

FORMER HAMPSTEAD POLICE STATION, ROSSLYN HILL, LONDON, NW3 1PD

Daylight and Sunlight Effects Report (Neighbouring Properties)

December 2023

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APPENDICES

- Appendix 1 Assessment methodology and glossary
- Appendix 2 Location drawings
- Appendix 3 Daylight and sunlight results for neighbouring buildings

1. Introduction

- 1.1. Delva Patman Redler LLP have been engaged by the Applicant to assess the potential effects of the proposed development at The Former Hampstead Police Station ("the Site") on daylight and sunlight to neighbouring properties. This report has been prepared to accompany the Applicant's planning application.
- 1.2. The Site is shown outlined in red in the aerial photograph in Figure 1 below and on the location plan in Appendix 2.



Figure 1 - Aerial photo of the Site and neighbouring buildings (© Google)

- 1.3. The Site is located within The London Borough of Camden.
- 1.4. The proposed development and surrounding context is replicated in our 3D computer analysis model shown in the plan and 3D view drawings in Appendix 2.
- 1.5. The development comprises the change of use to commercial at lower ground, ground and part first floor alongside the change of use to residential at first and second floors. Refurbishment and various configurations of internal spaces and extensions at lower ground, ground, first and second floors at the east wing.
- 1.6. Our daylight and sunlight study has been carried out using the assessment methodologies recommended in 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (BR209, 2022 edition) published by the Building Research Establishment and the Professional Guidance Note, 'Daylighting and sunlighting' (1st edition, 2012), published by the Royal Institution of Chartered Surveyors.

1.7. This report is accompanied by the Appendices listed on the Contents page, including an explanation of the BRE assessment methodologies, a glossary of technical terms, drawings, and tabulated results.

2. Planning policy and guidance

National Planning Policy and Guidance

National Planning Policy Framework (September 2023)

- 2.1. The National Planning Policy Framework (NPPF) sets out the Government's planning policies and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. It places an emphasis on sustainable development and delivery of housing.
- 2.2. Chapter 11 of the NPPF, entitled *"Making effective use of land"*, promotes the effective use of land in meeting the need for homes and other uses. It gives examples such as developing under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively, and upward extensions to create new homes, where they would be consistent with the prevailing height and form of neighbouring properties and the overall street scene.
- 2.3. In particular, paragraph 125 of the NPPF states:

Area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, 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 acceptable living standards).

National Design Guide (January 2021)

- 2.4. The National Design Guide is part of a suite of planning practice guidance that supports the NPPF. The National Design Guide outlines the Government's priorities for well-designed places.
- 2.5. Paragraph 71 of the guidance dealing with built form states:

Proposals for tall buildings (and other buildings with a significantly larger scale or bulk than their surroundings) require special consideration. This includes their location and siting; relationship to context; impact on local character, views and sight lines; composition - how they meet the ground and the sky; and environmental impacts, such as sunlight, daylight, overshadowing and wind. These need to be resolved satisfactorily in relation to the context and local character.

2.6. Paragraphs 126 and 130 of the guidance dealing with homes and buildings state:

Well-designed homes and communal areas within buildings provide a good standard and quality of internal space. This includes room sizes, floor-to-ceiling heights, internal and external storage, sunlight, daylight and ventilation. The quality of internal space needs careful consideration in higher density developments, particularly for family accommodation, where access, privacy, daylight and external amenity space are also important.

Well-designed private or shared external spaces are fit for purpose and incorporate planting wherever possible. The appropriate size, shape and position for an external amenity space can be defined by considering:

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- how the associated building sits in the wider context, including access to public and open spaces;
- how the amenity space will be used, what for, and by whom;
- environmental factors that may affect its usability, such as sunlight and shade, noise or pollution;
- wider environmental factors affecting its quality or sustainability, such as a green corridor or drainage.

National Model Design Code (June 2021)

2.7. The National Model Design Code provides detailed guidance on the production of design codes, guides and policies to promote successful design.

2.8. Paragraphs 114 to 117 of section B.2. dealing with built form states:

Building height may also have an impact on local environmental conditions in neighbouring properties, amenity spaces and public spaces in terms of daylight, sunlight, overshadowing, wind and micro-climate. The placing of tall buildings needs to maximise user comfort of spaces between buildings by taking into account their impact on orientation and overshadowing of public and private spaces, quality of external spaces at ground level, wind tunnel effect, noise pollution and enable safe dispersion of pollutants.

Tall buildings can be considered in design codes. It may be appropriate to include criteria for the locations of tall buildings in some area types.... Tools that can assist with this include ... characterisation studies and design strategies, dealing with issues such as urban form, historic character, building typologies, prevailing sunlight and daylight levels, green infrastructure, amenity space and quality of external spaces at ground level.

2.9. Paragraph 188 of section H.2 dealing with health and wellbeing states:

The built environment has a significant impact on people's health and wellbeing. This relates across the design code with regard to walkable neighbourhoods, access to greenery and recreation, attractive buildings and public spaces, space standards, and strong communities. There are also specific elements relating to the impact of the design of homes and buildings that affect wellbeing including daylight, aspect and privacy, noise mitigation, security and access to private outdoor space.

Good quality housing creates a pleasant indoor environment with adequate levels of natural lighting, and sunlight, without problems of overheating, good quality ventilation, privacy from overlooking and minimal noise impact.

BRE Report 209, 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (2022)

- 2.10. The leading publication providing national guidance on the provision of daylight and sunlight to new development, and the impacts of development on daylight and sunlight to neighbouring buildings and open spaces, is BRE Report 209, '*Site Layout Planning for Daylight and Sunlight: A guide to good practice*' (third edition, 2022). It is referred to in the development plan documents or supplementary planning documents of most planning authorities. This guide supersedes the 2011 edition, which is now withdrawn.
- 2.11. The BRE guide states:

<u>Summary</u>

This guide gives advice on site layout planning to achieve good sunlighting and daylighting, both within buildings and in the open spaces between them. It is intended to be used in conjunction with the interior daylight recommendations for new buildings in the British Standard, 'Daylight in buildings', BS EN 17037. It contains guidance on site layout to provide good natural lighting within a new development; safeguarding of daylight and

sunlight within existing buildings nearby; and the protection of daylighting of adjoining land for future development. ... It is purely advisory and the numerical target values within it may be varied to meet the needs of the development and its location...

Introduction

(Its) main aim is ... to help to ensure good conditions in the local environment considered broadly, with enough sunlight and daylight on or between the buildings for good interior and exterior conditions.

This guide is intended for building designers and their clients, consultants and planning officials. The advice given 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 the 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... The calculation methods ... are entirely flexible in this respect...

Regional planning policy and guidance

The London Plan (March 2021)

- 2.12. The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. Its policies should inform decisions on planning applications across the capital.
- 2.13. The Plan notes that if London is to meet the challenges of the future, all parts of London will need to embrace and manage change. In many places, change will occur incrementally, especially in outer London, where the suburban pattern of development has significant potential for appropriate intensification over time, particularly for additional housing. The areas that will see the most significant change are identified as Opportunity Areas, many of which are already seeing significant development. London's Central Activities Zone (CAZ) and town centre network have a crucial role to play in supporting London's growth.

Policy GG2 'Making the best use of land'

2.14. Policy GG2 states:

To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must:

- B prioritise sites which are well-connected by existing or planned public transport
- *C* proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling
- D applying a design–led approach to determine the optimum development capacity of sites

Policy D3 'Optimising site capacity through the design-led approach'

2.15. Policy D3 states:

A All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site... B Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling...

Policy D6 'Housing quality and standards'

2.16. Policy D6 states:

- C Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 'Optimising site capacity through the design-led approach' than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- 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.
- 2.17. The supporting text notes that dual aspect dwellings with opening windows on at least two sides have many inherent benefits, including better daylight, a greater chance of direct sunlight for longer periods, natural cross-ventilation, etc. It notes that the design of single aspect dwellings must demonstrate that all habitable rooms and the kitchen are provided with adequate daylight, and that the orientation enhances amenity, including views. Single aspect dwellings that are north facing should be avoided. Having bay windows can optimise daylight and sunlight and allow buildings to be closer together than can otherwise be achieved.

Housing Design Standards LPG (June 2023)

- 2.18. The Mayor of London's London Plan Guidance *'Housing Design Standards'* (June 2023) brings together and helps to interpret the housing-related design guidance and policies set out in the London Plan 2021. It is applicable to self-contained residential applications (Use Class C3). It does not provide guidance on other specialist forms of housing such as shared living, temporary accommodation and student accommodation.
- 2.19. The standards are broken down into those that are expected to be met, and those that are best practice and therefore strongly encouraged.
- 2.20. Standards A1.7 to A1.9 dealing with placemaking and the public realm state:

The most favourable orientation for each new building will be heavily influenced by the site-specific opportunities and constraints. Layouts should optimise the orientation of new buildings to maximise the quality of daylight and thermal comfort for residents, minimise overheating, and optimise thermal efficiency, by utilising and controlling solar gains.

Particular consideration should be given to the impact of new development on the level of daylight and sunlight received by the existing residents in surrounding homes and on existing public green space.

The orientation and massing of buildings, and the separation distances between them, should ensure that the public realm is not unduly overshadowed to the detriment of health, wellbeing, biodiversity or amenity. Where demonstration is necessary and/or a building over 30 metres high is proposed, a micro-climate/wind/daylight and sunlight assessment should be submitted.

2.21. Standard B9.5 dealing with shared outside amenity space states:

Maximise the quality and availability of daylight and sunlight in communal outside spaces, particularly in winter. It is particularly important that spaces designed for frequent use (including sitting and play spaces) receive direct sunlight through the day, particularly at times they are most likely to be used.

2.22. Paragraph 4.1.2 states:

The standards in this section [Part C: Homes and private outside space] also aim to complement the consideration of daylight and sunlight impacts using the BRE guidance (Site layout planning for daylight and sunlight). This process involves a two-stage approach: firstly, by applying the BRE guidance; and secondly, by considering the location and wider context when assessing any impacts. With extreme weather events becoming increasingly common, design must balance daylight, passive solar gain and overheating considerations.

2.23. Standards C2.3 and C2.4 dealing with internal space standards state:

A minimum ceiling height of 2.5m is required for at least 75 per cent of the gross internal area (GIA) of each dwelling to enhance the spatial quality; improve daylight penetration and ventilation; and assist with cooling.

Best practice: The floor-to-floor height of ground-floor dwellings should be at least 3.5m in order to promote flexibility and greater daylight; and allow for easier conversion to non-residential uses if required

2.24. Standards C4.1 to C4.3 and C4.7 dealing with aspect, orientation, daylight and sunlight state:

New homes should be dual aspect unless exceptional circumstances make this impractical or undesirable; for example, when one side of the dwelling would be subjected to excessive noise or outside air pollution. Where single aspect dwellings are proposed, by exception, they should be restricted to homes with one or two bedspaces; should not face north; and must demonstrate that the units will: have adequate passive ventilation, daylight and privacy; and not overheat (particularly relevant for south or west-facing single aspect units). Note: See Appendix 3 [of the Housing Design Standards LPG] for definition of dual aspect.

The location of the main living and eating spaces, and the main private outside space, should be optimised to make the most of the best views and the orientation. These spaces should receive direct sunlight (south-facing is preferable, provided that appropriate shading devices are incorporated) and enjoy reasonable privacy through the careful placement of windows, balcony design or other measures.

All homes should allow for direct sunlight in conjunction with solar shading. As a minimum, at least one habitable room should receive direct sunlight – preferably the living area and/or the kitchen and dining space.

All habitable rooms (including a kitchen/dining room) should receive natural light and have at least one openable window that provides a view out when seated.

2.25. Standard C6.2 dealing with thermal comfort states:

Daylight and overheating assessments should be analysed together to determine the optimal balance. South and west-facing facades are most at risk to overheating, and the use of shading should be used to prevent direct sunlight from entering the home during at-risk periods.

Housing SPG (March 2016)

- 2.26. The Mayor of London's 'Housing Supplementary Planning Guidance' (March 2016) was developed to support previous versions of the London Plan but remains relevant for the implementation of the London Plan 2021.
- 2.27. Part 1.3 of the SPG deals with optimising housing potential in development opportunities. At paragraphs 1.3.45 and 1.3.46 it states:

Policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and

overshadowing and where tall buildings are proposed. An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.

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.

Local planning policy and guidance

Camden Local Plan 2017

- 2.1. The Camden Local Plan (adopted 3 July 2017) contains the following policies that are relevant to daylight and sunlight.
- 2.2. Policy H2 'Maximising the supply of self-contained housing from mixed-use schemes' aims to maximise the contribution towards Camden's pressing need for self-contained housing from mixed-use developments where they are able to create an acceptable level of amenity, including adequate daylight and sunlight.
- 2.3. Policy H6 'Housing choice and mix' seeks to secure high quality homes in all developments that include housing. The accompanying text notes that aspects of quality that impact on health and well-being of occupiers include daylight and sunlight (page 83, paragraph 3.139).
- 2.4. Policy A1 'Managing the impact of development' states:

The Council will seek to protect the quality of life of occupiers and neighbours. We will grant permission for development unless this causes unacceptable harm to amenity.

We will:

a. seek to ensure that the amenity of communities, occupiers and neighbours is protected;

The factors we will consider include: ... f. sunlight, daylight and overshadowing;

2.5. The supporting text states, at paragraph 6.5:

Loss of daylight and sunlight can be caused if spaces are overshadowed by development. To assess whether acceptable levels of daylight and sunlight are available to habitable, outdoor amenity and open spaces, the Council will take into account the most recent guidance published by the Building Research Establishment (currently the Building Research Establishment's Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice 2011). Further detail can be found within our supplementary planning document Camden Planning Guidance on amenity.

Camden Planning Guidance, 'Amenity'

2.6. Camden's Planning Guidance on Amenity (adopted January 2021) contains supplementary planning guidance of relevance to daylight and sunlight. It states:

The Council expects applicants to consider the impact of development schemes on daylight and sunlight levels. Where appropriate a daylight and sunlight assessment

should submitted which should be follow the guidance in the BRE's 'Site layout planning for daylight and sunlight: A guide to good practice'.

Levels of reported daylight and sunlight will be considered flexibly taking into account site-specific circumstances and context.

The Council aims to protect the quality of life of occupiers and neighbours through Local Plan policy A1 Managing the Impact of Development, which seeks to ensure that development does not cause unacceptable harm to amenity, including in terms of daylight and sunlight.

Major developments and proposals for new dwellings are expected to provide daylight and sunlight reports. These should always include the daylight and sunlight levels to any proposed new residential units. The reports should also include any nearby existing residential properties that may be affected. Although it is normally only residential uses that are assessed, there may also be non-residential uses, existing nearby or proposed as part of the application, that are particularly sensitive to light and so justify a report.

To help determine whether a daylight and sunlight report is needed for other types of development, the Council will have regard to several tests, taken from the BRE guidance. These are referred to as the 45-degree test and the 25- degree test.

The BRE guidance should form the basis for daylight and sunlight reports. They should be prepared by a specialist surveyor or consultant and assess the following:

- 1. Levels of daylight and sunlight that occupiers are likely to experience within the proposed development and gardens and open spaces (where relevant); and
- 2. The extent that the proposed development is likely to cause on levels of daylight and sunlight entering windows of neighbouring properties, gardens and open spaces (where relevant)

Daylight and sunlight reports should also demonstrate how the design has taken into consideration the guidance contained in the BRE document on passive solar design; and have optimised solar gain.

The Council will expect daylight and sunlight reports to report daylight and sunlight levels using the tools cited in the BRE guidance. The most common tools used are:

- Vertical Sky Component (VSC)
- No Sky Line (NSL) also referred to as Daylight Distribution (DD)
- Average Daylight Factor (ADF)
- Annual Probable Sunlight Hours (APSH)

Flexible consideration of daylight and sunlight

The Council notes the intentions of the BRE document is to provide advice to developers and decision makers and therefore it should be regarded as a guide rather than policy.

While we support the aims of the BRE methodology for assessing sunlight and daylight we will consider the outcomes of the assessments flexibly where appropriate, taking into account site specific circumstances and context. For example, to enable new development to respect the existing layout and form in some historic areas, or dense urban environments, it may be necessary to consider exceptions to the recommendations cited in the BRE guidance. Any exceptions will assessed on a case-by-case basis.

Camden Planning Guidance, 'Housing'

2.7. Camden's Planning Guidance on Housing (adopted January 2021) contains supplementary planning guidance of relevance to daylight and sunlight. It states:

Layout

In general, the internal layout should seek to ensure the main living room and other frequently used rooms are on the south side and rooms that require less sunlight (bathrooms, utility rooms) are on the north side. Kitchens are better positioned on the north side to avoid excessive heat gain.

Additionally, it is preferable that permanent partitions are present between eating and sleeping areas; and between kitchens and living rooms. Combined kitchens and living areas can be acceptable where sufficient floor area allows a greater range of activity.

- Dual aspect Proposals should achieve good dual aspect [London Housing SPG 2016 Standard 29]. Habitable rooms should also have suitable outlook.
- Natural light, Daylight/sunlight All the habitable rooms must have direct natural light, particularly the main living room. The applicant must ensure that the levels of daylight and sunlight that enter habitable rooms comply with BRE standards and that the report for 'Daylight and Sunlight' is submitted with the proposal [London Housing SPG 2016 Standard 32; CPG for Amenity].

Amenity

 Amenity of neighbours – The proposal should not have a significant detrimental impact to neighbouring amenity in terms of neighbouring outlook, privacy, sunlight, daylight, noise or vibration. Additionally, the proposal should not result in any overlooking into neighbouring habitable rooms. [Local Plan Policy A1; CPG for Design and for Amenity].

3. Acceptability of daylight/sunlight levels and effects

- 3.1. The assessment of the effects of development on daylight and sunlight amenity is a two-part process¹: first, as a matter of calculation, whether there would be a material deterioration in conditions by reference to the BRE guidelines; and second, as a matter of judgment, whether that deterioration would be acceptable in the circumstances.
- 3.2. The first stage can be addressed by applying the BRE assessment methodology and numerical guidelines. The second stage brings into play much wider considerations, such as:
 - i) Whether the neighbouring building stands unusually close to the site boundary, including the highway, taking more than its fair share of light, such that a greater reduction in light may be unavoidable if one site is not to be prejudiced by how another has been developed. (A 'mirror-image' study can be informative in such cases.)
 - ii) Whether windows in neighbouring buildings are self-obstructed by overhanging or inset balconies or other projections such as to make relatively larger reductions unavoidable even if there is a modest new obstruction opposite in effect themselves taking away more than their fair share of light. (A 'without balconies' study can be informative in such cases.)
 - iii) In historic city centres or areas characterised by modern tall buildings, high density and close proximity, a higher degree of obstruction may be unavoidable if new buildings are to match the height and proportion of existing buildings.
 - iv) In areas that are designated by planning authorities for substantial growth or providing opportunities for change and sustainable regeneration, the sort of change that would be brought about by the introduction of taller, denser development is to be expected, including reductions in daylight and sunlight levels, closer proximity, loss of outlook, etc.
- 3.3. Where a higher degree of obstruction may be unavoidable it is appropriate to consider the reasonableness of the retained levels of daylight and sunlight with the proposed development in place.

¹ Rainbird, R (on the application of) v The Council of the London Borough of Tower Hamlets [2018]

4. Assessment methodology and numerical guidelines

- 4.1. The technical assessments that underpin this daylight and sunlight study have been carried out in accordance with the assessment methodology recommended in the BRE guide.
- 4.2. The principal assessments and numerical criteria are summarised below. A fuller explanation of the assessment methodology is given at Appendix 1 of this report.

Daylight to neighbouring buildings

- 4.3. The BRE guidelines are intended for use for rooms in adjoining dwellings where daylight is required. Living rooms, dining rooms and kitchens have a greater requirement for daylight. Bedrooms should also be analysed but are less important. Bathrooms, stairwells and other areas without a requirement for daylight need not be assessed. (See BRE paragraphs 2.2.2 and 2.2.10).
- 4.4. If the head of the new development subtends an angle of more than 25° measured from the centre of the lowest affected window in an existing neighbouring building in a plane perpendicular to the window wall, then a more detailed check is needed to find the loss of skylight.
- 4.5. The more detailed tests are:
 - i) vertical sky component (**VSC**) at the centre of each main window, which measures the total amount of skylight available; and
 - ii) no-sky line (**NSL**) on the working plane inside a room, where room layouts are known, which measures the area that can receive direct skylight and assesses the distribution of daylight around the room.
- 4.6. The NSL test need only be run where room layouts are known, for example if they are available from the local planning authority's portal (see BRE paragraph 2.2.10).
- 4.7. Loss of daylight resulting from development will be noticeable if either:
 - the VSC at the centre of the window will be reduced to both less than 27% and less than 0.80 times its former value, or
 - the area of the working plane in a room that is enclosed by the no-sky line (NSL) and can receive direct skylight will be reduced to less than 0.80 times its former value.
- 4.8. For a bay window, the centre window facing directly outwards can be taken as the main window for the VSC calculation.
- 4.9. If there would be a significant loss of light to the main window but the room has one or more smaller windows, an overall VSC may be derived by weighting each VSC element in accordance with the proportion of the total glazing area represented by its window.
- 4.10. It is important to note that these numerical guidelines are purely advisory. The BRE guide (paragraph 2.2.3) states:

Note that 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.

Sunlight to neighbouring buildings

- 4.11. In designing new development, care should be taken to safeguard the access to sunlight for existing dwellings and any nearby non-domestic buildings where there is a particular requirement for sunlight.
- 4.12. Obstruction to sunlight may become an issue if part of the development is situated within 90° of due south of a main window wall of an existing building, and in the section drawn perpendicular to this existing window wall, the new development subtends an angle greater than 25° to the horizontal measured from the centre of the lowest window to a main living room.

- 4.13. In housing, the main requirement for sunlight is in living rooms and it is also required in conservatories, but it is viewed as less important in bedrooms and in kitchens. All main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90° of due south. Normally loss of sunlight need not be analysed to kitchens and bedrooms, except those that also comprise a living space. (See BRE paragraphs 3.1.2 and 3.2.3). Our assessment has therefore assessed the loss of sunlight to living rooms.
- 4.14. The amount of sunlight reaching a room is measured by calculating the percentage of annual probable sunlight hours (**APSH**) at the centre of its windows.
- 4.15. If, following development, the APSH will be greater than 25%, including at least 5% of APSH in the winter months between 21 September and 21 March, then the room should still receive enough sunlight.
- 4.16. Sunlight will be adversely affected if the centre of the window will:
 - receive less than 25% APSH or less than 5% APSH during the winter months (21 September to 21 March); and
 - less than 0.80 times its former sunlight hours during either period; and
 - the reduction in sunlight over the whole year will be greater than 4% APSH.

5. Scope of the assessment of neighbouring properties

- 5.1. The principal recommendations in the BRE guide relate to residential buildings. Its guidelines on daylight are intended for use for rooms in neighbouring dwellings where daylight is required, including living rooms, kitchens and bedrooms (BRE paragraph 2.2.2). Its guidelines on sunlight apply to all main living rooms of neighbouring dwellings and conservatories that have a window facing within 90° of due south (BRE paragraph 3.2.3).
- 5.2. Consequently, our assessment has been scoped to include nearby residential accommodation, as is common practice for studies for planning applications.
- 5.3. We identified properties with residential use from a site visit and online research, including the Valuation Office Agency council tax list, local authority planning records, and estate agency websites.
- 5.4. We have run the BRE daylight and sunlight tests in the existing baseline and proposed development scenarios. This establishes the levels that would be retained in the proposed development condition and the degree to which they could change from the existing baseline.
- 5.5. The properties considered are shown on the location plan at Appendix 2.
- 5.6. We note that the former stables to the rear of the site within the car park has consent as filed under 2022/0329/P for the change of use, refurbishment and internal alterations to provide residential accommodation. Having reviewed the proposed drawings prepared by UVAdesign Ltd, the single window in the end elevation which will have an aspect of the site does not serve a habitable room but a proposed storeroom. Therefore, we have on this basis discounted this property from any detailed analysis.

6. Information used in our technical study

- 6.1. We have undertaken our technical study using a 3D computer model built in AutoCAD and specialist analysis software, which runs the assessments recommended in the BRE guide.
- 6.2. We compiled our 3D computer model from the following information:
 - 6.2.1. 3D computer model of the existing buildings on the Site and the contextual massing produced from photogrammetry (aerial photography) supplied by AccuCities Ltd, subsequently enhanced by us with the more detailed information listed below
 - 6.2.2. Proposed development: 3D model supplied by De Metz Forbes Knight in November 2023 (file name: dMFK_2268_HPS_Proposed Model.dwg)
 - 6.2.3. Partial neighbouring measured survey: 2D elevations supplied by EDI Surveys Ltd (file name: 20139_Elevation Survey_Final.dwg)
- 6.3. Our 3D computer model is illustrated in our spot-height drawings at Appendix 2.
- 6.4. To aid accuracy of the assessment and interpretation of the results, we carried out online searches to obtain the floor plans for the neighbouring buildings referred to above, including from online planning application records and general estate agency websites. This is the approach recommended in the Professional Guidance Note, 'Daylighting and sunlighting' (1st edition, 2012), published by the Royal Institution of Chartered Surveyors, which states:

As a minimum, and subject to any limitations relating to a client instruction, surveyors should undertake searches of the local authority's planning portal to establish existing or proposed room layouts of neighbouring properties if they are available. This will ensure a robust approach and enable the surveyor to produce reliable information for daylight distribution analysis, ... Surveyors should also use the internet to search for other relevant information, including estate agent details, which commonly include plans of properties that can also be useful in determining a room layout or use.

6.5. Our research yielded the information listed in Table 1 below. The plan ref. refers to the numbering on the location plan at Appendix 2.

 Table 1 - Information on internal layouts of neighbouring properties

Plan ref.	Neighbouring building / property	Information used
3	26 Rosslyn Hill	Existing plans from withdrawn planning application ref: 2023/1116/P

- 6.6. Where we found plans for neighbouring properties, we used them to model their rooms. Where we were been unable to find plans, we modelled their rooms based on estimated dimensions, typically adopting a generic 4m-deep room for residential premises, unless the style of building suggested otherwise.
- 6.7. Window positions and sizes were built into the model for both 51 and 52 Downshire Hill using a combination of planning portal obtained elevations alongside brick counts from site photos obtained from our site visit undertaken on 16 November 2023.

Limitations and assumptions

- 6.8. In compiling our 3D computer model for our technical study, we have sought to be as accurate as reasonably possible within the scope of our instruction. We have relied upon the information noted above.
- 6.9. Whilst we have used plans for neighbouring buildings where available, we have typically made reasonable assumptions as to their internal floor levels and wall thicknesses.
- 6.10. We have used proven and trusted specialist computer software (Waldram Tools for AutoCAD[®]) to run the calculations recommended in the BRE guide.

6.11. To the best of our knowledge, the information and advice contained in this report is accurate at the date of issue, based on the information provided to or procured by us prior to its production.

7. Effects of the proposed development on neighbouring properties

- 7.1. The proposed development scenario is illustrated on spot-height drawing no. 23598_PR_001 at Appendix 2.
- 7.2. Daylight and sunlight levels in the proposed development scenario are shown in the results tables at Appendix 3 in the columns headed "Prop." (an abbreviation of "Proposed"). The difference between the existing and proposed levels is shown in the columns headed "Loss". The relative impact is shown in the columns headed "Pro./Ex." (an abbreviation of "Proposed/Existing") and is expressed as a ratio or factor of former value (e.g. 0.80 times former value). Any potential impacts outside the BRE guidelines are identified in red font.

Daylight to neighbouring properties

7.3. The results of the VSC and NSL analyses of the neighbouring buildings/properties are tabulated in Appendix 3 and summarised in Table 2 and Table 3 below.

	No. of windows	VSC (windows)						
Property address		No. windows	No. windows outside guidelines					
tested inside guidelines		inside guidelines	Low reduction	Medium reduction	High reduction	Sub-total		
52 Downshire Hill	16	16	0	0	0	0		
51 Downshire Hill	8	8	0	0	0	0		
26 Rosslyn Hill	17	196	0	0	1	1		
Totals:	41	40	0	0	1	1		
		98%	0%	0%	2%	2%		

Table 2 – Summary of VSC impacts to neighbouring windows

	No. of rooms	NSL (rooms)					
Property address		No. rooms	No. rooms outside guidelines				
	tested inside guidelines		Low reduction	Medium reduction	High reduction	Sub-total	
52 Downshire Hill	9	9	0	0	0	0	
51 Downshire Hill	8	8	0	0	0	0	
26 Rosslyn Hill	8	8	0	0	0	0	
Totals:	25	25					
		100%	0%	0%	0%	0%	

- 7.4. In the proposed development condition, the daylight impacts would be inside the BRE guidelines to 40 out of 41 windows (98%) for VSC and 25 out of 25 rooms (100%) for NSL.
- 7.5. Any daylight impacts on the following 2 buildings/properties would be fully inside the BRE guidelines (VSC and NSL):
 - 52 Downshire Hill
 - 51 Downshire Hill
- 7.6. The remaining 1 property would experience a single VSC impact outside the BRE guidelines. These are examined in more detail below.
- 7.7. The single window which experiences impacts outside the BRE guidelines is a single window at ground floor level located within the boundary wall. This is considered to be a secondary window serving a room which is served by three further windows fronting Rosslyn Hill in a bay window formation which are not materially affected by the proposals. The room itself would comfortably adhere to the NSL criteria.

Sunlight to neighbouring properties

7.8. The results of the annual and winter sunlight analyses are tabulated in Appendix 3 and summarised in Table 4 below.

	No. of rooms	No. inside annual &	APSH - annual (rooms)				APSH - winter (rooms)			
Property address			No. outside annual guidelines				No. outside winter guidelines			
	tested guidelines		Low reduction	Medium reduction	High reduction	Sub- total	Low reduction	Medium reduction	High reduction	Sub- total
52 Downshire Hill	9	9	0	0	0	0	0	0	0	0
51 Downshire Hill	8	8	0	0	0	0	0	0	0	0
26 Rosslyn Hill	4	4	0	0	0	0	0	0	0	0
Totals:	21	21	0	0	0	0	0	0	0	0
		100%	0%	0%	0%	0%	0%	0%	0%	0%

Table 4 - Summary of APSH impacts to neighbouring rooms

7.9. In the proposed development condition, the sunlight impacts would be fully inside the BRE guidelines (annual and winter sunlight) to 21 out of 21 rooms (100%).

8. Conclusion

- 8.1. The Site is in an urban location on the junction of Rosslyn Hill and Downshire Hill.
- 8.2. We assessed the potential effects of the proposed development on daylight and sunlight to surrounding residential properties.
- 8.3. We ran our assessments using methodologies recommended in the BRE guide.
- 8.4. The advice contained in the BRE guide is not mandatory and its numerical guidelines should be interpreted flexibly.
- 8.5. The daylight assessment undertaken demonstrate that with the exception of one window that all other rooms would comfortably meet the BRE guidelines in VSC terms. The single window does serve a room which contains three further windows which remain unaffected as a result of the proposals and all rooms considered for NSL comfortably meet the BRE guidelines.
- 8.6. The sunlight assessment demonstrates that all rooms considered which face within 90° of due south comfortably meet the BRE guidelines.
- 8.7. In conclusion, it is submitted that the layout of the proposed development is consistent with the Council's local planning policy on daylight and sunlight, particularly having regard to paragraph 125 of the National Planning Policy Framework and paragraphs 1.3.45 and 1.3.46 of the Mayor of London's Housing SPG.

Delva Patnan Redler

Delva Patman Redler LLP Chartered Surveyors

Chartered Surveyors

Appendix 1

Assessment methodology and glossary

1. This appendix explains the daylight and sunlight assessment methodology recommended in BRE Report 209, 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (2022 edition) and provides a glossary of the terminology used.

Assessment methodology

Daylight and sunlight to neighbouring buildings and amenity spaces

Daylight to neighbouring buildings

2. The BRE guide states:

In designing a new development or extension to a building, it is important to safeguard the daylight to nearby buildings. A badly planned development may make adjoining properties gloomy and unattractive.

The guidelines given here are intended for use for rooms in adjoining dwellings where daylight is required, including living rooms, kitchens and bedrooms. Windows to bathrooms, toilets, storerooms, circulation areas, and garages need not be analysed. The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices.

- 3. To quantify the impact of development on daylight to a building, the BRE guide recommends two tests:
 - a) calculating the vertical sky component (**VSC**) at the centre of each main window on the outside plane of the window wall, to measure the total amount of skylight available to the window; and
 - b) plotting the no-sky line (**NSL**) on the working plane inside a room, where layouts are known, and measuring the area that can receive direct skylight, to assess the distribution of daylight around the room.
- 4. The VSC measures the skylight available at the window. The guide states:

Any reduction in the total amount of skylight can be calculated by finding the VSC at the centre of each main window ... For a bay window, the centre window facing directly outwards can be taken as the main window. If a room has two or more windows of equal size, the mean of their VSCs may be taken. The reference point is in the external plane of the window wall. Windows to bathrooms, toilets, storerooms, circulation areas and garages need not be analysed.

5. The NSL test is described thus:

Where room layouts are known (for example if they are available on the local authority's planning portal), the impact on the daylighting distribution in the existing building should be found by plotting the no sky line in each of the main rooms. For houses this would include living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are less important. In non-domestic buildings each main room where daylight is expected should be investigated. The no sky line divides points on the working plane which can and cannot see the sky.

6. If, following development, the VSC to a neighbouring window will be greater than 27% then enough skylight should still be reaching the window. Any reduction below this level should be kept to a minimum. If the VSC will be both less than 27% and less than 0.80 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window is likely to appear more gloomy and electric lighting will be needed more of the time.

7. If, following development, the no-sky line moves so that the area of the existing room that can receive direct skylight will be reduced to less than 0.80 times its former value, this will be noticeable to the occupants and more of the room will appear poorly lit. This is also true if the no-sky line encroaches on key areas like kitchen sinks and worktops.

Sunlight to neighbouring buildings

8. The BRE guide states:

To assess 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. Kitchens and bedrooms are less important, although care should be taken not to block too much sun. Normally loss of sunlight need not be analysed to kitchens and bedrooms, except for bedrooms that also comprise a living space, for example a bed sitting room in an old people's home.

A point at the centre of the window on the outside face of the window wall may be taken [as the calculation point].

9. To quantify the available sunlight, the BRE guide advises measuring the percentage of annual probable sunlight hours (**APSH**), which is defined as follows:

'probable sunlight hours' means the total number of hours in the year that the sun is expected to shine on unobstructed ground, allowing for average levels of cloudiness for the location in question.

- 10. The assessment calculates the percentage of APSH over the whole year (annual sunlight) and between 21 September and 21 March (winter sunlight).
- 11. If, following development, the APSH to a neighbouring window will be greater than 25%, including at least 5% of APSH in the winter months between 21 September and 21 March, then the room should still receive enough sunlight. Any reduction in sunlight access below this level should be kept to a minimum.
- 12. If the available sunlight hours will be both less than the above amounts and less than 0.80 times their former value, either over the whole year or just in the winter months, then the occupants of the building will notice the loss of sunlight; if the overall annual loss is greater than 4% of APSH, the room may appear colder and less cheerful and pleasant.

Glossary of terms

13. The daylight and sunlight terminology used in our report is explained below.

Term	Meaning
Annual probable sunlight hours (APSH)	The long-term average of the total number of hours during a year in which direct sunlight is expected to shine on the unobstructed ground, allowing for average levels of cloudiness for the location in question.
Daylight	Combined skylight and sunlight.
No-sky line (NSL)	The outline on the working plane of the area from which no sky can be seen. It divides points on the working plane which can and cannot see the sky.
Obstruction angle	The angular altitude of the top of an obstruction above the horizontal, measured from a reference point in a vertical plane in a section perpendicular to the vertical plane.
Sky factor	Ratio of the parts of illuminance at a point on a given plane that would be received directly through unglazed openings from a sky of uniform

Term	Meaning
	luminance, to illuminance on a horizontal plane due to an unobstructed hemisphere of this sky. The sky factor does not include reflected light, either from outdoor or indoor surfaces.
Sun on ground (SOG)	The measure of sunlight potential to gardens and amenity spaces. It is measured in hours on the spring equinox (21 March) at a point on the ground accounting for the latitude of the site location. Sunlight below an altitude of 10° is usually discounted as it is likely to be prevented from reaching the ground by fences, plants or other low-level obstructions.
Vertical sky component (VSC)	The amount of daylight falling on a vertical wall or window. It is the ratio of that part of illuminance, at a point on a given vertical plane (e.g. window), that is received directly from a CIE standard overcast sky, to simultaneous illuminance on a horizontal plane due to an unobstructed hemisphere of this sky. The VSC does not include reflected light, either from the ground or from other buildings. The ratio is usually expressed as a percentage. The maximum value is almost 40% for a completely unobstructed vertical wall.
Working plane	Horizontal, vertical or inclined plane in which a visual task lies. Normally the working plane may be taken to be horizontal, 0.85 m above the floor in housing.

Appendix 2

Location drawings

Site location plan Spot-height drawings Window maps



- 1: <u>52 Downs</u> Dwg No:
- 2: <u>51 Downs</u> Dwg No:
- 3: <u>26 Rossyln</u> Dwg No: 2

NEIGHBOURING PROPERTIES CONSIDERED FOR ANALYSIS 1: <u>52 Downshire Hill:</u> Dwg No: 23598-LOC-001 2: <u>51 Downshire Hill:</u> Dwg No: 23598-LOC-001 3: <u>26 Rossyln Hill:</u> Dwg No: 23598-LOC-002	NO DIMENSIONS TO BE SCALED FROM THIS DRAWING KEY: Existing Consented Proposed Cumulative Neighboring Cutback Property Cutback Envelope SOURCE DATA: EXISTING & SURROUNDING BUILDINGS: Accucities 3D model 3D model received on 09/11/2023 dMFK Architcts 3D model received on 22/11/2023 dMFK_2268_HPS_Historic Phasing Model
	NOTES: All neighbouring properties considered for analysis
	REV Description Drawn Date
	DELVA PATMAN REDLER Chartered Surveyors London 020 7936 3668 Liverpool 0151 242 0980 Bristol 0174 450 9703 www.delvapatmanredler.co.uk info@delvapatmanredler.co.









NO DIMENSIONS TO BE SCALED FROM THIS DRAWING

W1 Windows tested Daylight only

Windows tested Daylight & Sunlight

SOURCE DATA: EXISTING & SURROUNDING BUILDINGS: Accucities 3D model 3D model received on 09/11/2023 dMFK Architcts 3D model received on 22/11/2023 dMFK_2268_HPS_Historic Phasing Model

All neighbouring properties considered for analysis



REV	Description	Drawn	Date						

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FORMER HAMPSTEAD POLICE STATION LONDON NW3 1PA

KEY WINDOW LOCATIONS 3D View

52 & 51 Downshire Hill

DRAWN: MJ SCALE: NTS DATE: 28/11/2023 DWG NO:

JOB NBR: 23598

REV:

-



Appendix 3

Daylight and sunlight results for neighbouring buildings

vsc

APSH (room)

Chartered Surveyors

Scheme: 01-AR-2023-11-22 Scenario: Existing v Proposed							
Property, room & window	Property, room & window attributes						
Floor Room Room use	Window Ref./Orientation	Exis. (% VSC)	P (%				
Note: Red = outside BRE	guidelines; E	slue = ga	in				

Floor	Room	Room use		dow	Exis.	Prop.	Loss	Pro./Ex.	Exis.	Prop.	Loss	Pro./Ex.	, r	Annual	(%APS	H) Dur (Eu	Winter (%APSH)		
			Ret./Orie	entation	(% VSC)	(% VSC)	(% VSC,) ratio	(% rm)	(% rm)	(m²)	ratio	Exis.	Prop.	Loss	Pro./Ex	Exis.	Prop. I	Pro./Ex.
Note:	Red =	outside BRE	guidelir	nes; E	Blue = g	ain in ligi	ht												
<mark>52 Do</mark>	wnshir	e Hill																	
B00	R1	Residential	W1	Ы	21.1	20.7	0.4	0.98											
		Residential	W2	Ы	20.7	20.5	0.2	0.99	99%	99%	0.00	1.00	39	39	0	N/A	1	1	N/A*
	R2	Residential	W3	М	23.9	23.6	0.3	0.99											
		Residential	W4	И	23.7	23.3	0.4	0.98	89%	88%	0.04	1.00	49	48	N/A	N/A	7	7	N/A
F00	R1	Residential	W1	Ы	27.8	27.3	N/A	N/A											
		Residential	W2	Ы	28.6	28.1	N/A	N/A	99%	99%	0.00	1.00	55	54	N/A	N/A	10	9	N/A
	R2	Residential	W3	Ы	28.4	27.9	N/A	N/A											
		Residential	W4	Ы	26.9	26.4	0.5	0.98	98%	98%	0.00	1.00	56	54	N/A	N/A	12	10	N/A
F01	R1	Residential	W1	Ы	31.3	30.6	N/A	N/A											
		Residential	W2	Ы	32.2	31.6	N/A	N/A	98%	98%	0.00	1.00	59	58	N/A	N/A	13	12	N/A
	R2	Residential	W3	Ы	32.5	32.1	N/A	N/A	97%	97%	0.00	1.00	60	59	N/A	N/A	16	15	N/A
F02	R1	Residential	W1	Ы	35.0	34.0	N/A	N/A											
		Residential	W2	Ы	35.6	34.9	N/A	N/A	98%	98%	0.00	1.00	65	62	N/A	N/A	19	16	N/A
	R2	Residential	W3	Ы	36.2	35.7	N/A	N/A	97%	97%	0.00	1.00	66	64	N/A	N/A	21	19	N/A
F03	R1	Residential	W1	Ы	38.6	38.4	N/A	N/A											
		Residential	W2	7	34.1	34.1	N/A	N/A	99%	99%	0.00	1.00	69	69	N/A	N/A	23	23	N/A
51 Do	wnshir	e Hill																	
B00	R1	Residential	W1	Z	18.6	18.3	0.3	0.98	95%	95%	0.00	1.00	39	38	N/A	N/A	8	8	N/A
	R2	Residential	W2	N	24.0	23.8	0.2	0.99	94%	93%	0.09	0.99	45	45	0	N/A	4	4	N/A*
F00	R1	Residential	W1	N	20.1	19.7	0.4	0.98	99%	99%	0.00	1.00	42	41	N/A	N/A	12	11	N/A
	R2	Residential	W2	N	32.3	32.1	N/A	N/A	97%	97%	0.02	1.00	61	61	N/A	N/A	15	15	N/A
F01	R1	Residential	W1	ĸ	5.4	5.3	0.1	0.98	12%	12%	0.00	1.00	23	23	0	1.00	10	10	N/A
	R2	Residential	W2	N	35.5	35.3	N/A	N/A	96%	96%	0.00	1 00	66	65	N/A	N/A	20	19	N/A
F02	R1	Residential	W1	V	10.1	10.1	0.0	1 00	20%	20%	0.00	1 00	29	29	N/A	N/A	10	10	N/A
	R2	Residential	W2		37.0	36.9	N/A	N/A	95%	95%	0.00	1 00	69	67	N/A	N/A	23	21	N/A
26 Ro	sslvn H	4111																	
F00	R1	Residential	W1	7	25.9	24.9	1.0	0.96	95%	95%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
	R2	Residential	W2	N	17.2	17.2	0.0	1 00											
		Residential	W3	N	22.3	22.3	0.0	1 00											
		Residential	W4	7	32.5	26.3	6.2	0.81	97%	95%	0 19	0.98	34	34	N/A	N/A	6	6	N/A
	R3	Residential	W5	5	1.5	0.0	1.5	0.00	0.70	0070	0.10	0.00	0.1		,, .		0		
		Residential	W6	7	0.1	0.1	0.0	1 00											
		Residential	W7	V	20.1	20.2	-0.1	1.00											
		Residential	W8		14.4	14.4	0.0	1.00	79%	79%	0.00	1 00	52	52	NI/A	NI/A	20	20	NI/A
F01	R1	Residential	W1	7	25.0	25.0	0.0	1.00	1070	1070	0.00	1.00	02		14/74	14/7 4	20		14/71
101		Residential	W/3	5	6.9	6.0	0.0	1.00											
		Residential	W4		29.5	29.5	N/A	N/A											
		Residential	W5	E N	23.5	23.5	0.0	1.00	0.8%	08%	0.00	1.00	86	86	NI/A	NI/A	27	27	NI/A
	PD	Residential	W0	2	31.5	21.7	0.0	N/A	0,20%	0.80%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
E02	RZ P1	Residential	VVZ	71	32.0	20.1	N/A	N/A	90%	50 %	0.03	1.00	NOITH	NORT	N/A	N/A	NOILI	NUTLI	IN/A
102	KT	Posidential			33.4	33.1	N/A	N/A	100%	100%	0.00	1.00	01	01	NI/A	NI/A	20	20	NI/A
	PO	Residential	W4	~	36.0	32.4	N/A	N/A	0.20/	0.00%	0.00	1.00	North	Morth	N/A	N/A	ZO	North	NI/A
	R2	Residential	WZ	7	24.6	22.2	N/A	N/A	0.00/	00%	0.00	1.00	North	North	N/A	N/A	North	North	NI/A
	RO	Residential	vv3		34.0	33.3	IN/A	IN/A	90%	90%	0.05	1.00	NOLU	NOUU	IN/A	IN/A	NOLLU	NUTITI	IN/A

NSL