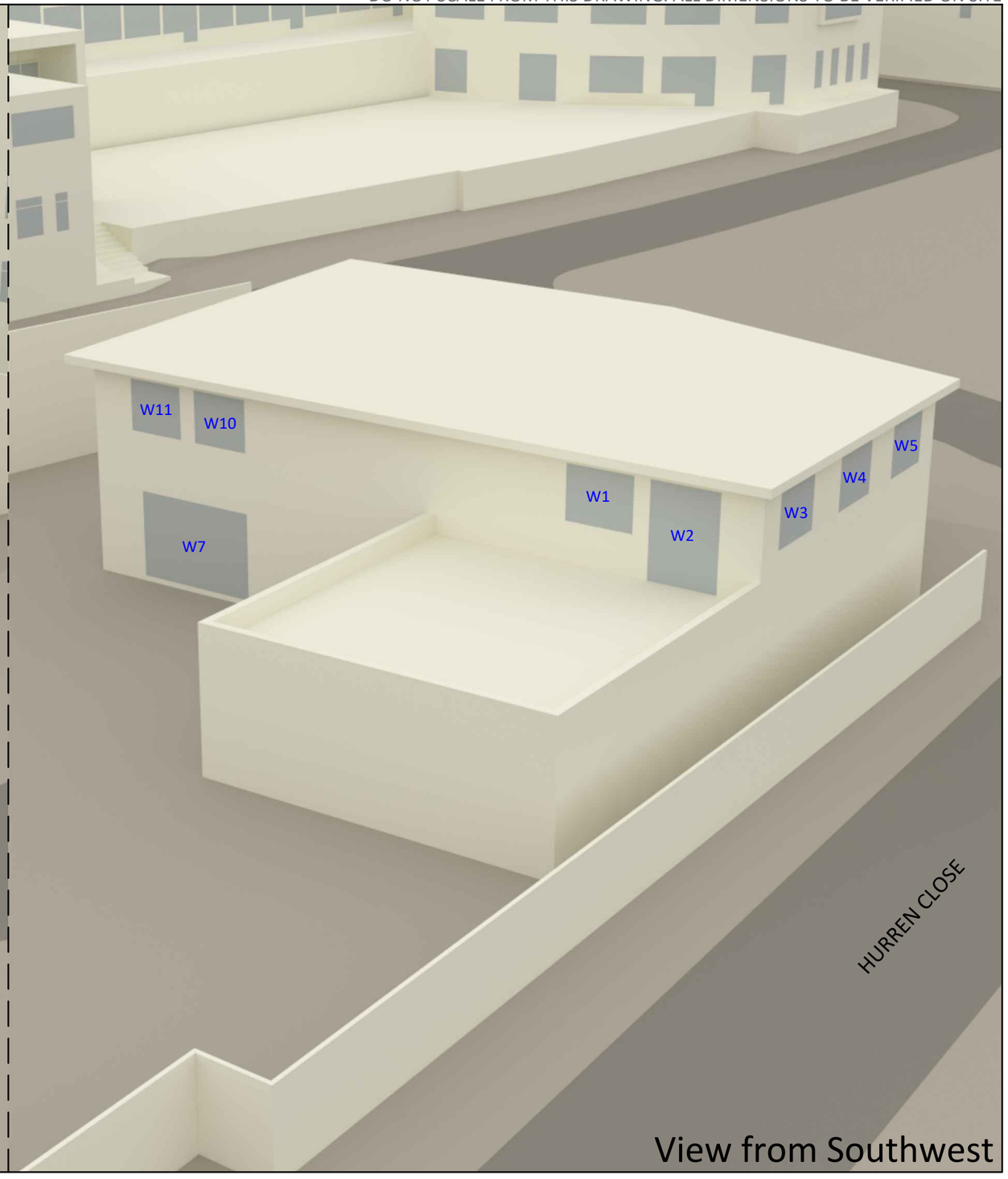
CHP Surveyors

A3 SHEET

DO NOT SCALE FROM THIS DRAWING. ALL DIMENSIONS TO BE VERIFIED ON SITE



View from Southeast



View from Southwest

CAD SOURCES

REV	DESCRIPTION	DATE	INIT	CHKD

Legend

Surrounding Buildings

Project
Blackheath Station Car Park, Lewisham, SE3 9LE
Title
Window Map - John Ball Nursery

Scale	Date	Drawn By	Checked By	Project No:	Drawing No:	Revision
NTS	06.09.2024	CO	JC	2676 -	010	

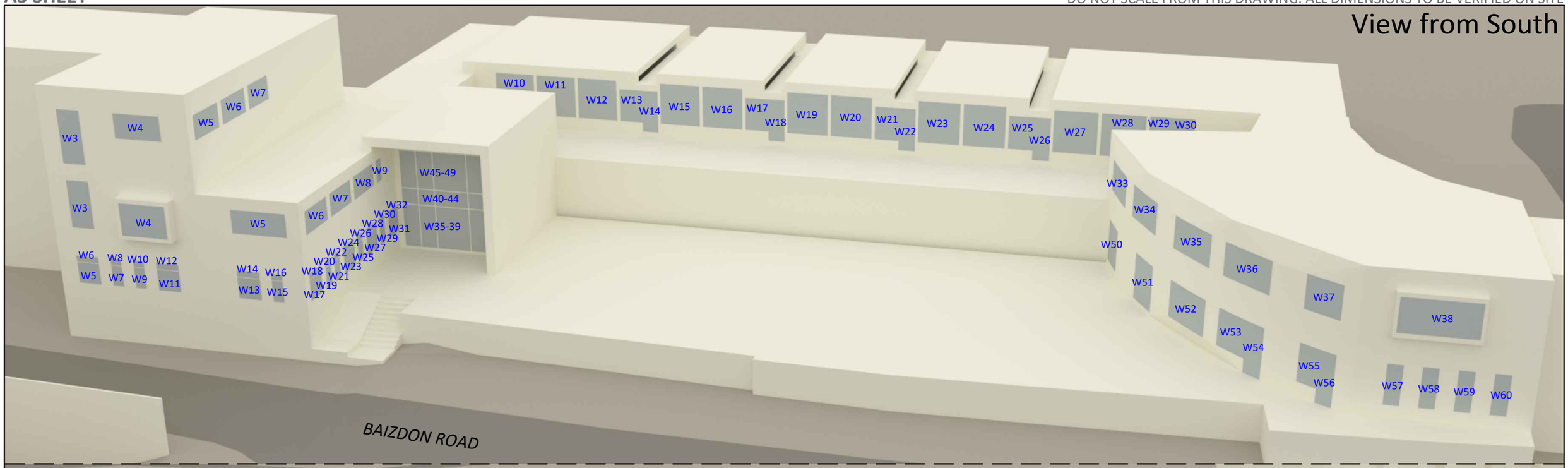
2-6 Boundary Row London SE1 8HP
020 3714 4090 enquiries@chpsurveyors.com

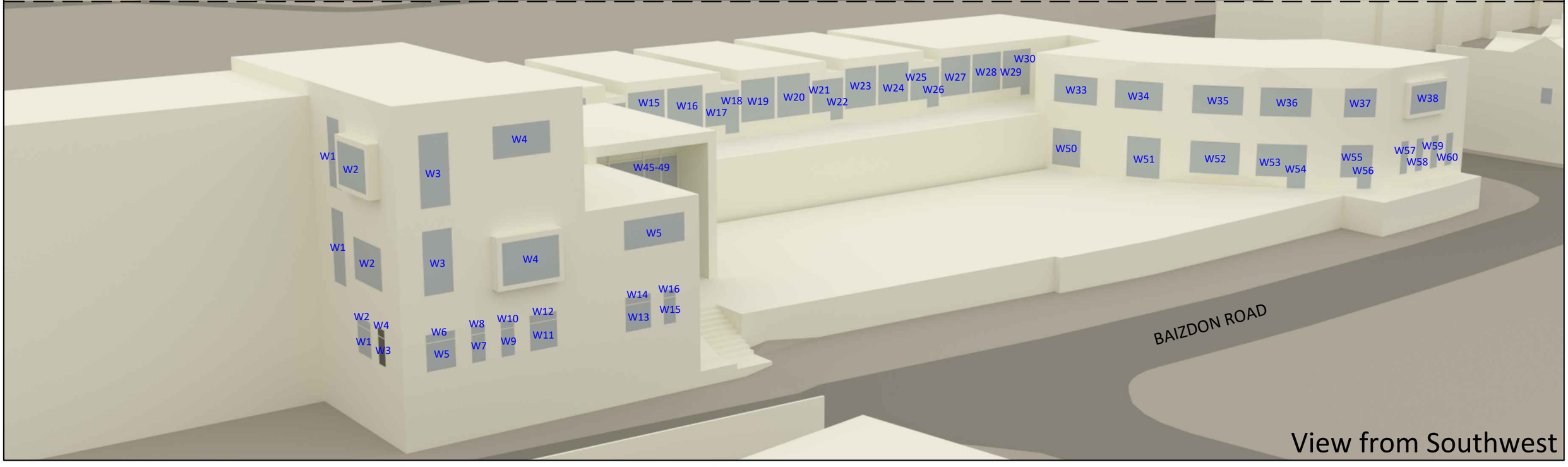
www.chpsurveyors.com

CHP Surveyors

A3 SHEET

DO NOT SCALE FROM THIS DRAWING. ALL DIMENSIONS TO BE VERIFIED ON SITE





CAD SOURCES

REV	DESCRIPTION	DATE	INIT	CHKD

Legend

Surrounding Buildings

Project
Blackheath Station Car Park, Lewisham, SE3 9LE

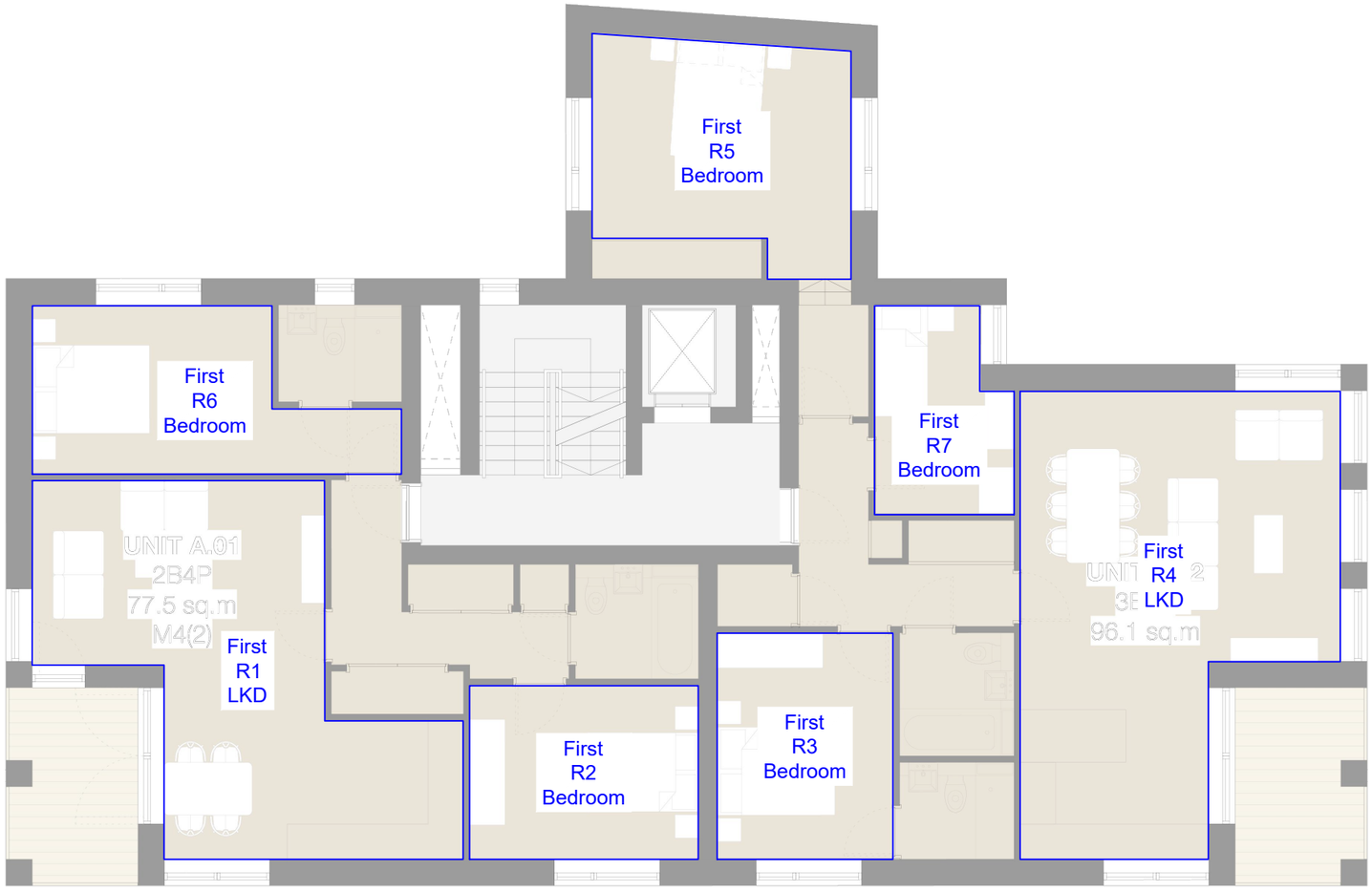
Title
Window Map - John Ball Primary School

Scale	Date	Drawn By	Checked By	Project No:	Drawing No:	Revision
NTS	06.09.2024	CO	JC	2676 -	011	

2-6 Boundary Row London SE1 8HP
020 3714 4090 enquiries@chpsurveyors.com

www.chpsurveyors.com

CHP Surveyors



CAD SOURCES

REV	DESCRIPTION	DATE	INIT	CHKD

N

Project
Blackheath Station Car Park, Lewisham, SE3 9LE
Title
Proposed Block A First Floor - Room Map

Scale	Date	Drawn By	Checked By	Project No:	Drawing No:	Revision
NTS	06.09.2024	CO	JC	2676 -	012	

2-6 Boundary Row London SE1 8HP
020 3714 4090 enquiries@chpsurveyors.com
CHP Surveyors Ltd is a Limited Liability Company Registered in England & Wales number 07060507

www.chpsurveyors.com