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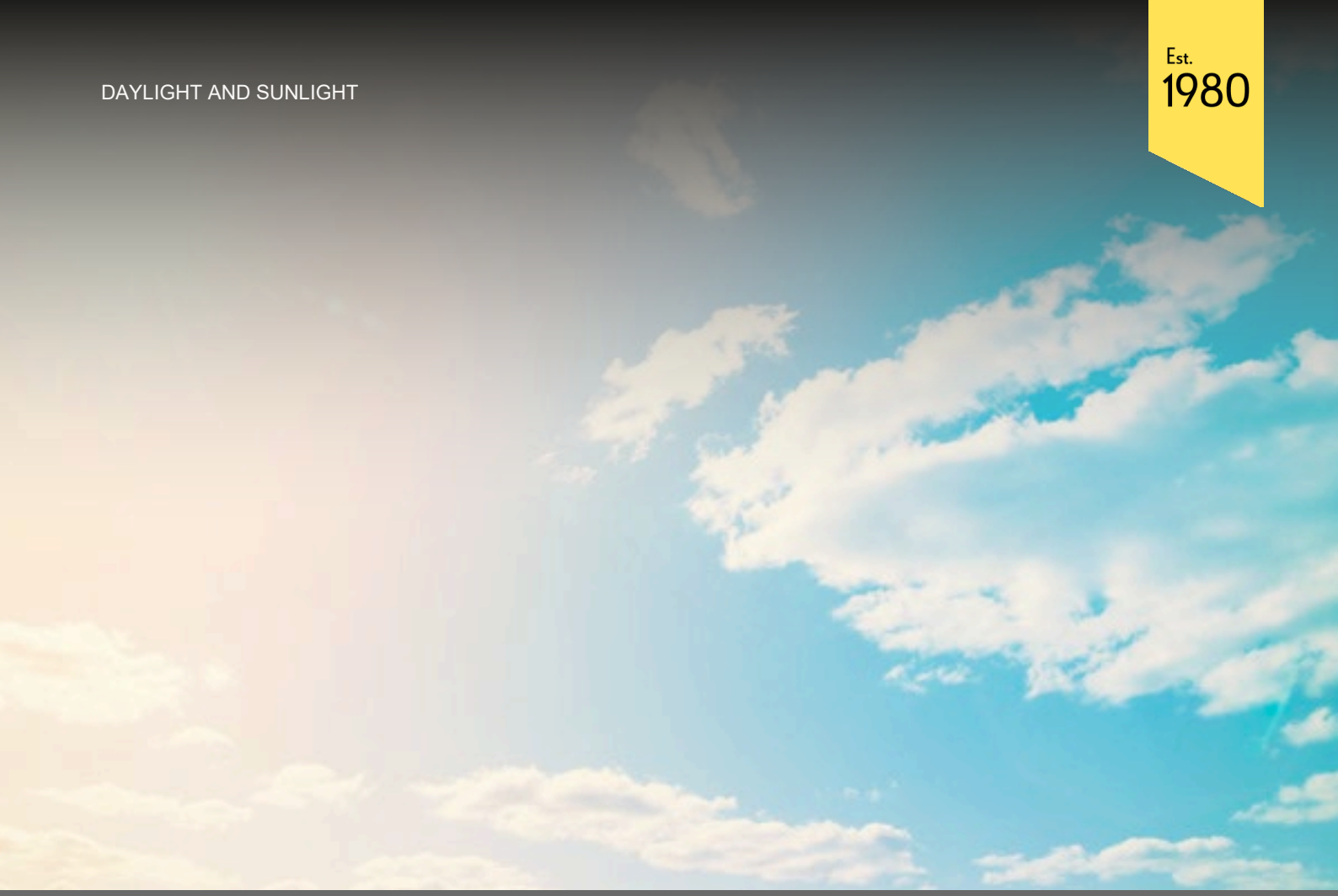

151 SHAFTESBURY AVENUE, LONDON WC2

Daylight and Sunlight Effects Report (Neighbouring Properties)

May 2024

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APPENDICES

1. Introduction

1.1. Delva Patman Redler LLP have been engaged by the Applicant to assess the potential effects of the proposed development at Shaftesbury House, 151 Shaftesbury Avenue, London WC2H 8AL ("the Site") on daylight and sunlight to neighbouring properties and amenity spaces. 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 centrally in London's West End, and is within London's Central Activities Zone, the Tottenham Court Road Opportunity Area, and London Borough of Camden's Central London area, where taller, higher density development is anticipated.

1.4. The proposed development comprises complete refurbishment, retention and extension to optimise office floor space delivery and provide excellent sustainability credentials. Our 3D computer model of the proposed development and surrounding context is shown in the plan and 3D view drawings at Appendix 2.

1.5. 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.

1.6. 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 (December 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.

National Design Guide (January 2021)

2.2. 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.

2.3. 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.*

National Model Design Code (June 2021)

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

2.5. 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.*

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

2.6. 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.

2.7. The BRE guide states:

> *Summary*
>
> *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)

2.8. 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.

2.9. 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'*

2.10. 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'*

2.11. 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…

Local planning policy and guidance

Camden Local Plan 2017

2.12. The Site sits within the Central London area within the London Borough of Camden. The Camden Local Plan (adopted 3 July 2017) states:

The attractions of Camden's Central London area mean that development here is expected to take place both in the identified growth areas and at other sites outside them.

2.13. Policy A1 'Managing the impact of development' is relevant to daylight and sunlight and 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;

2.14. 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.

2.15. The Council has been consulting on a draft new Local Plan, publishing a consultation version in January 2024. The projected timeframe for adoption of a new Local Plan is Summer 2026.

Camden Planning Guidance, 'Amenity'

2.16. 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 [sic] 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.

3.7 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.

3.8 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.

3.9 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)*

3.10 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.

3.11 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

3.14 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.

3.15 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'

2.17. 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 process[1]: 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. It should be noted that the Site is within London's Central Activities Zone, the Tottenham Court Road Opportunity Area (which was designated in 2008 and is part of the Central London Growth Corridor), and London Borough of Camden's Central London area. It is therefore in an area where taller, higher density development is anticipated.

3.4. 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). Whilst we have assessed sunlight to all rooms for completeness, weight should only be applied to the results for 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.

Sunlight to neighbouring gardens and amenity spaces

4.17. Sunlight should be assessed on the equinox (21 March) to main back gardens of houses, allotments, parks and playing fields, children's playgrounds, outdoor swimming pools, sitting-out areas such as in public squares, and focal points for views, such as a group of monuments or fountains.

4.18. The assessment measures the percentage of each area that can receive at least two hours of sunlight on 21 March – the two-hours sun-on-ground (**SOG**) test.

4.19. If, following development, the area of the garden or other amenity space that can receive two hours of direct sunlight on 21 March is reduced to both less than 50% of its total area and less than 0.80 times its former value, the loss of sunlight is likely to be noticeable and the space will tend to look more heavily overshadowed.

4.20. The assessment normally excludes sunlight at an altitude of 10° or less and ignores fences or walls less than 1.5 metres high, and trees and shrubs. Front gardens, driveways and hard standings for cars need not be assessed.

5. Categorisation of magnitudes of impact and significance of effects

5.1. In our summary tables, we have counted the number of impacts inside and outside the BRE guidelines and categorised the latter according to their magnitude of impact. The BRE guide does not include a standard scale of impact, so this study adopts the widely used approach in Table 1 below.

***Table 1** – Categorisation of magnitudes of impact on existing neighbouring properties*

Impact inside BRE guidelines	Impact outside BRE guidelines		
	0.70-0.79 times former value *(21% to 30% loss)*	0.60-0.69 times former value *(31% to 40% loss)*	<0.60 times former value *(>40% loss)*
Negligible impact	Low impact	Medium impact	High impact

5.2. To understand the significance of effect on a building, it is necessary to consider both the number and magnitude of impacts and a range of other factors. Appendix H of the BRE guide, which is intended for use in Environmental Impact Assessments, provides the following advice on ascribing significance to effects:

> *Adverse impacts occur when there is a significant decrease in the amount of skylight and sunlight reaching an existing building where it is required, or in the amount of sunlight reaching an open space.*
>
> *The assessment of impact will depend on a combination of factors, and there is no simple rule of thumb that can be applied.*
>
> *Where the loss of skylight or sunlight fully meets the guidelines in this document, the impact is assessed as negligible or minor adverse. Where the loss of light is well within the guidelines, or only a small number of windows or limited area of open space lose light (within the guidelines), a classification of negligible impact is more appropriate. Where the loss of light is only just within the guidelines, and a larger number of windows or open space area are affected, a minor adverse impact would be more appropriate, especially if there is a particularly strong requirement for daylight and sunlight in the affected building or open space.*
>
> *Where the loss of skylight or sunlight does not meet the guidelines, the impact is assessed as minor, moderate or major adverse. Factors tending towards a minor adverse impact include:*
>
> - *only a small number of windows or limited area of open space are affected*
> - *the loss of light is only marginally outside the guidelines*
> - *an affected room has other sources of skylight or sunlight*
> - *the affected building or open space only has a low level requirement for skylight or sunlight*
> - *there are particular reasons why an alternative, less stringent, guideline should be applied, for example an overhang above the window or a window standing unusually close to the boundary.*
>
> *Factors tending towards a major adverse impact include:*
>
> - *a large number of windows or large area of open space are affected;*
> - *the loss of light is substantially outside the guidelines;*
> - *all the windows in a particular property are affected; and*
> - *the affected indoor or outdoor spaces have a particularly strong requirement for skylight or sunlight, e.g. a living room in a dwelling or a children's playground.*

5.3. Although the proposed development is not EIA development, the above guidance still has relevance in understanding the likely significance of the daylight and sunlight effects.

5.4. The sensitivities of the various receptors are set out in Table 2 below.

***Table 2** – Receptor sensitivity descriptors*

Sensitivity	Receptors for daylight assessment	Receptors for sunlight assessment
High	Main living rooms and kitchens	Main living rooms, back gardens, and shared or public amenity spaces
Medium	Bedrooms	-
Low	-	Kitchens and bedrooms
Negligible	Circulation spaces, bathrooms and other non-habitable rooms	Circulation spaces, bathrooms and other non-habitable rooms

6. Flexible application of the guidelines and alternative target values

6.1. As noted in paragraph 2.7 above, the introduction to the BRE guide states that its default numerical guidelines are not mandatory and must be interpreted flexibly because natural lighting is only one of many factors in site layout design. In certain circumstances, such as city centres or areas 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.

6.2. This theme is repeated at various points in the guide, as follows:

> *[Daylight to buildings:] 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. (Paragraph 2.2.3)*
>
> *[Sunlight to buildings:] In certain situations care needs to be taken in applying these (sunlight) guidelines… The guidelines are purely advisory. Planning authorities may wish to use different criteria based on the requirements for sunlight in particular types of developments in particular areas. Sometimes a larger reduction in sunlight may be necessary if new development is to match the height and proportion of existing buildings nearby. (Paragraph 3.2.10)*

6.3. As the Site sits within London's Central Activities Zone, a higher degree of obstruction is to be expected.

6.4. We set out below some examples of a flexible approach to applying the BRE guidelines that are of relevance.

Reasonableness of retained values in a site's context

6.5. One example of flexible application of the guidelines was demonstrated in the Inspector's appeal decision for a development of the Whitechapel Estate site between Varden Street and Ashfield Street, London E1 in the London Borough of Tower Hamlets in February 2018 (Appeal Ref: APP/E5900/W/17/3171437).

6.6. In the aforementioned case the Inspector found that materially adverse impacts on daylight were nonetheless acceptable. He noted that development that resulted in a proportion of residual VSC values in the mid-teens, with a smaller proportion in the bands below 15% VSC, have been found acceptable in major developments across London. More specifically, the Inspector stated:

> *108. The BRE document offers guidance on generally acceptable standards of daylight and sunlight, but advises that numerical values are not to be rigidly applied and recognises the importance of the specific circumstances of each case. Inner city development is one of the examples where a different approach might be justified. This is specifically endorsed by the [Mayor of London's] Housing SPG, which calls for guidelines to be applied sensitively to higher density developments, especially in (among others) opportunity areas and accessible locations, taking into account local circumstances, the need to optimise housing capacity, and the scope for the character and form of an area to change over time. … I agree with the appellants that blanket application of the BRE guide optimum standards, which are best achieved in relatively low-rise well spaced layouts, is not appropriate in this instance.*
>
> *109. The SPG advises that the daylight impact on adjacent properties should be assessed drawing on "broadly comparable residential typologies within the area and of a similar nature across London"...*
>
> *112. The figures [from comparable typologies from a range of example sites across Central London analysed by the appellants, comprising both traditional urban streets and recently permitted areas of significant development] show that a proportion of residual Vertical Sky Component ('VSC') values in the mid-teens have been found acceptable in major developments across London. This echoes the Mayor's endorsement in the preSPG decision at Monmouth House, Islington that VSC values in the mid-teens are*

> *acceptable in an inner urban environment. They also show a smaller proportion in the bands below 15%...*
>
> *113. I acknowledge that a focus on overall residual levels could risk losing sight of individual problem areas. It is accepted that light is only one factor in assessing overall levels of amenity, but I consider that the trade-off with other factors, such as access to public transport or green space, is likely to be of more relevance to an occupier of new development than to an existing neighbour whose long-enjoyed living conditions would be adversely affected by new buildings. However, I also consider that Inner London is an area where there should generally be a high expectation of development taking place. This is particularly so in the case of the appeal site, where the Whitechapel Vision Masterplan and the City Fringe Opportunity Area Planning Framework have flagged the desirability of high density development. Existing residents would in my view be prepared for change and would not necessarily expect existing standards of daylight and sunlight to persist after development.*

6.7. Ultimately, it is for the planning authority to judge whether affected properties would be left with acceptable levels of daylight and sunlight in their neighbourhood context, having regard to all relevant planning policies and guidance and balanced against the merits of the proposed development.

Layout and use of affected property

6.8. The layout and use of the affected property was considered carefully by the Inspector in her report leading to the Secretary of State's call-in decision to grant planning permission for the redevelopment of the former London Television Centre, 60-72 Upper Ground, London SE1 in the London Borough of Southwark in February 2024 (Appeal Ref: APP/N5660/V/22/3306162). The Secretary of State agreed with the Inspector's conclusions that, despite numerous high-magnitude daylight impacts (greater than 40% reduction), the residents of an affected social housing block would not experience unacceptable levels of loss of daylight and the impact of the proposal would not be unreasonable.

6.9. In reaching that conclusion, the Inspector noted that the design of the social housing block addressed its dense urban environment, with many of the dwellings being dual aspect and having balconies and rooms overlooking a central private landscaped green space. Living/kitchen/dining rooms (LKDs) facing the development were well proportioned, had relatively large windows, and took borrowed light from the south-facing entrance halls via internal glazed doors. In other flats, the LKDs faced onto the central garden and their light would be unaffected.

6.10. The Inspector regarded the use of some bedrooms for studies or homeworking as a matter of personal choice for the occupiers, but mainly they were used for sleeping. Where desks were evident during her site visit, they were positioned close to a window to maximise the use of natural light and outlook.

6.11. The Inspector also noted there is no distinction made between social or private housing in planning terms to the application of the BRE Guide or planning policy.

6.12. The dual-aspect nature of an affected social housing block, and the small size of the affected kitchens (which disqualified them from habitable room status), were factors in the Inspector's decision to grant permission in an appeal at Graphite Square, London SE11 in the London Borough of Lambeth in September 2019 (Appeal Refs. APP/N5660/W/18/3211223 and APP/N5660/W/19/ 3225761).

Proximity of neighbouring building to site boundary

6.13. Another important issue is whether the existing building is itself a good neighbour, standing a reasonable distance from the boundary and taking no more than its fair share of light. Appendix F of the BRE guide gives further guidance. This involves setting alternative target values generated from the layout dimensions of the existing neighbouring building and its position relative to the boundary. To ensure that new development matches the height and proportions of existing buildings, the VSC and APSH targets for the neighbouring windows could be set to those for a 'mirror-image' building of the same height and size, an equal distance away on the other side of the boundary.

6.14. In the Inspector's appeal decision for a development at Enterprise House, 21 Buckle Street, London E1 8NN in the London Borough of Tower Hamlets dated 17 December 2018 (Appeal Ref:

APP/E5900/W/17/3191757) he interpreted this as applying to buildings built at the back edge of pavement and whose windows were therefore "effectively on the site boundary". He stated:

> *19. … The BRE Guide recognises that windows that are unusually close to the boundary take more than their fair share of light. This is an acknowledgement that the first built scheme of a local cluster could otherwise prevent the full potential of adjacent sites from being realised.*
>
> *20. In such inequitable circumstances the Rainbird judgement found that 'If an existing building has been so designed that, whether by the inclusion of balconies or overhangs, it makes relatively larger reductions in daylight unavoidable even if there is a modest new obstruction opposite, that design could be seen as taking for the existing building 'more than their fair share of light' in the same way the BRE Guide regards a building that has windows that 'are unusually close to the site boundary' as doing; in each case, a greater reduction in daylight and sunlight may be unavoidable if one site is not to be unfairly prejudiced by how another has been developed.'*[2]
>
> *21. In such a situation the BRE Guide advises that 'To ensure that new development matches the height and proportion of existing buildings, the VSC and APSH targets for these windows could be set to those for a 'mirror-image' building of the same height and size, an equal distance away on the other side of the boundary.*[3]
>
> *22. The appellants carried out an assessment of the impact on all affected windows through a range of criteria, including a mirror image exercise with the 28 storey Altitude/Goldpence Apartments building…*
>
> *23. The mirror-image exercise, although not quite to the letter of the guidelines, gives a clear indication that overall, in this more equitable arrangement, many more flats in the Altitude/Goldpence Apartments building would be affected and many more in the upper storeys would have a material deterioration in daylight and sunlight levels similar to those in the lower storeys. Such an impact would be considered acceptable, in terms of a fair share of light. In my view this provides a reasonable justification for a greater reduction in daylight and sunlight levels in the surrounding buildings as a result of this proposal than might otherwise be considered appropriate. By strictly applying the BRE guidelines, development of the site would be unfairly prejudiced.*

Self-obstructing balconies, wings and other projections

6.15. Balconies and projecting wings to existing neighbouring buildings obstruct the available daylight and sunlight and can therefore cause relative reductions in light to be amplified. The BRE guide states:

> *2.2.13 Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct skylight. One way to demonstrate this would be to carry out an additional calculation of the VSC and area receiving direct skylight, for both the existing and proposed situations, without the balcony in place. For example, if the proposed VSC with the balcony was under 0.80 times the existing value with the balcony, but the same ratio for the values without the balcony was well over 0.8, this would show that the presence of the balcony, rather than the size of the new obstruction, was the main factor in the relative loss of light.*
>
> *2.2.14 A larger relative reduction in VSC may also be unavoidable if the existing window has projecting wings on one or both sides of it, or is recessed into the building so that it is obstructed on both sides as well as above.*

[2] Rainbird, R (on the application of) v The Council of the London Borough of Tower Hamlets [2018]
[3] Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2nd Edition, 2011) - Appendix F para F5.

> *3.2.11 Balconies and overhangs above an existing window tend to block sunlight, especially in summer above south-facing windows. Even a modest obstruction opposite may result in a large relative impact on the sunlight received. One way to demonstrate this would be to carry out an additional calculation of the APSH, for both the existing and proposed situations, without the balcony in place. For example, if the proposed APSH with the balcony was under 0.80 times the existing value with the balcony, but the same ratio for the values without the balcony was well over 0.80, this would show that the presence of the balcony, rather than the size of the new obstruction, was the main factor in the relative loss of sunlight.*

6.16. Clearly, balconies, wings and other projections from buildings can be a factor in the relative light loss to such buildings. In such instances it can be helpful to run a supplementary assessment with the projections removed, in order to understand the degree to which they contribute to the relative light loss.

6.17. Overhanging deck-access balconies and roof, which restricted daylight to kitchens and bedrooms immediately beneath them and caused such rooms to be reliant on electric lighting much of the time, were a factor in the Inspector's decision to grant permission in an appeal at Graphite Square, London SE11 in the London Borough of Lambeth in September 2019 (Appeal Refs. APP/N5660/W/18/3211223 and APP/N5660/W/19/3225761).

Deep, side-lit rooms

6.18. Another example where the standard numerical guidelines need to be applied sensibly is in relation to deep, side-lit rooms. The BRE guide states:

> *If an existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the no sky line may be unavoidable.*

7. Scope of the assessment of neighbouring properties

7.1. 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).

7.2. Consequently, our assessment has primarily been scoped to include nearby residential accommodation, as is common practice for studies for planning applications, and relevant amenity spaces. We identified properties with residential use from a site visit and online research, including local authority planning records. The residential properties that we assessed are:

1. Pendrell House, New Compton Street (Soho Housing Association)
2. 45 New Compton Street (flats)
3. 167-177 Shaftesbury Avenue (flats)
5. 166-170 Shaftesbury Avenue (flats)

7.3. For completeness, we also assessed two non-residential properties on the opposite side of Shaftesbury Avenue within the Seven Dials Conservation Area:

4. The church at 166a Shaftesbury Avenue on the corner of Mercer Street (originally Soho Baptist Chapel, now the Chinese Church in London); and
6. The hotel at 172-176 Shaftesbury Avenue, which also runs through to Monmouth Street (originally the French hospital, now the Covent Garden Hotel).

7.4. As the latter two properties are non-residential use, we have treated them as low sensitivity receptors.

7.5. The locations of the properties are shown in Figure 2 below and on the plan in Appendix 2.

Figure 2 – Location of neighbouring buildings included in our assessment

7.6. 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.

7.7. Since running our assessment, we have become aware of applications for planning permission and listed building consent (references 2024/0993/P and 2024/1005/L) registered on 20 March 2024 for a proposed development of the former Saville Theatre, 135-149 Shaftesbury Avenue, to the southwest of the Site. The development would comprise a large roof extension of six additional storeys plus roof plant enclosure. The proposed additional massing is coloured green in the massing image in Figure 3 below. The existing building on the Site at 151 Shaftesbury Avenue is tinted blue-grey.

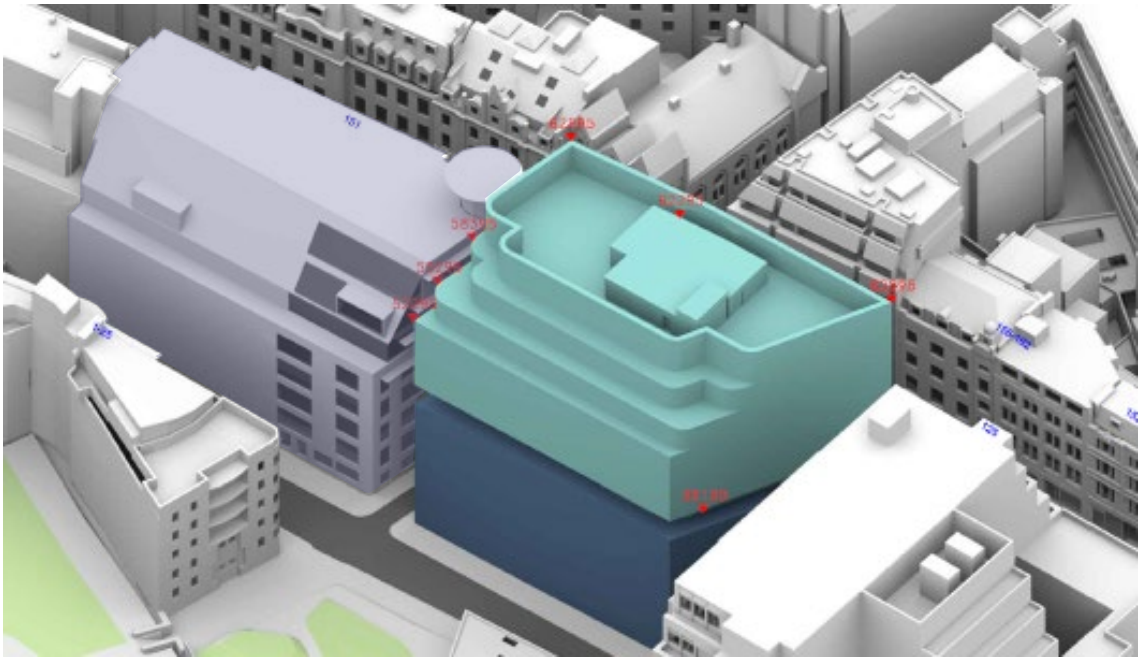


Figure 3 – Massing model of proposed roof extension (coloured green) to Saville Theatre (planning application reference 2024/0993/P). Image reproduced from Point 2 Surveyors' daylight and sunlight report. The existing building on the Site at 151 Shaftesbury Avenue is tinted blue-grey.

7.8. We are also aware that a smaller previous development proposal for the Saville Theatre (planning application reference 2017/7051/P and listed building consent reference 2018/0037/L) was refused permission in July 2019 and the subsequent Appeal was dismissed in March 2021.

7.9. We have not carried out a quantitative cumulative impact assessment of the latest development proposal for the Saville Theatre in combination with the proposed development of the Site. Instead, we have carried out a qualitative assessment by reviewing the results of our assessment and those of the assessment submitted with planning application reference 2024/0993/P and using professional judgment to comment of the potential cumulative effects.

8. Information used in our technical study

8.1. 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.

8.2. We compiled our 3D computer model from the following information:

8.2.1. 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

8.2.2. 2D measured survey produced by Archway Consultancy in May 2022

8.2.3. 3D measured survey model of the existing building produced by Archway Consultancy in May 2022

8.2.4. Floor plans for neighbouring buildings, where available

8.2.5. Proposed development: 3D model supplied by Buckley Gray Yeoman Architects in January 2024 (file name: 240131_151 Shaftesbury Ave), which we understand made use of 2D measured survey produced by Plowman Craven Ltd in August 2023

8.3. Our 3D computer model is illustrated in our spot-height drawings at Appendix 2.

8.4. To aid accuracy of the assessment and interpretation of the results, we carried out online searches to try to obtain the floor plans for the relevant neighbouring buildings, including from online planning application records.

8.5. Our research yielded the floor plans listed in Table 3 below, which we used to model the rooms in these properties. The plan ref. refers to the numbering on the location plan at Appendix 2.

***Table 3** - Information on internal layouts of neighbouring properties*

Plan ref.	Neighbouring building / property	Information used
4	172-176 Shaftesbury Avenue (hotel)	Plans from planning consent ref. PSX0205056
5	166-170 Shaftesbury Avenue	Plans from planning consent ref. 2014/275/P

8.6. Where we were been unable to find plans, we modelled the rooms based on estimated dimensions (typically adopting a generic 4.2m-deep room for residential premises, unless the style of building suggested otherwise) and based room uses on careful observations made during our site visit.

Limitations and assumptions

8.7. 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.

8.8. 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.

8.9. We have used proven and trusted specialist computer software (Waldram Tools for AutoCAD®) to run the calculations recommended in the BRE guide.

8.10. 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.

9. Baseline conditions for neighbouring properties

Daylight and sunlight to neighbouring properties

9.1. We assessed the daylight and sunlight levels to the neighbouring properties in the existing baseline condition shown in our location plan drawing no. LOC-DS-001 at Appendix 2. The relevant windows are shown on the window location drawings LOC-001 to LOC-006, also at Appendix 2. The neighbouring buildings/properties that were assessed are listed in Table 4 below.

9.2. In total, 342 windows serving 141 rooms in six buildings were assessed for daylight and 85 rooms in three buildings were assessed for sunlight.

9.3. The daylight and sunlight levels in the existing baseline condition are shown in the results tables at Appendix 3 in the columns headed "Exis." (being an abbreviation of "Existing").

9.4. Table 4 below summarises the number of windows and rooms assessed in each neighbouring building/property, and the number inside the BRE guidelines in the existing baseline condition.

***Table 4** - Summary of adherence to BRE daylight and sunlight targets in existing baseline condition*

Property address	VSC		NSL		APSH (room)			
	No. of windows tested	No. inside VSC guideline	No. of rooms tested	No. inside NSL guideline	No. of rooms tested	No. inside annual & winter guidelines	No. inside annual guideline	No. inside winter guideline
Pendrell House, New Compton Street	95	6	40	2	40	19	19	19
45 New Compton Street	32	5	24	6	24	11	17	12
167-177 Shaftesbury Avenue	26	23	26	22	16	15	16	15
172-176 Shaftesbury Avenue (hotel)	71	2	35	0	2	2	2	2
166-170 Shaftesbury Avenue	24	4	12	0	-	0	0	0
166A Shaftesbury Avenue (church)	94	0	4	2	3	3	3	3
Totals:	342	40	141	32	85	50	57	51
		12%		23%		59%	67%	60%

9.5. In the baseline condition, the BRE recommended targets for daylight (27% VSC and 80% NSL) are met for 40 windows (12%) and 32 rooms (23%) respectively, and the sunlight recommended targets (25% APSH including 5% APSH in winter) are met for 50 rooms (59%). This level of adherence to the BRE recommended targets in the existing baseline condition is symptomatic of the built-up nature of the existing environment in which the Site sits.

Sunlight to neighbouring amenity areas

9.6. We assessed sunlight to the neighbouring amenity areas in Phoenix Community Gardens and St Giles' Churchyard to the northwest of the Site. We assessed St Giles' Playground separately from the rest of the churchyard.

9.7. The area of each amenity space that can receive at least two hours of sunlight on 21 March in the existing baseline condition is shown graphically on drawing no. SOG-001 at Appendix 4 and quantified in Table 5 below. In the baseline condition, all three amenity spaces comfortably satisfy the BRE recommended target at least two hours of sunlight on 21 March to at least 50% of the area.

***Table 5** - Summary of adherence to BRE sun-on-ground target in existing baseline condition*

Name \ level \ ref.	Area (m²)	Area sunlit >2hrs (m²)	Proportion sunlit >2hrs	Meets BRE?
A01 – Phoenix Community Gardens	1,280.0	982.5	77%	Yes
A02 – St Giles' Playground	447.8	396.2	88%	Yes
A03 – St Giles' Churchyard	1,500.1	1,339.3	89%	Yes

10. Effects of the proposed development on neighbouring properties

10.1. The proposed development scenario is illustrated on drawing no. PRO-001 at Appendix 2.

10.2. 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 numerical guidelines are identified in red font.

Daylight to neighbouring properties

10.3. The results of the VSC and NSL analyses of the neighbouring buildings/properties are tabulated in Appendix 3 and summarised in Table 6 and Table 7 below.

Table 6 – Summary of VSC impacts to neighbouring windows

Property address	No. of windows tested	VSC (windows)				
		No. windows inside guidelines	No. windows outside guidelines			
			Low reduction	Medium reduction	High reduction	Sub-total
Pendrell Hse, New Compton St	95	40	68	23	2	2
45 New Compton St	32	24	32	-	-	-
167-177 Shaftesbury Ave	26	26	26	-	-	-
172-176 Shaftesbury Ave (hotel)	71	35	71	-	-	-
166-170 Shaftesbury Ave	24	12	24	-	-	-
166A Shaftesbury Ave (church)	94	4	94	-	-	-
Totals:	**342**	**315**	23	2	2	27
		92%	*7%*	*1%*	*1%*	*8%*

Table 7 - Summary of NSL impacts to neighbouring rooms

Property address	No. of rooms tested	NSL (rooms)				
		No. rooms inside guidelines	No. rooms outside guidelines			
			Low reduction	Medium reduction	High reduction	Sub-total
Pendrell Hse, New Compton St	40	23	7	6	4	17
45 New Compton St	24	24	-	-	-	-
167-177 Shaftesbury Ave	26	26	-	-	-	-
172-176 Shaftesbury Ave (hotel)	35	33	2	-	-	2
166-170 Shaftesbury Ave	12	11	-	1	-	1
166A Shaftesbury Ave (church)	4	4	-	-	-	-
Totals:	141	121	9	7	4	20
		86%	*6%*	*5%*	*3%*	*14%*

10.4. In the proposed development condition, the daylight impacts would be inside the BRE guidelines to 315 out of 342 windows (92%) for VSC and 121 out of 141 rooms (86%) for NSL.

10.5. Any daylight impacts on the following three buildings would be fully inside the BRE guidelines (VSC and NSL):

- 45 New Compton Street (flats)
- 167-177 Shaftesbury Avenue (flats)
- 166A Shaftesbury Avenue (church)

10.6. The remaining three buildings would experience VSC and/or NSL impacts outside the BRE guidelines. These are examined in more detail below.

Pendrell House, New Compton Street (flats)

10.7. Pendrell House is a social housing block on the northwest side of New Compton Street opposite the Site. It is owned by Soho Housing Association and contains 25 flats.

10.8. Camden Council's online planning records do not contain any planning records for Pendrell House, so we were unable to obtain floor plans. Nor could we find plans through general online research. We therefore used our expertise to deduce rooms uses and likely room sizes based on careful visual inspection from the upper floor levels within our client's building and from the public realm.

10.9. The design of the social housing block addresses its dense urban environment, by apparently locating most of its main living rooms and balconies away from New Compton Street and facing out over the green spaces of St Giles Churchyard and Phoenix Gardens. The rooms facing the Site appear to be predominantly bedrooms and kitchens, some of which sit beneath deck access balconies or canopies.

Figure 4 – Aerial view of Pendrell House adjacent to open green spaces

Figure 5 – Street view looking northeast on New Compton Street - Pendrell House (left) and the Site (right)

Figure 6 – Street view looking southwest on New Compton Street - Pendrell House (right) and the Site (left)

10.10. Of the 95 windows tested for VSC, 69 (72%) will be inside the BRE guidelines. The impacts on the remaining windows would be low magnitude to 23 windows, medium magnitude to two windows and high magnitude to two windows.

10.11. Of the 40 rooms tested for NSL, 23 (58%) will be inside the BRE guidelines. The impacts on the remaining rooms would be low magnitude to seven rooms, medium magnitude to six rooms and high magnitude to four rooms.

10.12. Of the 27 windows with VSC impacts outside the BRE numerical guidelines, five serve living rooms, 21 serve bedrooms, and one serves a room of unknown use. Of the 17 rooms with NSL impacts

outside the BRE numerical guidelines, one is a kitchen, one is of unknown use, and the remaining 15 are bedrooms.

10.13. Taking the living rooms first, it is the corner living room at the southern end of the building on each floor from ground to fourth floor level that would be affected. However, in each case it would be a low magnitude impact (0.75-0.76 times former value) affecting the small secondary window on New Compton Street. The VSC impacts on the large, curved bay window and other secondary window fronting St Giles Passage would be inside the guidelines, and the NSL would be unaffected. The impact on living rooms would therefore be negligible overall.

10.14. Turning next to the bedrooms, out of 23 bedrooms assessed, 18 would have either VSC or NSL impacts outside the guidelines. The VSC impacts would be low magnitude to 16 bedrooms, medium magnitude to one bedroom and high magnitude to one bedroom. The NSL impacts would be low magnitude to seven bedrooms, medium magnitude to six bedrooms, high magnitude to two bedrooms, and negligible (within the guidelines) to the three bedrooms.

10.15. The remaining impacts are to a fourth-floor kitchen (R4), which is heavily recessed beneath a deck access balcony, and a fifth-floor room of unknown use (R4), which is beneath a projecting canopy.

10.16. When determining whether the daylight impacts would cause unacceptable harm to amenity it is necessary to consider the following factors:

a) The building has been designed for its dense urban context, with its main living rooms and balconies primarily located away from New Compton Street and facing out over the green spaces of St Giles Churchyard and Phoenix Gardens.

b) The vast majority of affected rooms are bedrooms, which have a lower requirement for daylight and are considered a low sensitivity receptor.

c) There would be negligible impact on living rooms.

d) The affected kitchen and room of unknown use are recessed beneath a deck access balcony and projecting canopy respectively, which restrict the available view of sky and make larger relative reductions unavoidable.

e) The elevation facing the Site is built on the back edge of pavement on the opposite side of a narrow street taking most of its light from over the Site. In such circumstances a greater degree of relative light loss is to be expected.

10.17. Having considered these factors, it is submitted that the daylight impacts would not cause unacceptable harm to amenity to the occupiers of Pendrell House.

172-176 Shaftesbury Avenue (hotel)

10.18. Opposite the Site, the Covent Garden Hotel occupies 172-176 Shaftesbury Avenue and 6-10 Monmouth Street.

10.19. Although it is a non-residential property, we included it in our assessment for completeness. We have treated it a low-sensitivity receptor.

10.20. The VSC impacts to all 71 windows tested will be inside the BRE guidelines. Of the 35 rooms tested for NSL, 33 (94%) will be inside the BRE guidelines. The impacts on NSL to the two remaining rooms would be low magnitude (0.74-0.79 times former value).

10.21. The two rooms concerned (R8 and R9 at third floor level) are bedrooms lit by dormer windows in the mansard roof. Such design features limit the penetration of daylight around the room and increase sensitivity to changes in massing on the Site. Nevertheless, the windows would retain VSC values of 16.8% to 18.0%, which are reasonable for an urban area.

166-170 Shaftesbury Avenue (flats)

10.22. This building, which is opposite the Site, contains flats above the restaurant at ground floor level. We have based our understanding of the internal layouts and room uses at first to third floor levels on a planning consented first floor plan and site observations. We have been unable to determine room uses at fourth and fifth floor levels.

10.23. The VSC impacts to all 24 windows tested will be inside the BRE guidelines. Of the 12 rooms tested for NSL, 11 (92%) will be inside the BRE guidelines. The impact on NSL to the one remaining room would be medium magnitude (0.67 times former value).

10.24. The room concerned (R4 at fourth floor level) is lit by a very deep dormer window in the mansard roof. Such design features limit the penetration of daylight around the room and increase sensitivity to changes in massing on the Site. Nevertheless, the window would retain 17.4% VSC, which is reasonable for an urban area.

Sunlight to neighbouring properties

10.25. The results of the annual and winter sunlight analyses are tabulated in Appendix 3 and summarised in Table 8 below.

Table 8 - Summary of APSH impacts to neighbouring rooms

Property address	No. of rooms tested	No. inside annual & winter guidelines	APSH - annual (rooms)				APSH - winter (rooms)			
			No. outside annual guidelines				No. outside winter guidelines			
			Low reduction	Medium reduction	High reduction	Sub-total	Low reduction	Medium reduction	High reduction	Sub-total
Pendrell Hse, New Compton St	40	29	5	2	2	9	-	3	5	8
45 New Compton St	24	24	-	-	-	-	-	-	-	-
167-177 Shaftesbury Ave	16	16	-	-	-	-	-	-	-	-
172-176 Shaftesbury Ave (hotel)	2	2	-	-	-	-	-	-	-	-
166-170 Shaftesbury Ave	-	-	-	-	-	-	-	-	-	-
166A Shaftesbury Ave (church)	3	3	-	-	-	-	-	-	-	-
Totals:	85	74	5	2	2	9	0	3	5	8
		87%	*6%*	*2%*	*2%*	*11%*	*0%*	*4%*	*6%*	*9%*

10.26. In the proposed development condition, the sunlight impacts would be fully inside the BRE guidelines (annual and winter sunlight) to 74 out of 85 rooms (87%).

10.27. Any sunlight impacts on the following five buildings would be fully inside the BRE guidelines (annual and winter sunlight):

- 45 New Compton Street (flats)
- 167-177 Shaftesbury Avenue (flats)
- 172-176 Shaftesbury Avenue (hotel)
- 166-170 Shaftesbury Avenue (flats)
- 166A Shaftesbury Avenue (church)

10.28. The only building that would experience sunlight impacts outside the BRE guidelines is Pendrell House (flats) on New Compton Street. These impacts are examined in more detail below.

Pendrell House, New Compton Street (flats)

10.29. Of the 40 rooms tested for sunlight, 31 (78%) will be inside the BRE guidelines for annual sunlight, 32 (80%) for winter sunlight, and 29 (73%) for both annual and winter sunlight.

10.30. Of the 11 affected rooms, eight are bedrooms, which do not require assessment for sunlight and can therefore be ignored. The remaining three are living rooms at the northern end of the building at first, second and third floor levels.

10.31. The first floor living room (R11) would incur a small impact on annual sunlight (0.77 times former value) and a larger relative impact on winter sunlight (0.5 times former value). Nevertheless, the retained values of 20% APSH, including 3% in the winter months, are reasonable for an urban area.

10.32. The second and third floor living rooms (R9) would meet the annual sunlight guideline and winter sunlight would reduce to 0.57-0.67 times former value. That said, the absolute loss of winter sunlight (2-3% APSH) would be small and the retained values of 25%-30% APSH, including 4% in the winter months, are good for an urban area.

10.33. It is submitted that the sunlight impacts would not cause unacceptable harm to amenity to the occupiers of Pendrell House.

Sunlight to neighbouring amenity areas

10.34. The results of the two-hour sun-on-ground assessment are shown graphically on drawing no. SOG-001 at Appendix 4 and quantified in Table 9 below. The final three columns of the table confirm the proportion of each amenity area that would retain at least two hours of sunlight on 21 March in the proposed condition, the factor of former value, and whether the results meet the BRE numerical guidelines (i.e., at least 50% or at least 0.80 times former value).

***Table 9** - Sun-on-ground impacts to neighbouring amenity areas*

Name \ level \ ref.	Area (m²)	Area sunlit >2hrs (m²)		Proportion sunlit >2hrs		Pro./Ex. ratio	Meets BRE?
		Existing	Proposed	Existing	Proposed		
A01 – Phoenix Gardens	1,280.0	982.5	985.9	77%	77%	1.00	Yes
A02 – St Giles' Playground	447.8	396.2	396.4	88%	88%	1.00	Yes
A03 – St Giles' Churchyard	1,500.1	1,339.3	1,339.1	89%	89%	1.00	Yes

10.35. All three amenity areas would satisfy the BRE guidelines for sun on ground.

10.36. The proposed development would not result in any reduction in the two-hours sunlit area on 21 March of any of these amenity areas.

Cumulative effects of the proposed developments of the Site and the former Saville Theatre

10.37. We have carried out a qualitative assessment of potential cumulative effects of the proposed development of the Site in combination with the recently submitted development proposal for the former Saville Theatre, 135-149 Shaftesbury Avenue, which is illustrated in Figure 3 on page 19. We have reviewed the results of our assessment and those of the assessment submitted with planning application reference 2024/0993/P and used professional judgment to comment on the potential cumulative effects, which we set out below.

10.38. The *Daylight and Sunlight Report* for the Saville Theatre development submitted with planning application reference 2024/0993/P is dated January 2024 and was prepared by Point 2 Surveyors.

10.39. It was scoped to assess daylight and sunlight impacts on the surrounding properties identified on the plan in *Figure 7* adjacent, plus the effects on sunlight to the open amenity spaces known as Phoenix Community Gardens, St Giles' Playground, and St Giles' Churchyard.

10.40. We have considered potential cumulative effects on:

- Pendrell House, New Compton St.
- 166-170 Shaftesbury Avenue
- 166a Shaftesbury Avenue (church)
- Open amenity spaces

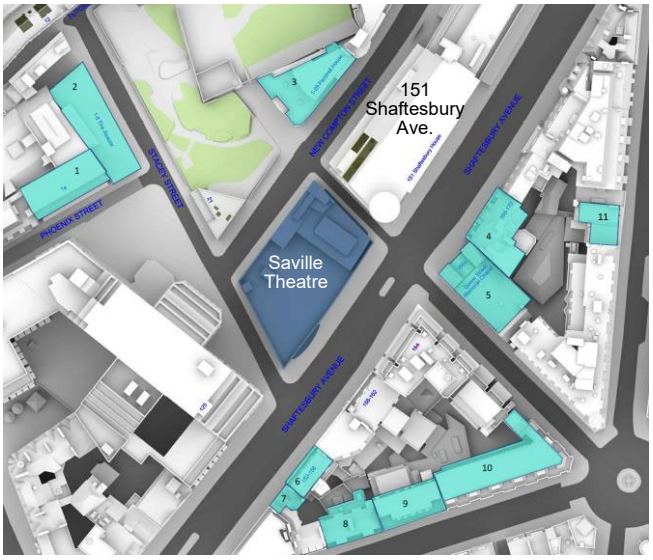


Figure 7 – Properties assessed for the Saville Theatre development

Cumulative daylight and sunlight effects

Pendrell House, New Compton Street

10.41. There is some potential for cumulative daylight and sunlight effects on Pendrell House, mainly to windows and rooms on the southerly half of the New Compton Street elevation.

10.42. Windows that would experience VSC impacts outside BRE numerical guidelines as a result of either of the two developments in isolation are identified in Figure 8 below with coloured outlines (cyan = Saville Theatre, yellow = 151 Shaftesbury Avenue).

Figure 8 – Pendrell House. Windows with potential VSC impacts beyond BRE guidelines are outlined in colour: cyan = Saville Theatre, yellow = 151 Shaftesbury Avenue

10.43. The impacts from the proposed development at 151 Shaftesbury Avenue in isolation would mostly be small (0.70 to 0.76 times former value) apart from larger impacts to two first-floor bedrooms (W5 to W7) and one fifth-floor room (W5).

10.44. In a cumulative scenario there is potential for some of the combined VSC and NSL impacts to be of a magnitude greater than from each development in isolation. Apart from the stack of main living rooms on the corner of the building (which should retain mean VSCs in the mid-teens or higher in the cumulative scenario), the remaining rooms with potential cumulative effects are thought to be bedrooms.

10.45. For sunlight, the only main living rooms in the southerly half of the New Compton Street elevation are those on the corner of the building served by the curved bay windows seen in Figure 8 above. The results of our assessment show that the proposed development would not cause any reduction in their sunlight (APSH). Therefore, in a cumulative scenario the combined sunlight impacts should be no greater than from each development in isolation, with any sunlight effects being attributable to the Saville Theatre development.

166-170 Shaftesbury Avenue

10.46. The only daylight impact on 166-170 Shaftesbury Avenue from the proposed development of 151 Shaftesbury Avenue in isolation that would be outside the BRE guidelines is a singular NSL impact to a fourth-floor room (R4) served by a dormer window. This is identified in Figure 9 with a yellow outline. All VSC impacts and all other NSL impacts would be inside the BRE guidelines and negligible, ranging from 0.85 to 0.93 times former value for VSC and 0.81 to 1.03 times former value for NSL.

10.47. The windows that would experience VSC impacts outside BRE numerical guidelines from the Saville Theatre development in isolation are identified in Figure 9 with a cyan outline. In each case, they would be small impacts, ranging from 0.70 to 0.79 times former value. There would also be NSL impacts to six rooms, ranging from 0.48 to 0.61 times former value.

10.48. In a cumulative scenario there is potential for some of the combined VSC and NSL impacts to be of a slightly magnitude greater than from each development in isolation.

10.49. Sunlight is not an issue, because the windows do not face within 90 degrees of due south.

Figure 9 – 166-170 Shaftesbury Ave.

166a Shaftesbury Avenue (church)

10.50. The proposed development of 151 Shaftesbury Avenue would cause negligible daylight impact on 166-170 Shaftesbury Avenue in isolation: VSC impacts would range from 0.91 to 1.00 times former value and there would be no impact on NSL.

10.51. Therefore, in a cumulative scenario the combined daylight impacts should not be materially greater than from each development in isolation, with any material daylight effects being attributable to the Saville Theatre development.

10.52. Sunlight is not an issue, because the windows facing 151 Shaftesbury Avenue do not face within 90 degrees of due south.

Cumulative sunlight effects to neighbouring amenity areas

10.53. The proposed development of 151 Shaftesbury Avenue would cause negligible sunlight impact to the three neighbouring amenity spaces (Phoenix Community Gardens, St Giles' Playground, and St Giles' Churchyard) in isolation, with no reduction in the areas receiving two hours of sunlight on 21 March.

10.54. Therefore, in a cumulative scenario the combined sunlight impacts should not be materially greater than from each development in isolation, with any material sunlight effects being attributable to the Saville Theatre development.

11. Conclusion

11.1. The Site is in an urban location within London's Central Activities Zone, the Tottenham Court Road Opportunity Area, and London Borough of Camden's Central London area. It is therefore in an area where taller, higher density development and a greater degree of obstruction is to be expected.

11.2. We assessed the potential effects of the proposed development on daylight and sunlight to for surrounding residential buildings containing multiple flats, and on sunlight to public outdoor amenity areas. For completeness, we also assessed a church and a hotel on the opposite side of Shaftesbury Avenue, despite their non-residential use. We have treated them as low-sensitivity receptors.

11.3. We ran our assessments using methodologies recommended in the BRE guide. The advice contained in the BRE guide is not mandatory and its numerical guidelines should be interpreted flexibly, as confirmed in numerous appeal decisions.

11.4. The proposed development shows a high level of adherence to BRE numerical guidelines, with 92% of windows meeting VSC guidelines, 86% of rooms meeting NSL guidelines, 87% of rooms meeting sunlight guidelines, and all outdoor amenity areas meeting the sun-on-ground guidelines. Most of the daylight and sunlight impacts that would be outside the guidelines are low magnitude and most of them affect bedrooms, which are less sensitive receptors.

11.5. There would be a limited number of higher magnitude impacts, which are generally confined to Pendrell House on New Compton Street. This social housing block has been designed with its urban location in mind by apparently placing most of its main living rooms and balconies facing the green spaces of St Giles Churchyard and Phoenix Gardens and locating predominantly bedrooms and kitchens facing the Site. Some of these sit beneath deck access balconies or canopies.

11.6. Having considered these and other factors, including the retained levels of daylight and sunlight, we submit that the proposed development would not cause unacceptable harm to amenity to the occupiers of any of the surrounding buildings or users of the nearby public outdoor amenity areas.

11.7. We have undertaken a qualitative assessment of potential cumulative daylight and sunlight effects of the proposed development and the Saville Theatre development together. To a limited extent, there is some potential for cumulative daylight impacts on Pendrell House and 166-170 Shaftesbury Avenue.

11.8. 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.

Delva Patman Redler

Delva Patman Redler LLP
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.

Sunlight to neighbouring gardens and amenity spaces

13. Sunlight should be assessed on the equinox (21 March) to main back gardens of houses, allotments, parks and playing fields, children's playgrounds, outdoor swimming pools, sitting-out areas, such as in public squares and focal points for views, such as a group of monuments or fountains.

14. The assessment measures the percentage of each area that can receive at least two hours of sunlight on 21 March - the 'two-hours sun-on-ground' (**SOG**) test.

15. It is recommended that at least half of the area of a garden or amenity space should be able to receive at least two hours of sunlight on 21 March. If such a space is already heavily obstructed, then any further loss of sunlight should be kept to a minimum. In this poorly sunlit case, if, following development, the area which can receive two hours of direct sunlight on 21 March is reduced to less than 0.80 times its former size, this loss of sunlight is likely to be noticeable. In such cases the garden or amenity area will tend to look more heavily overshadowed.

16. Sunlight at an altitude of 10° or less is ignored, because it is likely to be blocked by planting, and fences or walls less than 1.5 metres high can also be ignored. Front gardens, driveways and hard standing for cars are usually omitted. Normally, trees and shrubs need not be included, partly because their shapes are almost impossible to predict, and partly because the dappled shade of a tree is more pleasant than a deep shadow of a building.

Glossary of terms

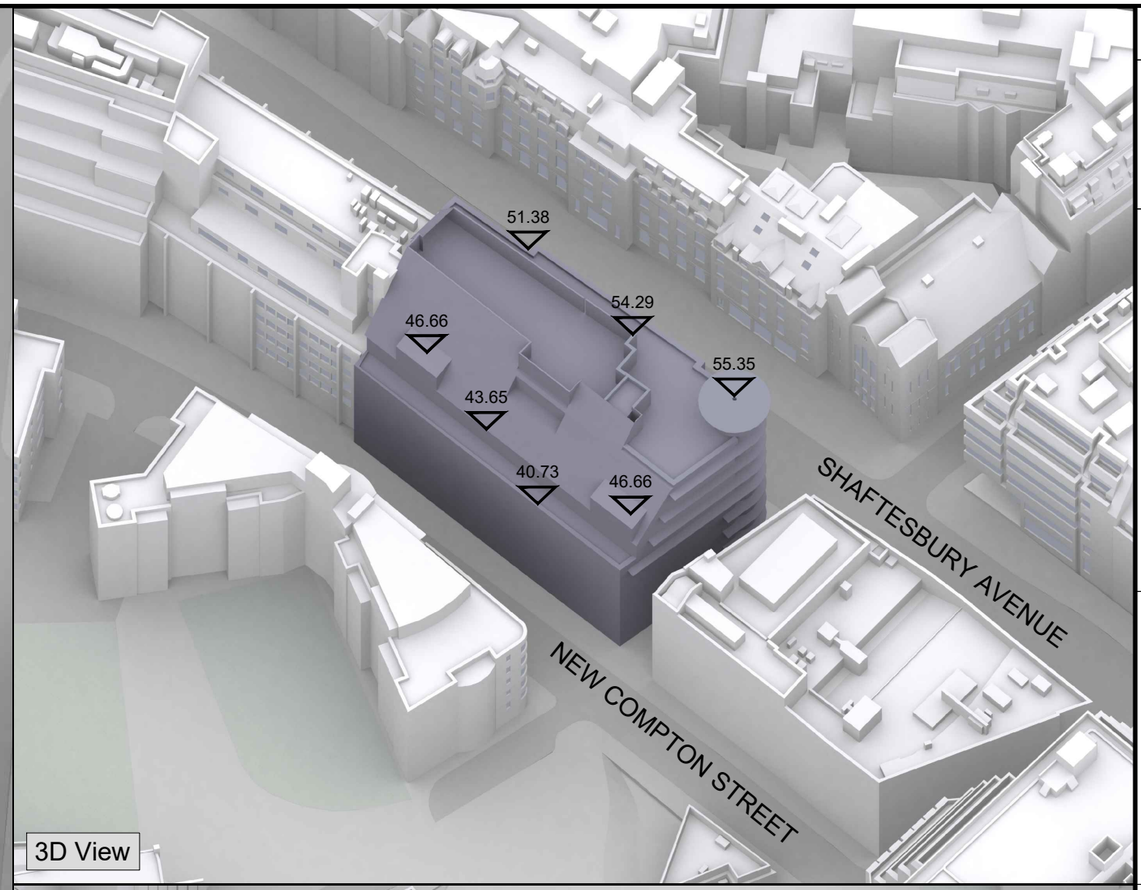
17. The daylight and sunlight terminology used in our report is explained below.

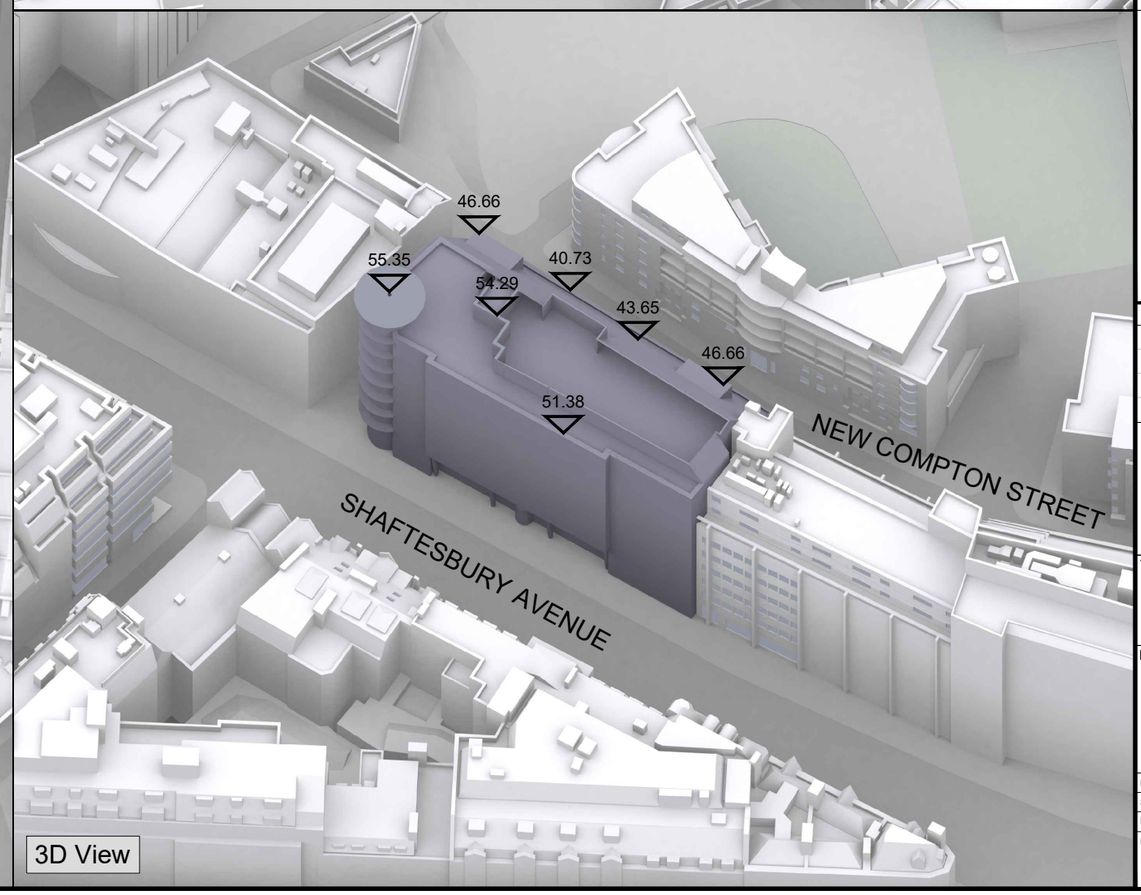
Term	Meaning
Annual probable sunlight hours (**APSH**)	The long-term average of the total number of hours during a year in which direct sunlight is expected to shine on the unobstructed ground, allowing for average levels of cloudiness for the location in question.
Daylight	Combined skylight and sunlight.
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 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

Existing and proposed plan & 3D views drawings
Location plan
Window location drawings





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Proposed	Cumulative
Neighboring Property	Cutback Envelope

SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS:
Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

NOTES:

All heights given in m AOD

REV	Description	Drawn	Date

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TITLE:

151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:

EXISTING SCENARIO

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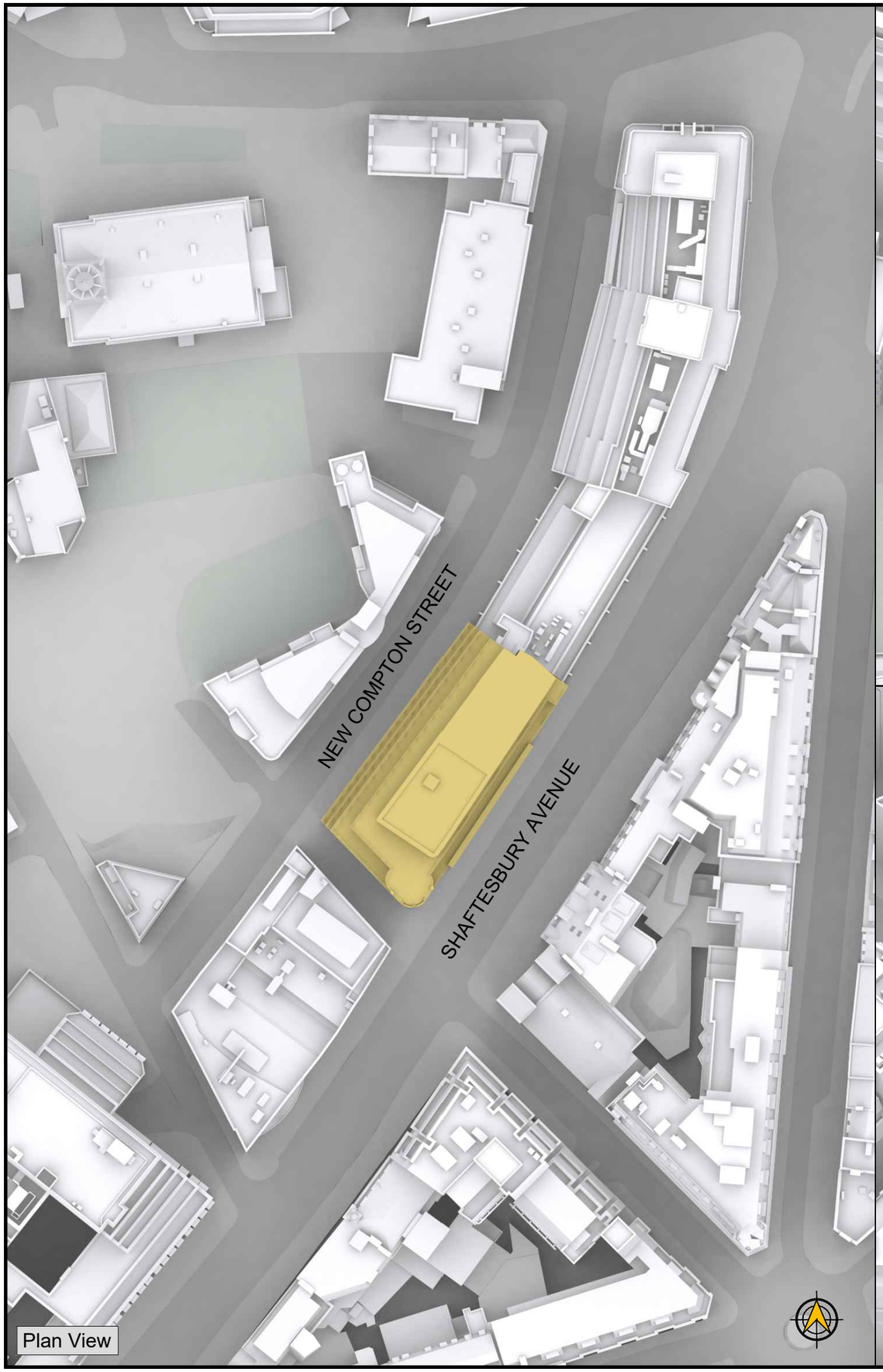

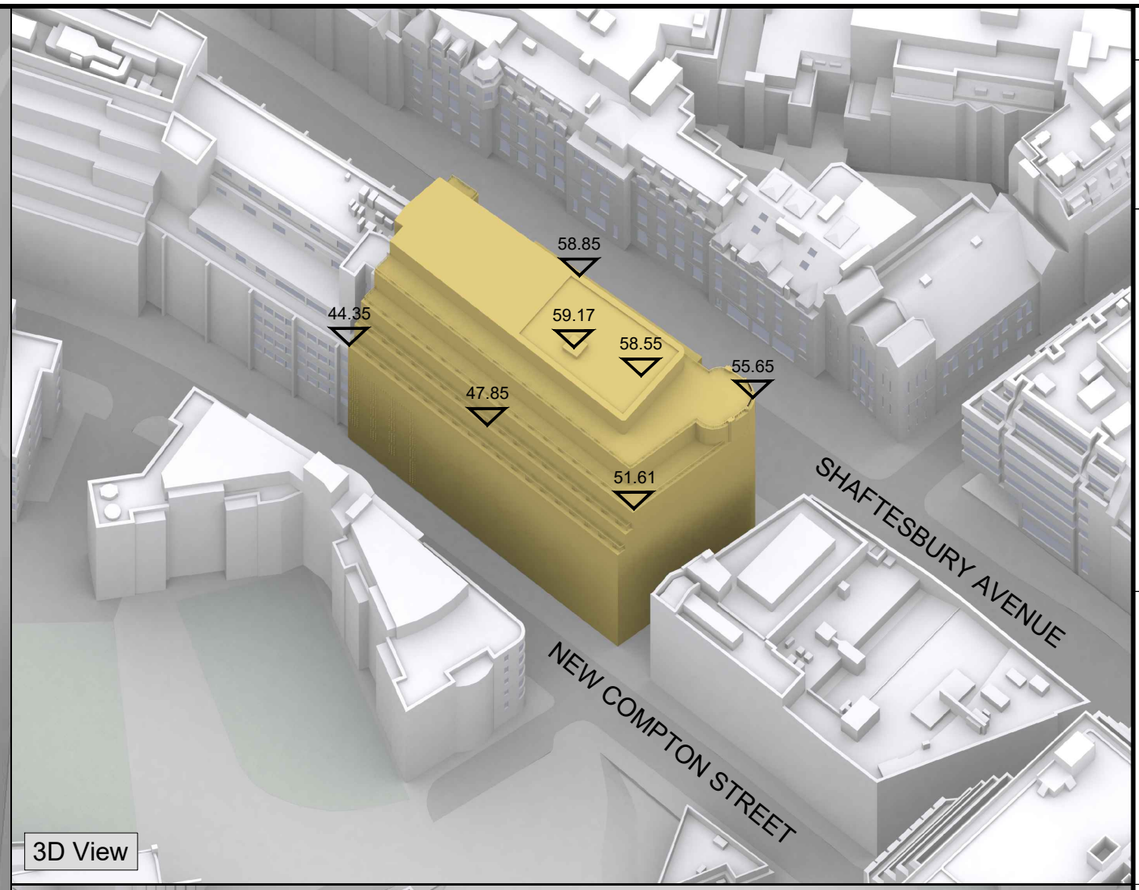

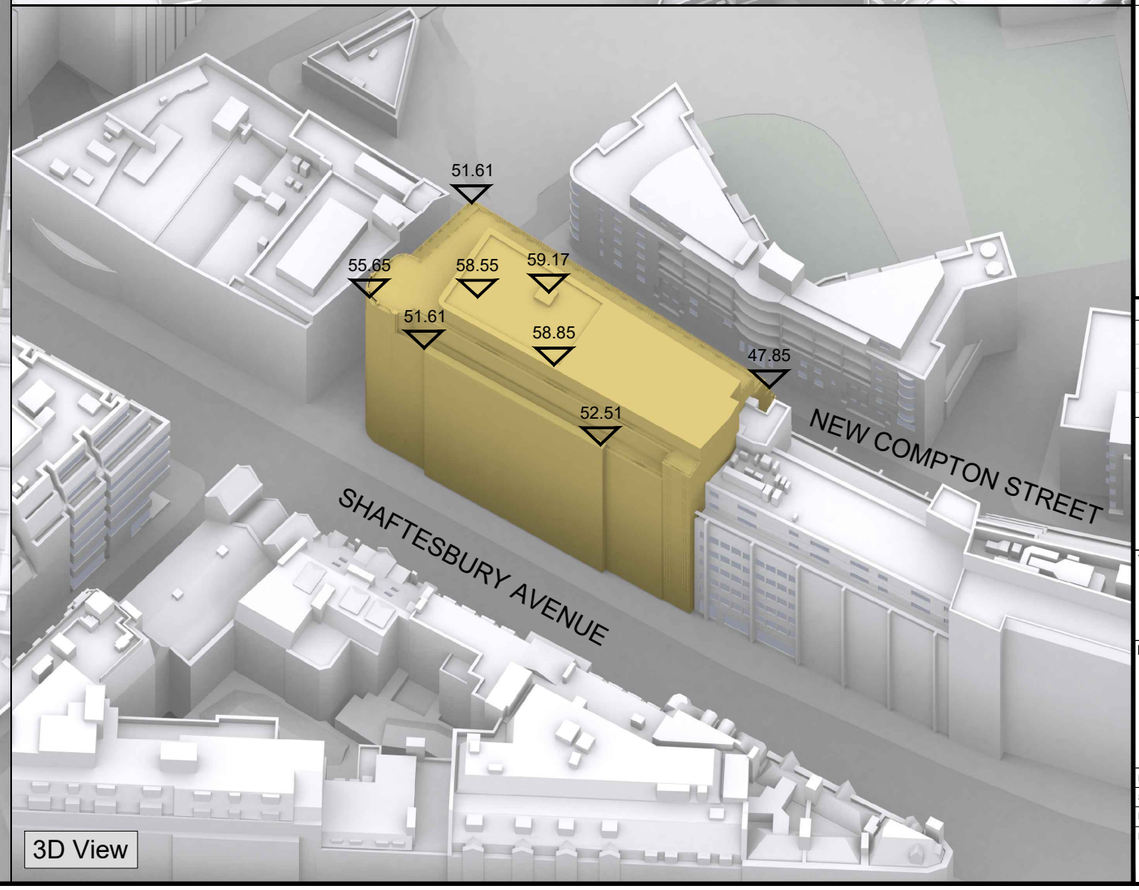

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- Cumulative
- Cutback Envelope

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ABC Survey received on 09/05/2022

PROPOSED BUILDINGS:
BGY Architects
Model Received on 31/01/2024
240131_151 Shaftesbury Ave

NOTES:

All heights given in m AOD

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PROPOSED SCENARIO

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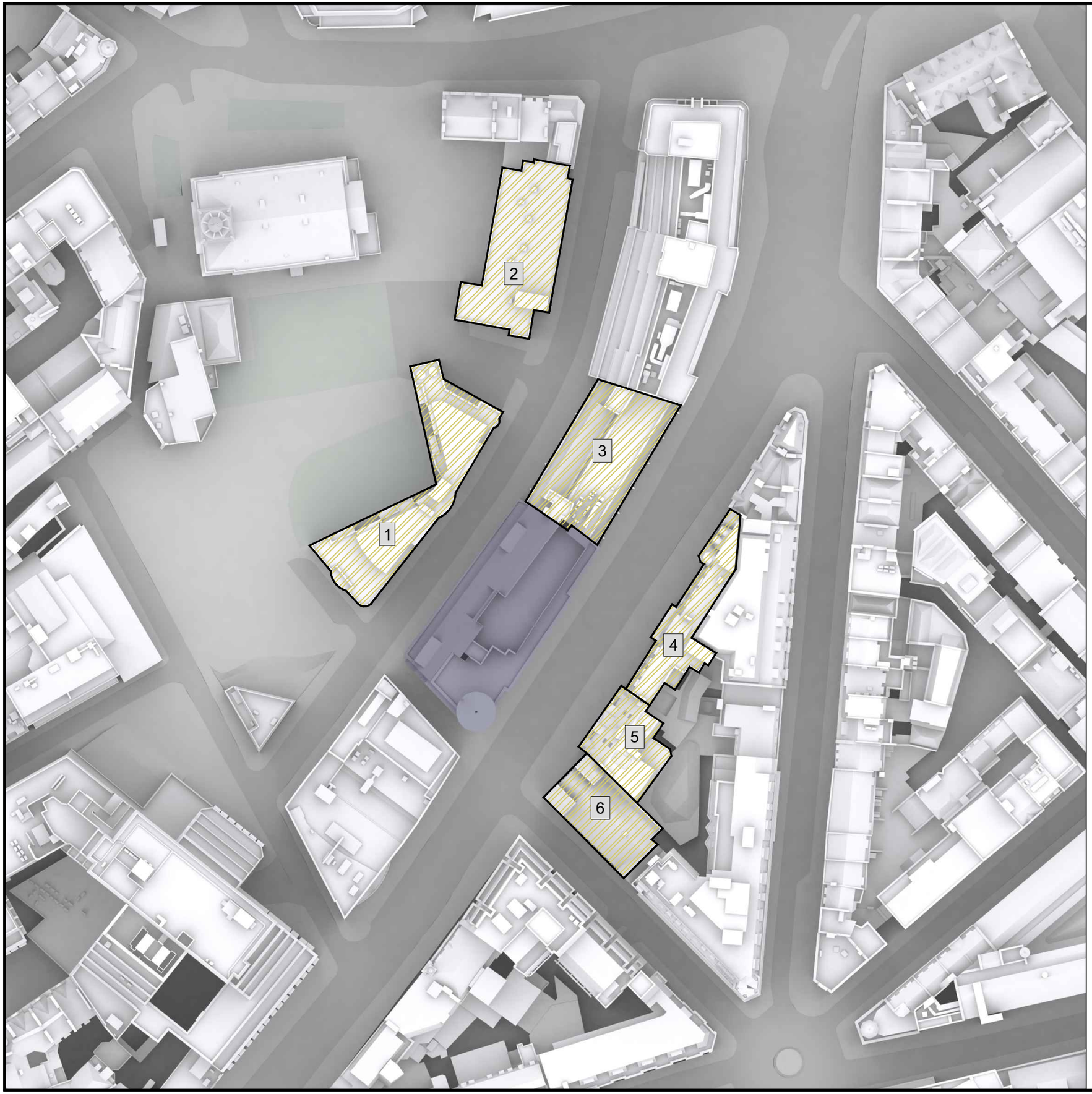

NEIGHBOURING PROPERTIES CONSIDERED FOR ANALYSIS

1: Pendrell House:
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2: 45 New Compton Street:
Dwg No: 23555-LOC-002

3: 167-177 Shaftesbury House
Dwg No: 23555-LOC-003

4: 172-176 Shaftesbury House:
Dwg No: 23555-LOC-004

5: 166-170 Shaftesbury House:
Dwg No: 23555-LOC-005

6: 166A Shaftesbury House:
Dwg No: 23555-LOC-006

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- Consented
- Proposed
- Cumulative
- Neighboring Property
- Cutback Envelope

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ABC Survey received on 09/05/2022

NOTES:

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DRAWING:
LOCATION PLAN
Neighbouring Properties

DRAWN: MZB	JOB NBR: 23555
SCALE: NTS	
DATE: 02/01/2024	

DWG NO:	REV:
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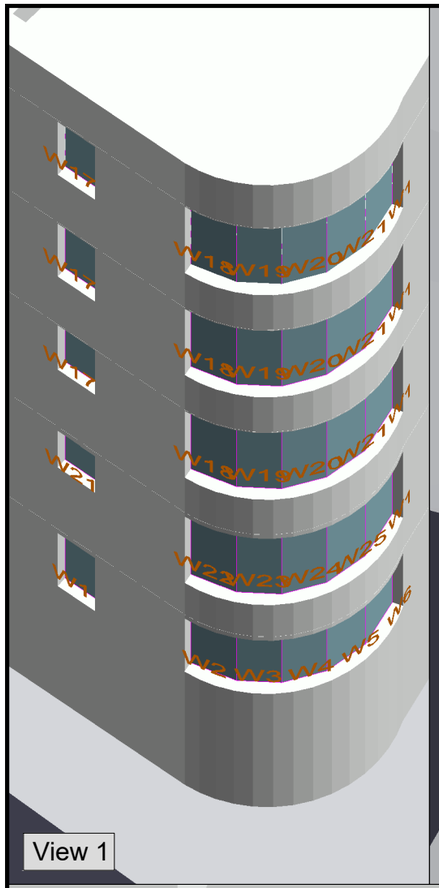

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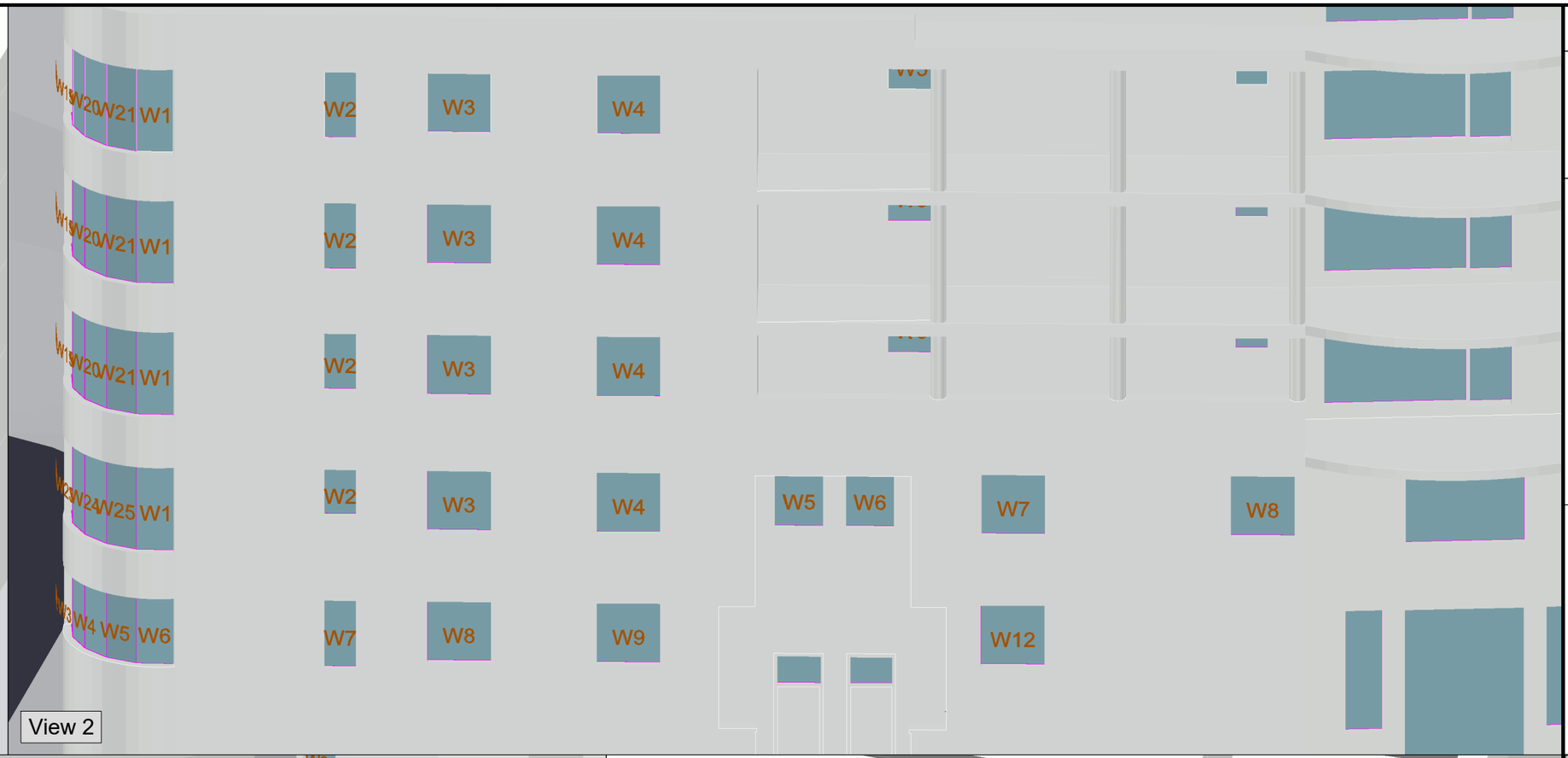

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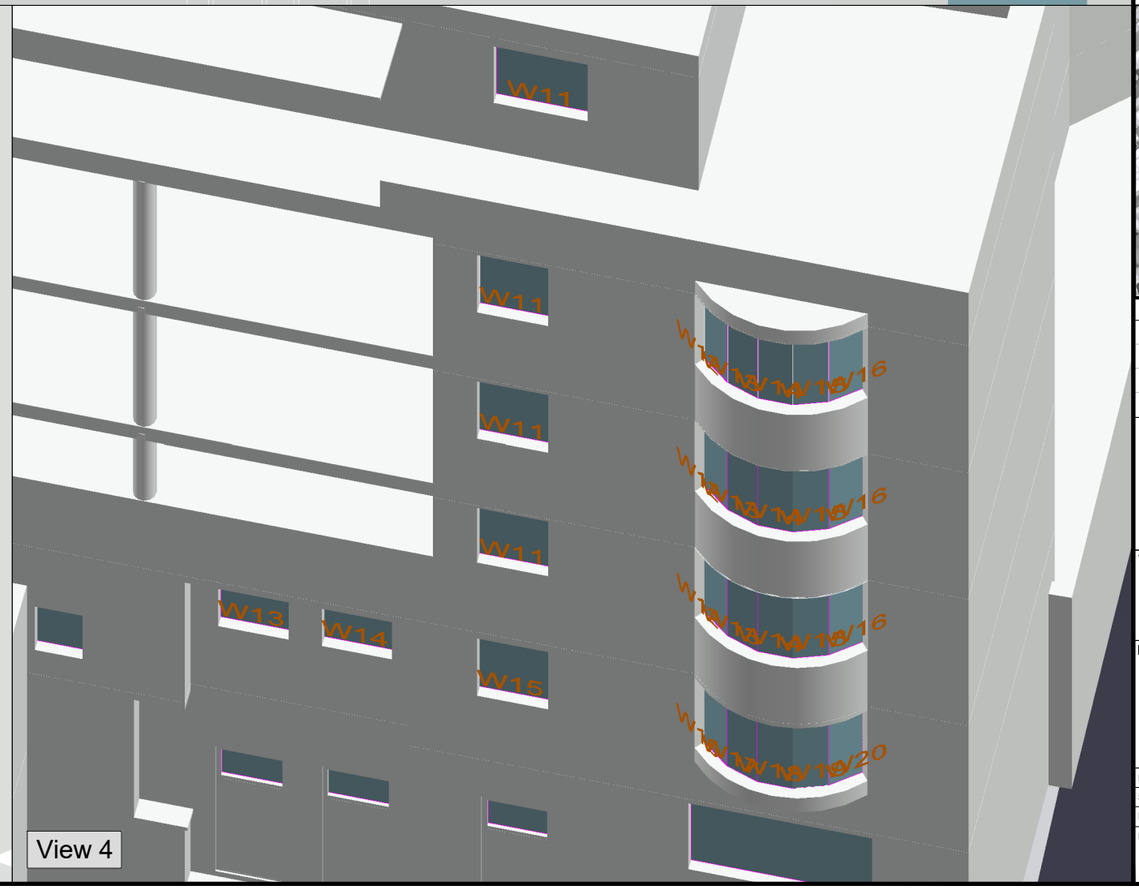
View 3



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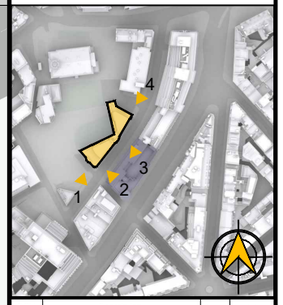

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151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:
KEY WINDOW LOCATIONS
Pendrell House

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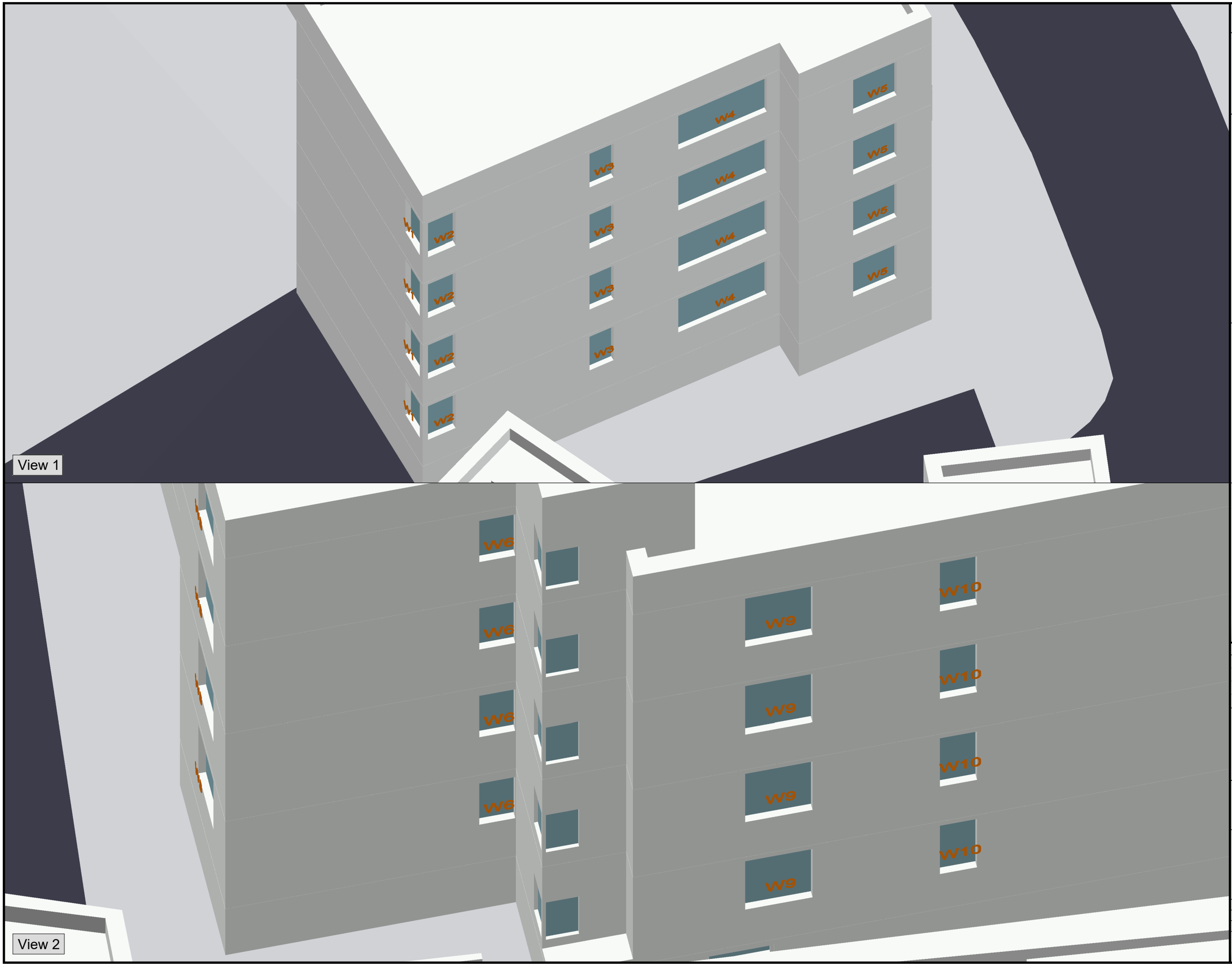
DATE: 02/01/2024	
DWG NO: LOC-001	REV: -



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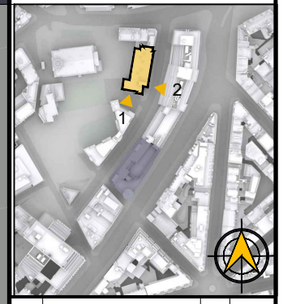

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151 SHAFTESBURY AVENUE
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WC2H 8AL

DRAWING:

KEY WINDOW LOCATIONS
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SCALE: NTS	
DATE: 02/01/2024	
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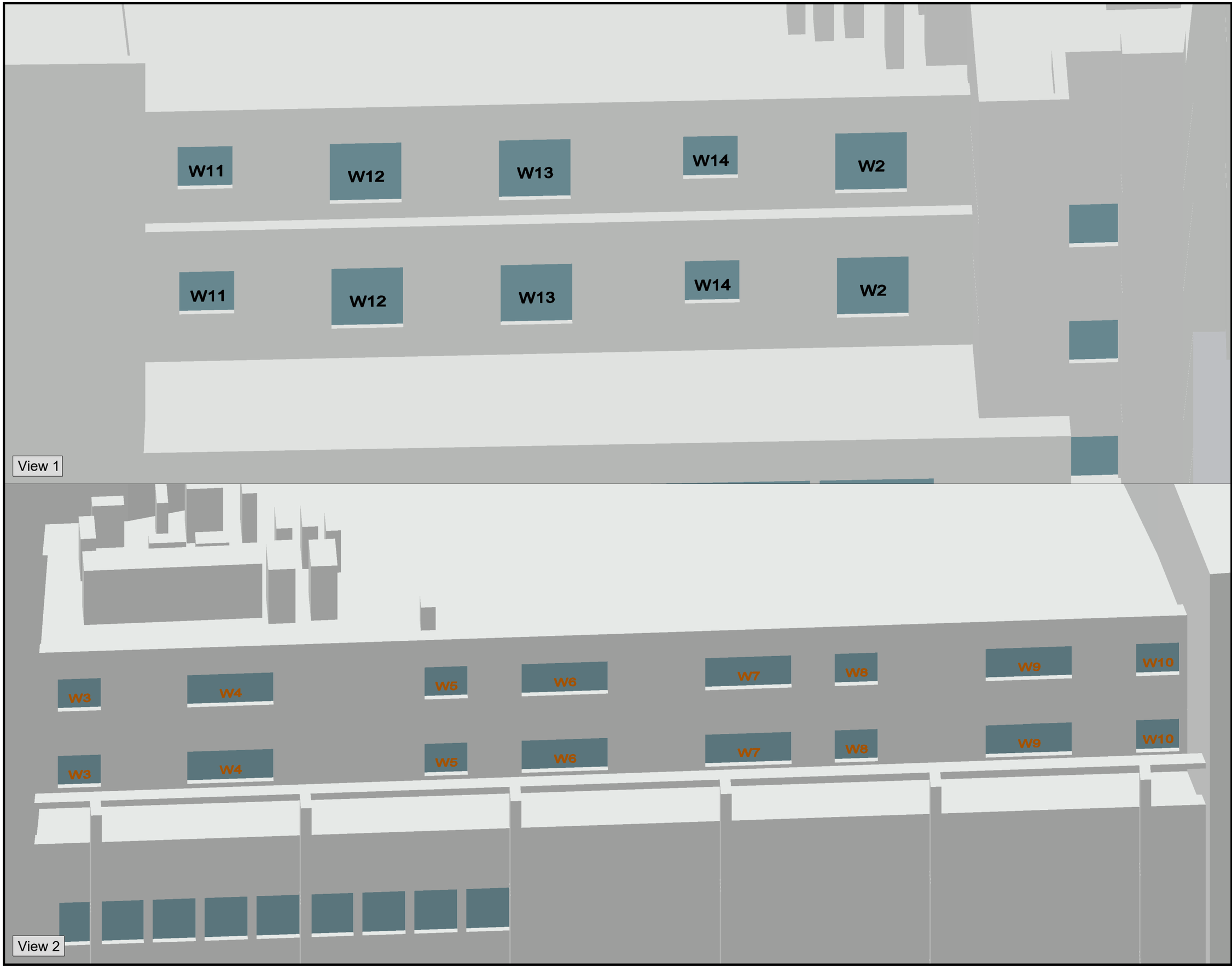

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ABC Survey received on 09/05/2022

NOTES:

REV	Description	Drawn	Date

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151 SHAFTESBURY AVENUE
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DRAWING:

KEY WINDOW LOCATIONS
167-177 Shaftesbury Avenue

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DATE: 02/01/2024	
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ABC Survey received on 09/05/2022

NOTES:

REV	Description	Drawn	Date

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LONDON
WC2H 8AL

DRAWING:

KEY WINDOW LOCATIONS
172-176 Shaftesbury Avenue

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SCALE: NTS	
DATE: 02/01/2024	
DWG NO: LOC-004	REV: -

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KEY:

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W1 Windows tested Daylight & Sunlight

SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS: Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

NOTES:

REV	Description	Drawn	Date

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TITLE:

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LONDON
WC2H 8AL

DRAWING:

KEY WINDOW LOCATIONS
166-170 Shaftesbury Avenue

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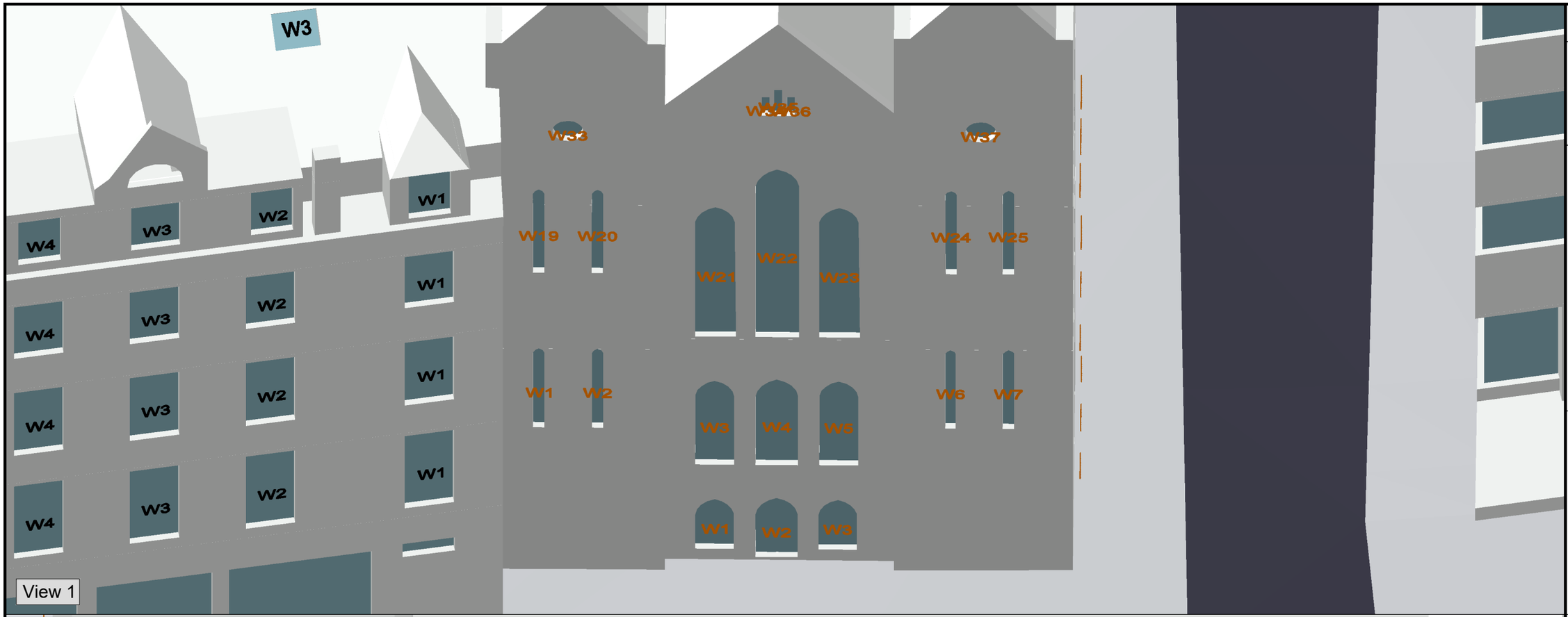

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SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS: Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

NOTES:

REV	Description	Drawn	Date

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TITLE:

151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:

KEY WINDOW LOCATIONS
166A Shaftesbury Avenue

DRAWN: MZB	JOB NBR: 23555
SCALE: NTS	
DATE: 02/01/2024	
DWG NO: LOC-006	REV: -

Appendix 3

Daylight and sunlight results for neighbouring buildings

Property, room & window attributes					VSC				NSL				APSH (room)						
Floor	Room	Room use	Window Ref./Orientation		Exis. (% VSC)	Prop. (% VSC)	Loss (% VSC)	Pro./Ex. ratio	Exis. (% rm)	Prop. (% rm)	Loss (m^2)	Pro./Ex. ratio	Annual (%APSH) Exis.	Prop.	Loss	Pro./Ex.	Winter (%APSH) Exis.	Prop.	Pro./Ex.
Note: Red = outside BRE guidelines; Blue = gain in light																			
Pendrell House, New Compton Street																			
F00	R1	Living Room	W1	↙	24.3	24.3	0.0	1.00											
		Living Room	W2	↙	22.1	22.2	-0.1	1.00											
		Living Room	W3	↓	18.7	18.6	0.1	0.99											
		Living Room	W4	↓	15.4	15.0	0.4	0.97											
		Living Room	W5	↘	12.5	11.3	1.2	0.90											
		Living Room	W6	↘	11.1	9.0	2.1	0.81											
		Living Room	W7	↘	10.3	7.8	2.5	0.76	71%	71%	0.02	1.00	49	49	N/A	N/A	5	5	N/A
	R2	Bedroom	W8	↘	10.1	7.4	2.7	0.73	23%	19%	0.43	0.82	18	14	4	N/A*	1	1	N/A*
	R3	Bedroom	W9	Inc	9.9	7.0	2.9	0.71	19%	15%	0.63	0.76	17	14	3	0.82	2	2	N/A*
	R6	Bedroom	W12	Inc	9.6	6.7	2.9	0.70	18%	13%	0.69	0.73	19	13	6	0.68	3	2	0.67
	R8	Bedroom	W16	↘	9.8	7.8	2.0	0.80											
		Bedroom	W17	↘	10.0	8.2	1.8	0.82	19%	19%	0.10	0.98	16	9	7	0.56	2	1	0.50
	R12	Living Room	W21	↘	9.4	8.3	1.1	0.88	21%	20%	0.19	0.95	19	16	3	0.84	3	2	N/A*
F01	R1	Living Room	W1	↘	13.1	10.7	2.4	0.82											
		Living Room	W2	↘	12.5	9.4	3.1	0.75											
		Living Room	W21	↙	26.1	26.2	-0.1	1.00											
		Living Room	W22	↙	23.9	23.9	0.0	1.00											
		Living Room	W23	↓	20.6	20.4	0.2	0.99											
		Living Room	W24	↓	17.4	16.8	0.6	0.97											
		Living Room	W25	↘	14.5	13.0	1.5	0.90	74%	74%	-0.01	1.00	54	54	N/A	N/A	10	10	N/A
	R2	Bedroom	W3	↘	12.0	8.8	3.2	0.73	26%	21%	0.54	0.80	22	18	4	0.82	4	4	N/A*
	R3	Bedroom	W4	Inc	11.8	8.3	3.5	0.70	22%	17%	0.81	0.76	20	16	4	0.80	3	3	N/A*
	R4	Bedroom	W5	Inc	6.2	2.7	3.5	0.44											
		Bedroom	W6	Inc	6.1	2.6	3.5	0.43	20%	8%	1.23	0.41	8	5	3	N/A*	2	2	N/A*
	R5	Bedroom	W7	Inc	11.4	7.9	3.5	0.69	21%	15%	0.92	0.69	20	16	4	0.80	4	3	N/A*
	R6	Bedroom	W8	↘	11.1	7.8	3.3	0.70	17%	13%	0.61	0.75	20	14	6	0.70	3	2	0.67
	R8	Bedroom	W10	↘	11.6	9.3	2.3	0.80											
		Bedroom	W12	↘	11.8	9.7	2.1	0.82	20%	19%	0.27	0.94	16	10	6	0.63	2	0	0.00
	R10	Bedroom	W13	↘	6.7	5.1	1.6	0.76											
		Bedroom	W14	↘	6.8	5.2	1.6	0.76	20%	19%	0.11	0.95	10	2	8	0.20	3	0	0.00
	R11	Living Room	W15	↘	12.3	10.8	1.5	0.88											
		Living Room	W16	↓	12.5	10.4	2.1	0.83											
		Living Room	W17	↘	12.4	10.6	1.8	0.85											
		Living Room	W18	↘	12.0	10.8	1.2	0.90											
		Living Room	W19	→	12.5	11.9	0.6	0.95											
		Living Room	W20	→	12.6	12.5	0.1	0.99	22%	18%	0.96	0.84	26	20	6	0.77	6	3	0.50
F02	R1	Living Room	W1	↘	15.7	12.8	2.9	0.82											
		Living Room	W2	↘	15.0	11.3	3.7	0.75											
		Living Room	W17	↙	27.9	27.9	N/A	N/A											
		Living Room	W18	↙	26.0	26.0	0.0	1.00											
		Living Room	W19	↓	23.0	22.7	0.3	0.99											
		Living Room	W20	↓	20.1	19.2	0.9	0.96											
		Living Room	W21	↘	17.2	15.3	1.9	0.89	79%	79%	0.03	1.00	59	58	N/A	N/A	12	12	N/A
	R2	Bedroom	W3	↘	14.5	10.6	3.9	0.73	32%	23%	0.85	0.74	28	23	5	0.82	7	7	N/A
	R3	Bedroom	W4	Inc	14.1	10.0	4.1	0.71	29%	20%	1.34	0.70	27	20	7	0.74	7	5	N/A
	R4	Kitchen	W5	↘	0.0	0.0	0.0	N/A	0%	0%	0.00	N/A	0	0	0	N/A	0	0	N/A
	R5	Bedroom	W6	↘	0.0	0.0	0.0	N/A	0%	0%	0.00	N/A	0	0	0	N/A	0	0	N/A
	R8	Kitchen	W10	↘	0.0	0.0	0.0	N/A	0%	0%	0.00	N/A	0	0	0	N/A	0	0	N/A
	R9	Living Room	W11	↘	14.6	12.9	1.7	0.88											
		Living Room	W12	↓	14.5	12.2	2.3	0.84											
		Living Room	W13	↘	14.6	12.7	1.9	0.87											
		Living Room	W14	↘	14.3	13.0	1.3	0.91											
		Living Room	W15	→	14.7	14.1	0.6	0.96											
		Living Room	W16	→	14.6	14.5	0.1	0.99	30%	27%	0.84	0.90	30	25	N/A	N/A	6	4	0.67
F03	R1	Living Room	W1	↘	18.8	15.2	3.6	0.81											
		Living Room	W2	↘	17.8	13.4	4.4	0.75											

Ratio: N/A or ≥0.8 = inside BRE (N/A* satisfies 4% APSH criterion); N/R = not required

Property, room & window attributes					VSC				NSL				APSH (room)						
Floor	Room	Room use	Window Ref./Orientation		Exis. (% VSC)	Prop. (% VSC)	Loss (% VSC)	Pro./Ex. ratio	Exis. (% rm)	Prop. (% rm)	Loss (m^2)	Pro./Ex. ratio	Annual (%APSH) Exis.	Prop.	Loss	Pro./Ex.	Winter (%APSH) Exis.	Prop.	Pro./Ex.
		Living Room	W17	↙	29.6	29.6	N/A	N/A											
		Living Room	W18	↙	28.1	28.1	N/A	N/A											
		Living Room	W19	↓	25.6	25.2	0.4	0.98											
		Living Room	W20	↓	23.0	21.8	1.2	0.95											
		Living Room	W21	↘	20.3	18.0	2.3	0.89	90%	90%	0.03	1.00	66	62	N/A	N/A	16	16	N/A
	R2	Bedroom	W3	↘	17.3	12.7	4.6	0.73	36%	26%	1.12	0.71	31	24	7	0.77	8	7	N/A
	R3	Bedroom	W4	Inc	16.8	11.9	4.9	0.71	34%	23%	1.69	0.67	31	22	9	0.71	8	6	N/A
	R4	Kitchen	W5	↘	0.0	0.0	0.0	N/A	0%	0%	0.00	N/A	0	0	0	N/A	0	0	N/A
	R8	Kitchen	W10	↘	0.0	0.0	0.0	N/A	0%	0%	0.00	N/A	0	0	0	N/A	0	0	N/A
	R9	Living Room	W11	↘	17.2	15.4	1.8	0.90											
		Living Room	W12	↓	16.8	14.4	2.4	0.86											
		Living Room	W13	↘	17.3	15.2	2.1	0.88											
		Living Room	W14	↘	16.9	15.5	1.4	0.92											
		Living Room	W15	→	17.3	16.6	0.7	0.96											
		Living Room	W16	→	17.0	16.8	0.2	0.99	37%	34%	0.81	0.92	35	30	N/A	N/A	7	4	0.57
F04	R1	Living Room	W1	↘	22.1	18.0	4.1	0.81											
		Living Room	W2	↘	21.1	16.0	5.1	0.76											
		Living Room	W17	↙	31.5	31.5	N/A	N/A											
		Living Room	W18	↙	30.3	30.3	N/A	N/A											
		Living Room	W19	↓	28.3	27.8	N/A	N/A											
		Living Room	W20	↓	26.1	24.7	1.4	0.95											
		Living Room	W21	↘	23.7	20.9	2.8	0.88	100%	100%	-0.06	1.00	74	66	N/A	N/A	19	18	N/A
	R2	Bedroom	W3	↘	20.5	15.2	5.3	0.74	43%	29%	1.44	0.68	39	31	N/A	N/A	12	11	N/A
	R3	Bedroom	W4	Inc	19.7	14.2	5.5	0.72	40%	26%	2.13	0.65	35	26	N/A	N/A	10	8	N/A
	R4	Kitchen	W5	↘	0.0	0.0	0.0	N/A	6%	0%	0.60	0.06	0	0	0	N/A	0	0	N/A
	R8	Kitchen	W10	↘	0.0	0.0	0.0	N/A	0%	0%	0.00	N/A	0	0	0	N/A	0	0	N/A
	R9	Living Room	W11	↘	20.4	18.3	2.1	0.90											
		Living Room	W12	↓	19.7	17.1	2.6	0.87											
		Living Room	W13	↘	20.5	18.2	2.3	0.89											
		Living Room	W14	↘	20.0	18.5	1.5	0.93											
		Living Room	W15	→	20.4	19.6	0.8	0.96											
		Living Room	W16	→	19.7	19.5	0.2	0.99	48%	45%	0.83	0.94	45	42	N/A	N/A	8	6	N/A
F05	R1	Bedroom	W1	↘	24.6	18.9	5.7	0.77	53%	33%	2.45	0.63	49	33	N/A	N/A	14	10	N/A
	R2	Bedroom	W2	↘	24.0	18.2	5.8	0.76	47%	28%	1.84	0.60	48	33	N/A	N/A	13	10	N/A
	R3	Bedroom	W3	↘	23.2	17.4	5.8	0.75											
		Bedroom	W4	↘	2.4	1.8	0.6	0.75	59%	33%	2.53	0.55	50	33	N/A	N/A	14	10	N/A
	R4	Unknown	W5	↘	0.3	0.2	0.1	0.67	20%	7%	0.93	0.37	0	0	0	N/A	0	0	N/A
	R7	Bedroom	W9	↘	1.2	1.1	0.1	0.92	41%	37%	0.38	0.90	3	3	0	1.00	0	0	N/A
	R9	Bedroom	W11	↘	24.5	22.4	2.1	0.91	66%	61%	0.54	0.93	47	42	N/A	N/A	9	6	N/A
45 New Compton Street																			
F01	R1	Unknown	W1	←	25.9	25.9	0.0	1.00											
		Unknown	W2	↓	16.9	16.8	0.1	0.99	69%	69%	0.00	1.00	47	47	0	N/A	2	2	N/A*
	R2	Unknown	W3	↓	16.0	15.7	0.3	0.98	36%	33%	0.33	0.92	40	40	0	N/A	2	2	N/A*
	R3	Unknown	W4	↓	15.2	14.7	0.5	0.97	53%	44%	2.05	0.82	35	34	1	N/A	2	1	N/A*
	R4	Unknown	W5	↓	15.7	14.9	0.8	0.95											
		Unknown	W6	→	5.8	5.7	0.1	0.98	52%	42%	2.15	0.80	37	36	1	N/A	2	1	N/A*
	R6	Unknown	W9	→	9.0	8.9	0.1	0.99	20%	19%	0.06	0.98	16	15	1	0.94	3	2	N/A*
	R7	Unknown	W10	→	9.0	8.9	0.1	0.99	21%	21%	0.00	1.00	17	16	1	0.94	4	3	N/A*
F02	R1	Unknown	W1	←	27.7	27.7	N/A	N/A											
		Unknown	W2	↓	20.1	19.8	0.3	0.99	73%	73%	0.00	1.00	56	54	2	N/A	6	4	N/A*
	R2	Unknown	W3	↓	19.4	19.0	0.4	0.98	49%	46%	0.38	0.94	50	50	0	N/A	3	3	N/A*
	R3	Unknown	W4	↓	18.4	17.8	0.6	0.97	65%	56%	1.95	0.86	45	43	2	N/A	5	3	N/A*
	R4	Unknown	W5	↓	18.9	18.0	0.9	0.95											
		Unknown	W6	→	6.9	6.8	0.1	0.99	64%	51%	2.63	0.80	46	45	1	N/A	3	2	N/A*
	R6	Unknown	W9	→	10.7	10.6	0.1	0.99	25%	25%	0.06	0.99	18	17	1	0.94	4	3	N/A*
	R7	Unknown	W10	→	10.7	10.7	0.0	1.00	25%	25%	0.00	1.00	19	19	0	1.00	4	4	N/A*
F03	R1	Unknown	W1	←	29.6	29.6	N/A	N/A											

Ratio: N/A or ≥0.8 = inside BRE (N/A* satisfies 4% APSH criterion); N/R = not required

Property, room & window attributes					VSC				NSL				APSH (room)						
Floor	Room	Room use	Window Ref./Orientation		Exis. (% VSC)	Prop. (% VSC)	Loss (% VSC)	Pro./Ex. ratio	Exis. (% rm)	Prop. (% rm)	Loss (m^2)	Pro./Ex. ratio	Annual (%APSH) Exis.	Prop.	Loss	Pro./Ex.	Winter (%APSH) Exis.	Prop.	Pro./Ex.
		Unknown	W2	↓	24.0	23.5	0.5	0.98	81%	81%	0.00	1.00	64	63	N/A	N/A	9	8	N/A
	R2	Unknown	W3	↓	23.6	22.9	0.7	0.97	72%	63%	1.02	0.88	57	56	N/A	N/A	8	7	N/A
	R3	Unknown	W4	↓	22.2	21.5	0.7	0.97	86%	77%	1.87	0.90	53	52	N/A	N/A	9	8	N/A
	R4	Unknown	W5	↓	22.6	21.6	1.0	0.96											
		Unknown	W6	→	8.3	8.2	0.1	0.99	74%	64%	2.13	0.86	52	51	N/A	N/A	7	6	N/A
	R6	Unknown	W9	→	12.8	12.7	0.1	0.99	30%	30%	0.04	0.99	20	20	0	1.00	4	4	N/A*
	R7	Unknown	W10	→	12.8	12.7	0.1	0.99	30%	30%	0.00	1.00	21	21	0	1.00	4	4	N/A*
F04	R1	Unknown	W1	←	31.3	31.3	N/A	N/A											
		Unknown	W2	↓	28.7	27.9	N/A	N/A	100%	100%	0.00	1.00	74	72	N/A	N/A	16	14	N/A
	R2	Unknown	W3	↓	28.2	27.3	N/A	N/A	87%	76%	1.30	0.87	68	66	N/A	N/A	15	13	N/A
	R3	Unknown	W4	↓	26.8	25.8	1.0	0.96	94%	91%	0.82	0.96	59	57	N/A	N/A	14	12	N/A
	R4	Unknown	W5	↓	26.7	25.5	1.2	0.96											
		Unknown	W6	→	10.0	9.8	0.2	0.98	85%	77%	1.71	0.90	63	62	N/A	N/A	12	11	N/A
	R6	Unknown	W9	→	15.3	15.2	0.1	0.99	37%	37%	0.01	1.00	24	24	0	1.00	5	5	N/A
	R7	Unknown	W10	→	15.3	15.2	0.1	0.99	37%	37%	0.00	1.00	26	25	N/A	N/A	6	5	N/A
167-177 Shaftesbury Avenue																			
F06	R2	Living Room	W2	Inc	28.3	28.3	N/A	N/A	96%	96%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
	R3	Kitchen	W3	↘	24.1	23.4	0.7	0.97	64%	63%	0.09	0.98	25	24	1	0.96	2	2	N/A*
	R4	Bedroom	W4	↘	31.5	31.0	N/A	N/A	92%	92%	0.04	1.00	45	41	N/A	N/A	9	9	N/A
	R5	Kitchen	W5	↘	32.6	32.4	N/A	N/A	93%	93%	0.00	1.00	55	52	N/A	N/A	15	14	N/A
	R6	Bedroom	W6	↘	32.6	32.5	N/A	N/A	98%	98%	0.03	1.00	55	52	N/A	N/A	16	14	N/A
	R7	Bedroom	W7	↘	32.4	32.3	N/A	N/A	98%	98%	0.00	1.00	57	56	N/A	N/A	17	16	N/A
	R8	Kitchen	W8	↘	32.4	32.4	N/A	N/A	94%	94%	0.00	1.00	57	57	N/A	N/A	17	17	N/A
	R9	Bedroom	W9	↘	31.3	31.3	N/A	N/A	96%	96%	0.00	1.00	57	57	N/A	N/A	17	17	N/A
	R10	Kitchen	W10	↘	23.9	23.9	0.0	1.00	66%	66%	0.00	1.00	54	54	N/A	N/A	17	17	N/A
	R11	Living Room	W11	Inc	27.3	27.3	N/A	N/A	94%	94%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
	R12	Living Room	W12	Inc	33.5	33.5	N/A	N/A	98%	98%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
	R13	Living Room	W13	Inc	34.3	34.3	N/A	N/A	98%	98%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
	R14	Living Room	W14	Inc	33.7	33.6	N/A	N/A	97%	97%	0.01	1.00	North	North	N/A	N/A	North	North	N/A
F07	R2	Living Room	W2	↖	27.9	27.9	N/A	N/A	96%	96%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
	R3	Kitchen	W3	↘	29.7	28.2	N/A	N/A	66%	63%	0.20	0.95	34	33	N/A	N/A	6	6	N/A
	R4	Bedroom	W4	↘	38.0	37.1	N/A	N/A	94%	92%	0.33	0.98	61	54	N/A	N/A	17	15	N/A
	R5	Kitchen	W5	↘	38.8	38.6	N/A	N/A	93%	93%	0.00	1.00	68	63	N/A	N/A	23	20	N/A
	R6	Bedroom	W6	↘	38.9	38.8	N/A	N/A	98%	98%	0.03	1.00	68	66	N/A	N/A	23	21	N/A
	R7	Bedroom	W7	↘	38.9	38.8	N/A	N/A	98%	98%	0.00	1.00	68	68	N/A	N/A	23	23	N/A
	R8	Kitchen	W8	↘	38.7	38.7	N/A	N/A	94%	94%	0.00	1.00	68	68	N/A	N/A	23	23	N/A
	R9	Bedroom	W9	↘	37.6	37.6	N/A	N/A	97%	97%	0.00	1.00	68	68	N/A	N/A	23	23	N/A
	R10	Kitchen	W10	↘	29.4	29.4	N/A	N/A	66%	66%	0.00	1.00	62	62	N/A	N/A	23	23	N/A
	R11	Living Room	W11	↖	26.1	26.0	0.1	1.00	92%	92%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
	R12	Living Room	W12	↖	33.6	33.5	N/A	N/A	98%	98%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
	R13	Living Room	W13	↖	34.8	34.8	N/A	N/A	99%	99%	0.02	1.00	North	North	N/A	N/A	North	North	N/A
	R14	Living Room	W14	↖	34.2	34.1	N/A	N/A	98%	98%	0.02	1.00	North	North	N/A	N/A	North	North	N/A
172-176 Shaftesbury Avenue (hotel)																			
F00	R2	Bedroom	W2	↖	12.0	11.5	0.5	0.96											
		Bedroom	W3	↖	12.1	11.5	0.6	0.95											
		Bedroom	W4	↖	12.0	11.3	0.7	0.94	29%	29%	0.01	1.00	North	North	N/A	N/A	North	North	N/A
	R3	Bedroom	W5	↖	10.8	10.0	0.8	0.93											
		Bedroom	W6	↖	12.1	11.3	0.8	0.93	34%	34%	0.11	0.99	North	North	N/A	N/A	North	North	N/A
	R4	Bedroom	W7	↖	12.0	11.2	0.8	0.93											
		Bedroom	W8	↖	10.6	9.8	0.8	0.92	35%	34%	0.10	0.99	North	North	N/A	N/A	North	North	N/A
	R5	Bedroom	W9	↖	11.5	10.8	0.7	0.94											
		Bedroom	W10	↖	11.4	10.6	0.8	0.93											
		Bedroom	W11	↖	11.3	10.4	0.9	0.92	32%	33%	-0.04	1.00	North	North	N/A	N/A	North	North	N/A
	R6	Bedroom	W12	↖	9.6	8.6	1.0	0.90											
		Bedroom	W13	↖	11.3	10.4	0.9	0.92	51%	51%	0.03	1.00	North	North	N/A	N/A	North	North	N/A
	R7	Bedroom	W14	↖	11.6	10.6	1.0	0.91											

Ratio: N/A or ≥0.8 = inside BRE (N/A* satisfies 4% APSH criterion); N/R = not required

Property, room & window attributes					VSC				NSL				APSH (room)						
Floor	Room	Room use	Window Ref./Orientation		Exis. (% VSC)	Prop. (% VSC)	Loss (% VSC)	Pro./Ex. ratio	Exis. (% rm)	Prop. (% rm)	Loss (m^2)	Pro./Ex. ratio	Annual (%APSH) Exis.	Prop.	Loss	Pro./Ex.	Winter (%APSH) Exis.	Prop.	Pro./Ex.
		Bedroom	W15	↖	10.9	10.0	0.9	0.92	40%	41%	-0.13	1.01	North	North	N/A	N/A	North	North	N/A
F01	R2	Bedroom	W2	↖	15.1	14.3	0.8	0.95											
		Bedroom	W3	↖	15.2	14.4	0.8	0.95											
		Bedroom	W4	↖	15.0	14.1	0.9	0.94	51%	51%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
	R3	Bedroom	W5	↖	13.5	12.4	1.1	0.92											
		Bedroom	W6	↖	14.8	13.7	1.1	0.93	41%	40%	0.28	0.98	North	North	N/A	N/A	North	North	N/A
	R4	Bedroom	W7	↖	14.7	13.6	1.1	0.93											
		Bedroom	W8	↖	13.2	12.1	1.1	0.92	42%	41%	0.12	0.99	North	North	N/A	N/A	North	North	N/A
	R5	Bedroom	W9	↖	14.1	12.9	1.2	0.91	38%	35%	0.64	0.91	North	North	N/A	N/A	North	North	N/A
	R6	Bedroom	W10	↖	13.9	12.6	1.3	0.91	42%	39%	0.43	0.94	North	North	N/A	N/A	North	North	N/A
	R7	Bedroom	W11	↖	11.9	10.4	1.5	0.87											
		Bedroom	W12	↖	13.8	12.3	1.5	0.89	58%	58%	-0.03	1.00	North	North	N/A	N/A	North	North	N/A
	R8	Bedroom	W13	↖	14.1	12.6	1.5	0.89											
		Bedroom	W14	↖	13.4	11.9	1.5	0.89	46%	46%	-0.01	1.00	North	North	N/A	N/A	North	North	N/A
F02	R2	Bedroom	W2	↖	18.1	17.2	0.9	0.95											
		Bedroom	W3	↖	17.6	16.5	1.1	0.94											
		Bedroom	W4	↖	12.1	10.9	1.2	0.90	57%	57%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
	R3	Bedroom	W5	↖	15.4	14.1	1.3	0.92											
		Bedroom	W6	↖	17.7	16.2	1.5	0.92	49%	48%	0.41	0.97	North	North	N/A	N/A	North	North	N/A
	R4	Bedroom	W7	↖	18.0	16.4	1.6	0.91											
		Bedroom	W8	↖	16.4	14.7	1.7	0.90	50%	49%	0.18	0.99	North	North	N/A	N/A	North	North	N/A
	R5	Bedroom	W9	↖	17.2	15.4	1.8	0.90	45%	39%	1.01	0.87	North	North	N/A	N/A	North	North	N/A
	R6	Bedroom	W10	↖	17.0	15.0	2.0	0.88	49%	45%	0.62	0.93	North	North	N/A	N/A	North	North	N/A
	R7	Bedroom	W11	↖	14.8	12.6	2.2	0.85											
		Bedroom	W12	↖	17.0	14.7	2.3	0.86	65%	64%	0.18	0.99	North	North	N/A	N/A	North	North	N/A
	R8	Bedroom	W13	↖	17.2	14.9	2.3	0.87											
		Bedroom	W14	↖	16.4	14.2	2.2	0.87	52%	51%	0.20	0.99	North	North	N/A	N/A	North	North	N/A
F03	R2	Bedroom	W2	↖	21.7	20.6	1.1	0.95											
		Bedroom	W3	↖	21.1	19.9	1.2	0.94	68%	68%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
	R3	Bedroom	W4	↖	22.3	20.8	1.5	0.93											
		Bedroom	W5	←	24.0	22.0	2.0	0.92											
		Bedroom	W6	↙	17.0	15.8	1.2	0.93	66%	62%	0.70	0.95	33	31	N/A	N/A	7	7	N/A
	R4	Bedroom	W7	↖	19.3	17.6	1.7	0.91											
		Bedroom	W8	↖	22.0	20.2	1.8	0.92	56%	55%	0.16	0.99	North	North	N/A	N/A	North	North	N/A
	R5	Bedroom	W9	↖	22.3	20.3	2.0	0.91											
		Bedroom	W10	↖	21.4	19.3	2.1	0.90	52%	51%	0.35	0.98	North	North	N/A	N/A	North	North	N/A
	R6	Bedroom	W11	↖	20.9	18.5	2.4	0.89											
		Bedroom	W12	↖	20.7	18.2	2.5	0.88	52%	49%	0.51	0.94	North	North	N/A	N/A	North	North	N/A
	R7	Bedroom	W13	↖	20.6	18.0	2.6	0.87											
		Bedroom	W14	↖	20.4	17.7	2.7	0.87	52%	50%	0.41	0.96	North	North	N/A	N/A	North	North	N/A
	R8	Bedroom	W15	↖	19.8	16.8	3.0	0.85											
		Bedroom	W16	↖	21.1	18.0	3.1	0.85	61%	48%	2.69	0.79	North	North	N/A	N/A	North	North	N/A
	R9	Bedroom	W17	↖	21.1	18.0	3.1	0.85											
		Bedroom	W18	↖	20.9	17.8	3.1	0.85	43%	32%	3.03	0.74	North	North	N/A	N/A	North	North	N/A
F04	R2	Bedroom	W2	↖	26.2	25.0	1.2	0.95											
		Bedroom	W3	↖	26.2	24.8	1.4	0.95	47%	47%	0.09	0.99	North	North	N/A	N/A	North	North	N/A
	R3	Bedroom	W4	↖	25.9	24.2	1.7	0.93											
		Bedroom	W5	←	28.4	26.1	2.3	0.92											
		Bedroom	W7	↙	28.3	26.9	1.4	0.95	47%	43%	0.75	0.91	58	55	N/A	N/A	16	16	N/A
	R4	Bedroom	W6	↖	22.3	20.5	1.8	0.92											
		Bedroom	W8	↖	25.9	23.8	2.1	0.92	56%	55%	0.27	0.98	North	North	N/A	N/A	North	North	N/A
	R5	Bedroom	W9	↖	26.1	23.9	2.2	0.92											
		Bedroom	W10	↖	25.9	23.5	2.4	0.91	54%	53%	0.41	0.97	North	North	N/A	N/A	North	North	N/A
	R6	Bedroom	W11	↖	25.1	22.1	3.0	0.88	63%	57%	1.24	0.90	North	North	N/A	N/A	North	North	N/A
	R7	Bedroom	W12	↖	24.9	21.4	3.5	0.86											
		Bedroom	W13	↖	24.8	21.3	3.5	0.86	68%	60%	1.47	0.88	North	North	N/A	N/A	North	North	N/A
	R8	Bedroom	W14	↖	24.7	21.1	3.6	0.85											
		Bedroom	W15	↖	24.7	21.1	3.6	0.85	50%	45%	1.29	0.89	North	North	N/A	N/A	North	North	N/A

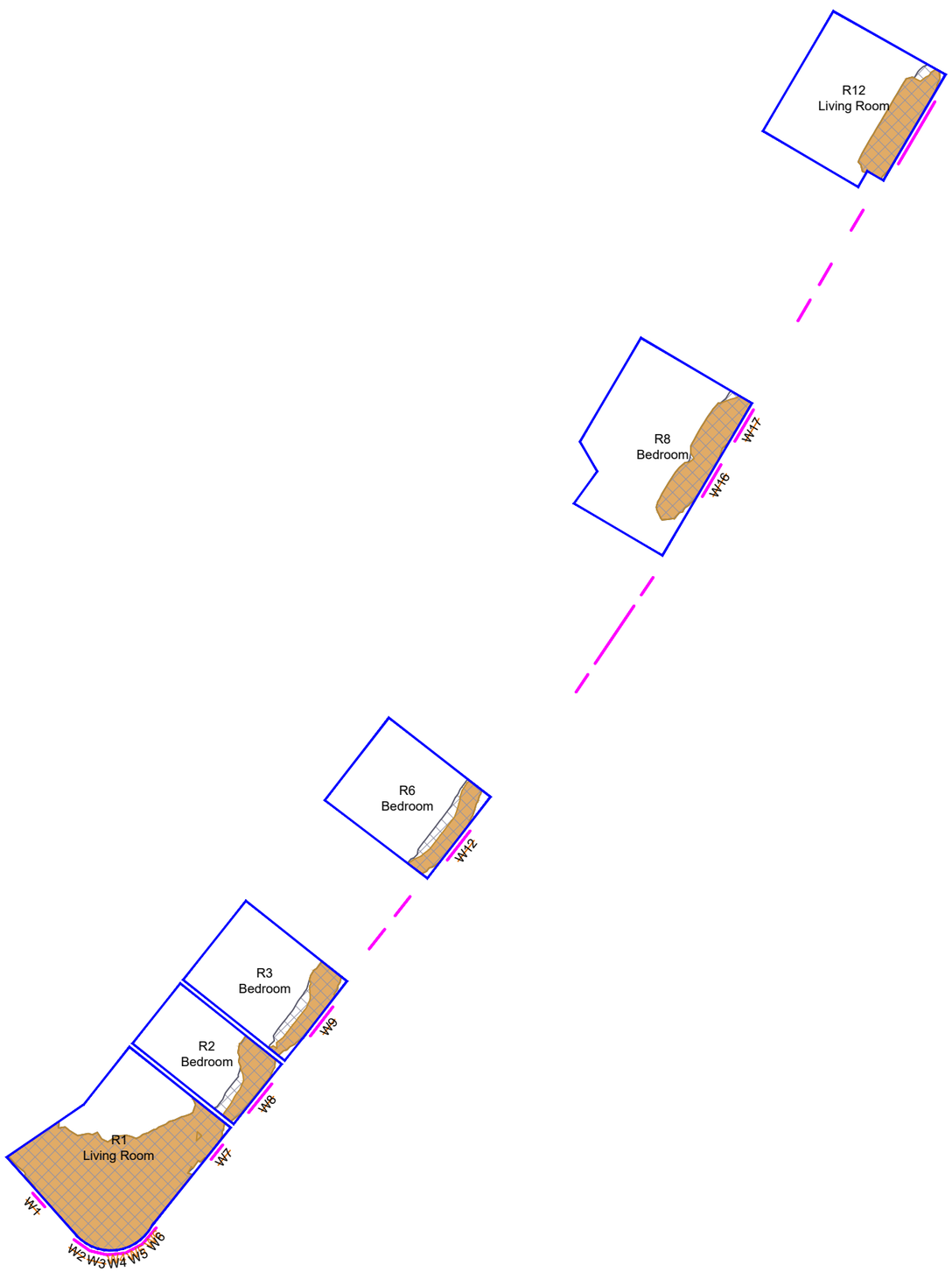
Ratio: N/A or ≥0.8 = inside BRE (N/A* satisfies 4% APSH criterion); N/R = not required

Property, room & window attributes					VSC				NSL				APSH (room)						
Floor	Room	Room use	Window Ref./Orientation		Exis. (% VSC)	Prop. (% VSC)	Loss (% VSC)	Pro./Ex. ratio	Exis. (% rm)	Prop. (% rm)	Loss (m^2)	Pro./Ex. ratio	Annual (%APSH) Exis.	Prop.	Loss	Pro./Ex.	Winter (%APSH) Exis.	Prop.	Pro./Ex.
166-170 Shaftesbury Avenue																			
F01	R1	LD	W1	↖	14.0	13.4	0.6	0.96											
		LD	W2	↖	13.5	12.7	0.8	0.94	48%	49%	-0.10	1.01	North	North	N/A	N/A	North	North	N/A
	R2	LKD	W3	↖	13.2	12.3	0.9	0.93											
		LKD	W4	↖	13.1	12.0	1.1	0.92											
		LKD	W5	↖	12.9	11.8	1.1	0.91	52%	54%	-0.49	1.03	North	North	N/A	N/A	North	North	N/A
F02	R1	LD	W1	↖	16.3	15.2	1.1	0.93											
		LD	W2	↖	15.7	14.4	1.3	0.92	58%	57%	0.27	0.98	North	North	N/A	N/A	North	North	N/A
	R2	LKD	W3	↖	15.4	14.0	1.4	0.91											
		LKD	W4	↖	15.2	13.6	1.6	0.89											
		LKD	W5	↖	15.0	13.4	1.6	0.89	61%	62%	-0.14	1.01	North	North	N/A	N/A	North	North	N/A
F03	R1	LD	W1	↖	18.2	16.6	1.6	0.91											
		LD	W2	↖	17.5	15.7	1.8	0.90	59%	57%	0.56	0.96	North	North	N/A	N/A	North	North	N/A
	R2	LKD	W3	↖	17.2	15.1	2.1	0.88											
		LKD	W4	↖	17.0	14.8	2.2	0.87											
		LKD	W5	↖	17.0	14.6	2.4	0.86	61%	61%	0.09	1.00	North	North	N/A	N/A	North	North	N/A
F04	R1	Unknown	W1	↖	21.6	19.5	2.1	0.90	23%	20%	0.46	0.87	North	North	N/A	N/A	North	North	N/A
	R2	Unknown	W2	↖	21.1	18.6	2.5	0.88	26%	21%	0.71	0.81	North	North	N/A	N/A	North	North	N/A
	R3	Unknown	W3	↖	20.8	18.0	2.8	0.87											
		Unknown	W4	↖	20.5	17.6	2.9	0.86	60%	59%	0.17	0.98	North	North	N/A	N/A	North	North	N/A
	R4	Unknown	W5	↖	20.4	17.4	3.0	0.85	14%	10%	0.71	0.67	North	North	N/A	N/A	North	North	N/A
F05	R1	Unknown	W1	Inc	71.4	67.9	N/A	N/A											
		Unknown	W4	Inc	69.1	65.5	N/A	N/A	76%	76%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
	R2	Unknown	W2	Inc	73.2	70.2	N/A	N/A											
		Unknown	W3	Inc	71.4	68.3	N/A	N/A	78%	78%	0.00	1.00	North	North	N/A	N/A	North	North	N/A
166A Shaftesbury Avenue (church)																			
F00	R1	Unknown	W1	↖	11.8	11.6	0.2	0.98											
		Unknown	W2	↖	12.4	12.2	0.2	0.98											
		Unknown	W3	↖	12.7	12.7	0.0	1.00	36%	39%	-0.85	1.11	North	North	N/A	N/A	North	North	N/A
	R2	Unknown	W4	↙	14.5	14.5	0.0	1.00											
		Unknown	W5	↙	12.8	12.8	0.0	1.00											
		Unknown	W6	↙	11.2	11.2	0.0	1.00	65%	65%	0.00	1.00	27	27	N/A	N/A	6	6	N/A
	R3	Unknown	W7	↙	10.0	10.0	0.0	1.00											
		Unknown	W8	↙	9.0	9.0	0.0	1.00											
		Unknown	W9	↙	8.8	8.8	0.0	1.00											
		Unknown	W10	↙	8.5	8.5	0.0	1.00											
		Unknown	W11	↙	8.5	8.5	0.0	1.00											
		Unknown	W12	↙	8.5	8.5	0.0	1.00											
		Unknown	W13	↙	8.2	8.2	0.0	1.00											
		Unknown	W1	Inc	9.7	9.3	0.4	0.96											
		Unknown	W2	Inc	12.4	11.7	0.7	0.94											
		Unknown	W3	↖	14.0	13.5	0.5	0.96											
		Unknown	W4	↖	14.7	14.3	0.4	0.97											
		Unknown	W5	↖	15.0	14.7	0.3	0.98											
		Unknown	W6	↖	17.0	16.8	0.2	0.99											
		Unknown	W7	↖	17.4	17.3	0.1	0.99											
		Unknown	W8	↙	17.0	17.0	0.0	1.00											
		Unknown	W9	↙	15.2	15.2	0.0	1.00											
		Unknown	W10	↙	13.8	13.8	0.0	1.00											
		Unknown	W11	↙	13.3	13.3	0.0	1.00											
		Unknown	W12	↙	12.9	12.9	0.0	1.00											
		Unknown	W13	↙	12.3	12.3	0.0	1.00											
		Unknown	W14	↙	12.2	12.2	0.0	1.00											
		Unknown	W15	↙	12.0	12.0	0.0	1.00											
		Unknown	W16	↙	12.0	12.0	0.0	1.00											
		Unknown	W17	↙	12.1	12.1	0.0	1.00											

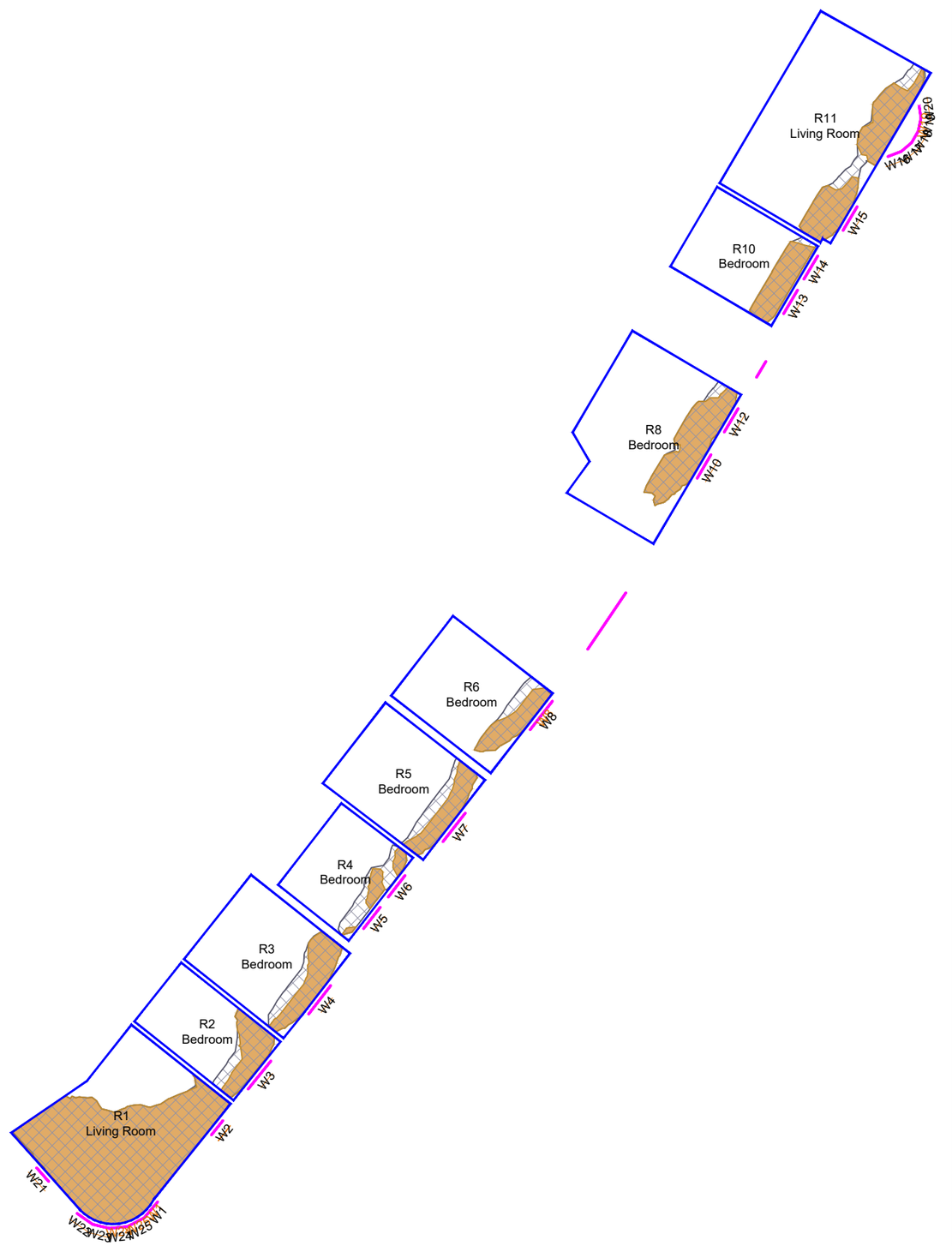
Ratio: N/A or ≥0.8 = inside BRE (N/A* satisfies 4% APSH criterion); N/R = not required

Property, room & window attributes					VSC				NSL				APSH (room)							
Floor	Room	Room use	Window Ref./Orientation		Exis. (% VSC)	Prop. (% VSC)	Loss (% VSC)	Pro./Ex. ratio	Exis. (% rm)	Prop. (% rm)	Loss (m^2)	Pro./Ex. ratio	Annual (%APSH) Exis.	Prop.	Loss	Pro./Ex.	Winter (%APSH) Exis.	Prop.	Pro./Ex.	
		Unknown	W18	↙	11.9	11.9	0.0	1.00												
		Unknown	W19	Inc	13.0	12.2	0.8	0.94												
		Unknown	W20	Inc	16.8	15.4	1.4	0.92												
		Unknown	W21	↖	17.9	16.9	1.0	0.94												
		Unknown	W22	↖	19.3	18.4	0.9	0.95												
		Unknown	W23	↖	19.0	18.3	0.7	0.96												
		Unknown	W24	↖	21.6	20.9	0.7	0.97												
		Unknown	W25	↖	22.0	21.5	0.5	0.98												
		Unknown	W26	↙	21.5	21.5	0.0	1.00												
		Unknown	W27	↙	19.7	19.7	0.0	1.00												
		Unknown	W28	↙	18.2	18.2	0.0	1.00												
		Unknown	W29	↙	15.2	15.2	0.0	1.00												
		Unknown	W30	↙	14.4	14.4	0.0	1.00												
		Unknown	W31	↙	14.2	14.2	0.0	1.00												
		Unknown	W32	↙	14.4	14.4	0.0	1.00												
		Unknown	W33	Inc	21.5	19.6	1.9	0.91												
		Unknown	W34	↖	24.3	22.7	1.6	0.93												
		Unknown	W35	↖	24.5	23.0	1.5	0.94												
		Unknown	W36	↖	24.5	22.9	1.6	0.93												
		Unknown	W37	↖	25.1	24.1	1.0	0.96	99%	99%	0.77	1.00	50	50	N/A	N/A	10	10	N/A	
F01	R1	Unknown	W7	↙	10.0	10.0	0.0	1.00												
		Unknown	W8	↙	9.0	9.0	0.0	1.00												
		Unknown	W9	↙	8.8	8.8	0.0	1.00												
		Unknown	W10	↙	8.5	8.5	0.0	1.00												
		Unknown	W11	↙	8.5	8.5	0.0	1.00												
		Unknown	W12	↙	8.5	8.5	0.0	1.00												
		Unknown	W13	↙	8.2	8.2	0.0	1.00												
		Unknown	W1	Inc	9.7	9.3	0.4	0.96												
		Unknown	W2	Inc	12.4	11.7	0.7	0.94												
		Unknown	W3	↖	14.0	13.5	0.5	0.96												
		Unknown	W4	↖	14.7	14.3	0.4	0.97												
		Unknown	W5	↖	15.0	14.7	0.3	0.98												
		Unknown	W6	↖	17.0	16.8	0.2	0.99												
		Unknown	W7	↖	17.4	17.3	0.1	0.99												
		Unknown	W8	↙	17.0	17.0	0.0	1.00												
		Unknown	W9	↙	15.2	15.2	0.0	1.00												
		Unknown	W10	↙	13.8	13.8	0.0	1.00												
		Unknown	W11	↙	13.3	13.3	0.0	1.00												
		Unknown	W12	↙	12.9	12.9	0.0	1.00												
		Unknown	W13	↙	12.3	12.3	0.0	1.00												
		Unknown	W14	↙	12.2	12.2	0.0	1.00												
		Unknown	W15	↙	12.0	12.0	0.0	1.00												
		Unknown	W16	↙	12.0	12.0	0.0	1.00												
		Unknown	W17	↙	12.1	12.1	0.0	1.00												
		Unknown	W18	↙	11.9	11.9	0.0	1.00												
		Unknown	W19	Inc	13.0	12.2	0.8	0.94												
		Unknown	W20	Inc	16.8	15.4	1.4	0.92												
		Unknown	W21	↖	17.9	16.9	1.0	0.94												
		Unknown	W22	↖	19.3	18.4	0.9	0.95												
		Unknown	W23	↖	19.0	18.3	0.7	0.96												
		Unknown	W24	↖	21.6	20.9	0.7	0.97												
		Unknown	W25	↖	22.0	21.5	0.5	0.98												
		Unknown	W26	↙	21.5	21.5	0.0	1.00												
		Unknown	W27	↙	19.7	19.7	0.0	1.00												
		Unknown	W28	↙	18.2	18.2	0.0	1.00												
		Unknown	W29	↙	15.2	15.2	0.0	1.00												
		Unknown	W30	↙	14.4	14.4	0.0	1.00												
		Unknown	W31	↙	14.2	14.2	0.0	1.00												

Property, room & window attributes			VSC				NSL				APSH (room)						
Floor	Room	Room use	Window Ref./Orientation	Exis. (% VSC)	Prop. (% VSC)	Loss (% VSC)	Pro./Ex. ratio	Exis. (% rm)	Prop. (% rm)	Loss (m^2)	Pro./Ex. ratio	Annual (%APSH) Exis.	Prop.	Loss	Pro./Ex.	Winter (%APSH) Exis.	Prop.	Pro./Ex.
		Unknown	W32 ↙	14.4	14.4	0.0	1.00											
		Unknown	W33 Inc	21.5	19.6	1.9	0.91											
		Unknown	W34 ↖	24.3	22.7	1.6	0.93											
		Unknown	W35 ↖	24.5	23.0	1.5	0.94											
		Unknown	W36 ↖	24.5	22.9	1.6	0.93											
		Unknown	W37 ↖	25.1	24.1	1.0	0.96	98%	98%	0.00	1.00	50	50	N/A	N/A	10	10	N/A



F00



F01

NO DIMENSIONS TO BE SCALED FROM THIS DRAWING

KEY:

Existing Lit Area

Proposed Lit Area

Area of Light Loss

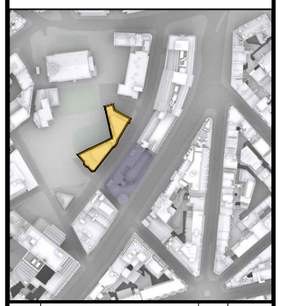
Area of Light Gain

SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS:
Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

NOTES:



REV	Description	Drawn	Date

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Chartered Surveyors

London 020 7936 3668
Liverpool 0151 242 0980
Bristol 0117 450 9703

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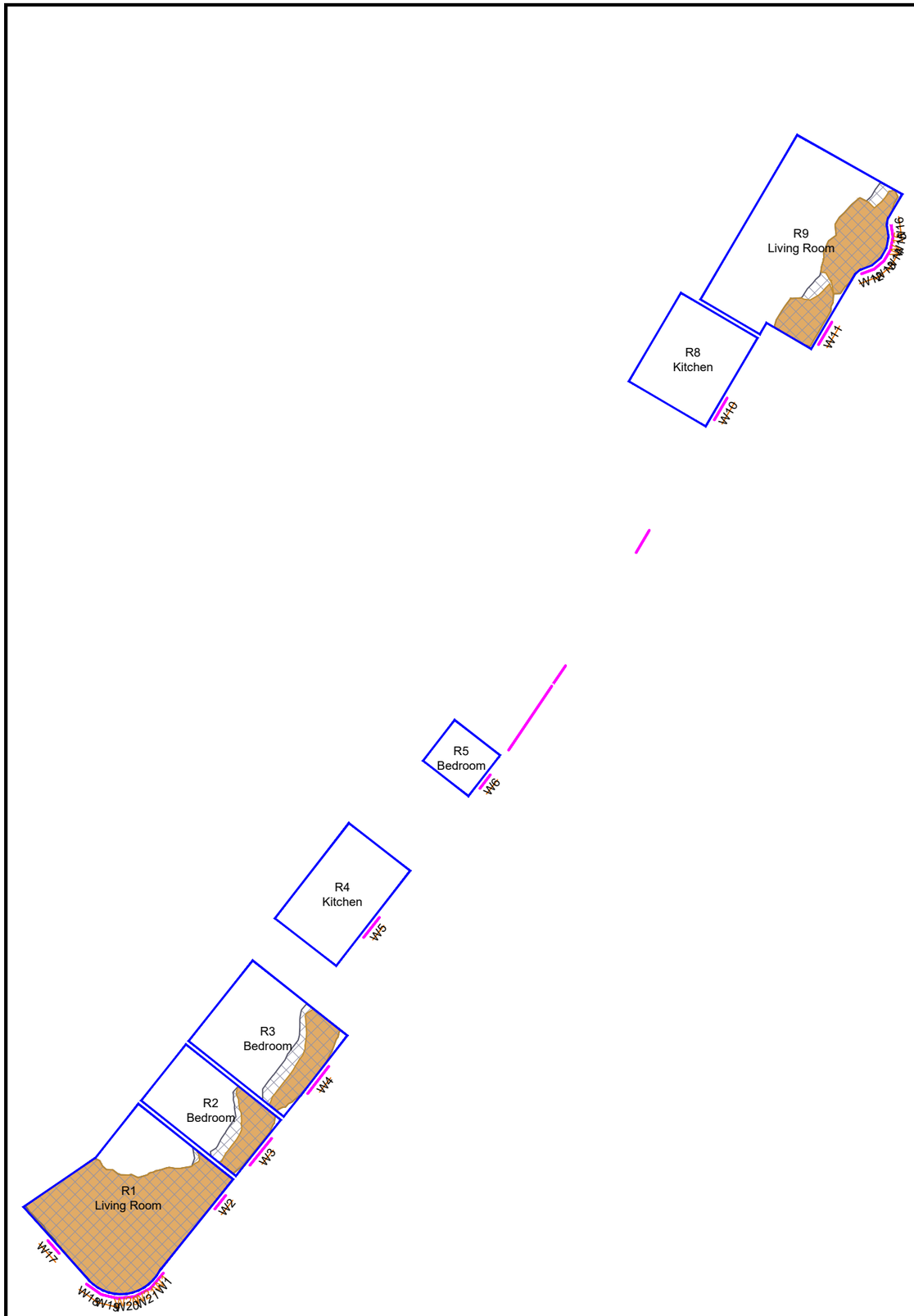
TITLE:

151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:

RIGHTS OF LIGHT CONTOURS
Pendrell House

DRAWN: MZB	JOB NBR: 23555-02
SCALE: 1:175@A3	
DATE: 16/02/2024	
DWG NO: NSL-001 (1)	REV: -



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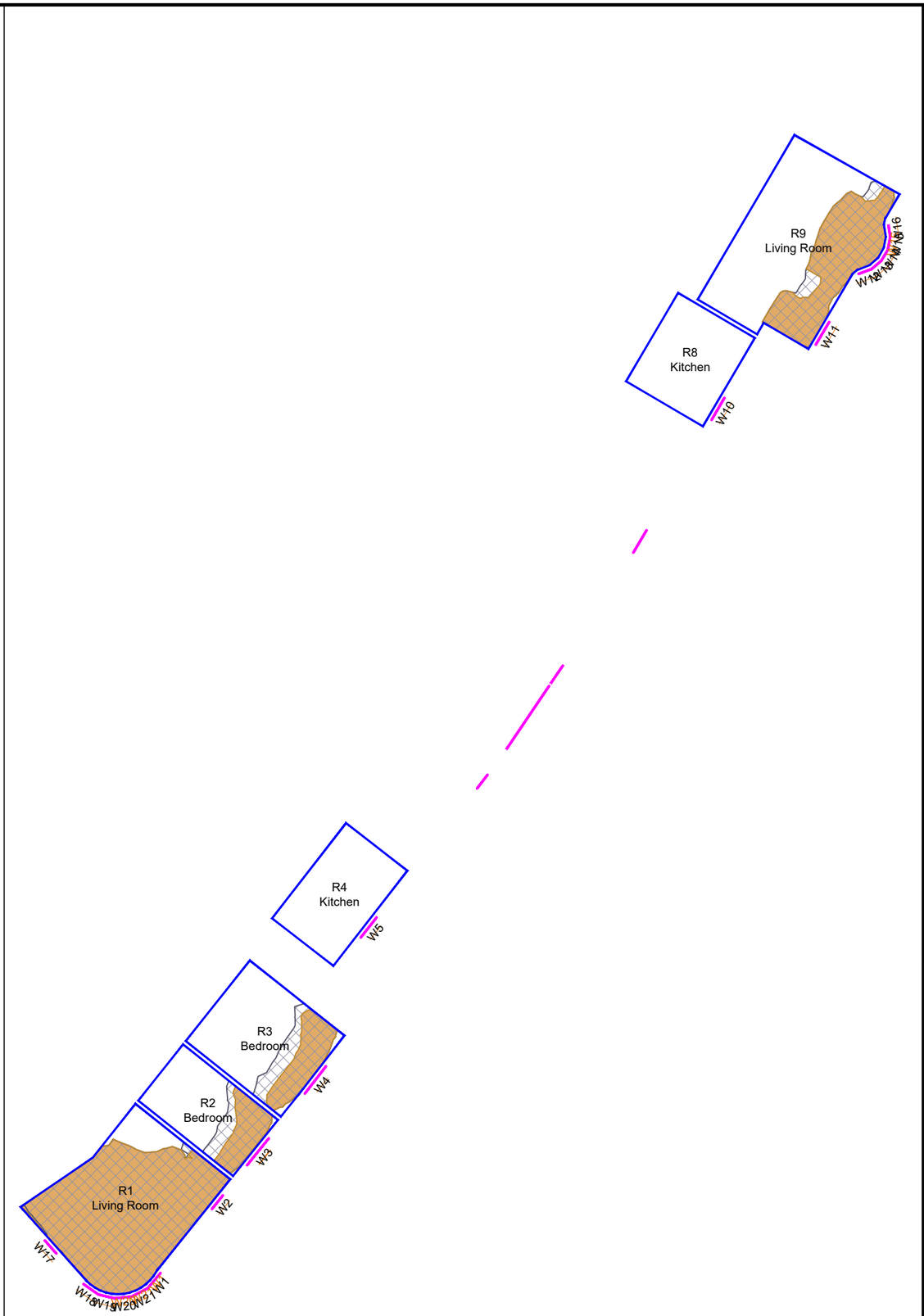


F03

NO DIMENSIONS TO BE SCALED
FROM THIS DRAWING

KEY:

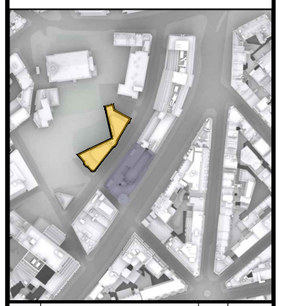
- Existing Lit Area
- Proposed Lit Area
- Area of Light Loss
- Area of Light Gain

SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS:
Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

NOTES:



REV	Description	Drawn	Date

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Bristol 0117 450 9703

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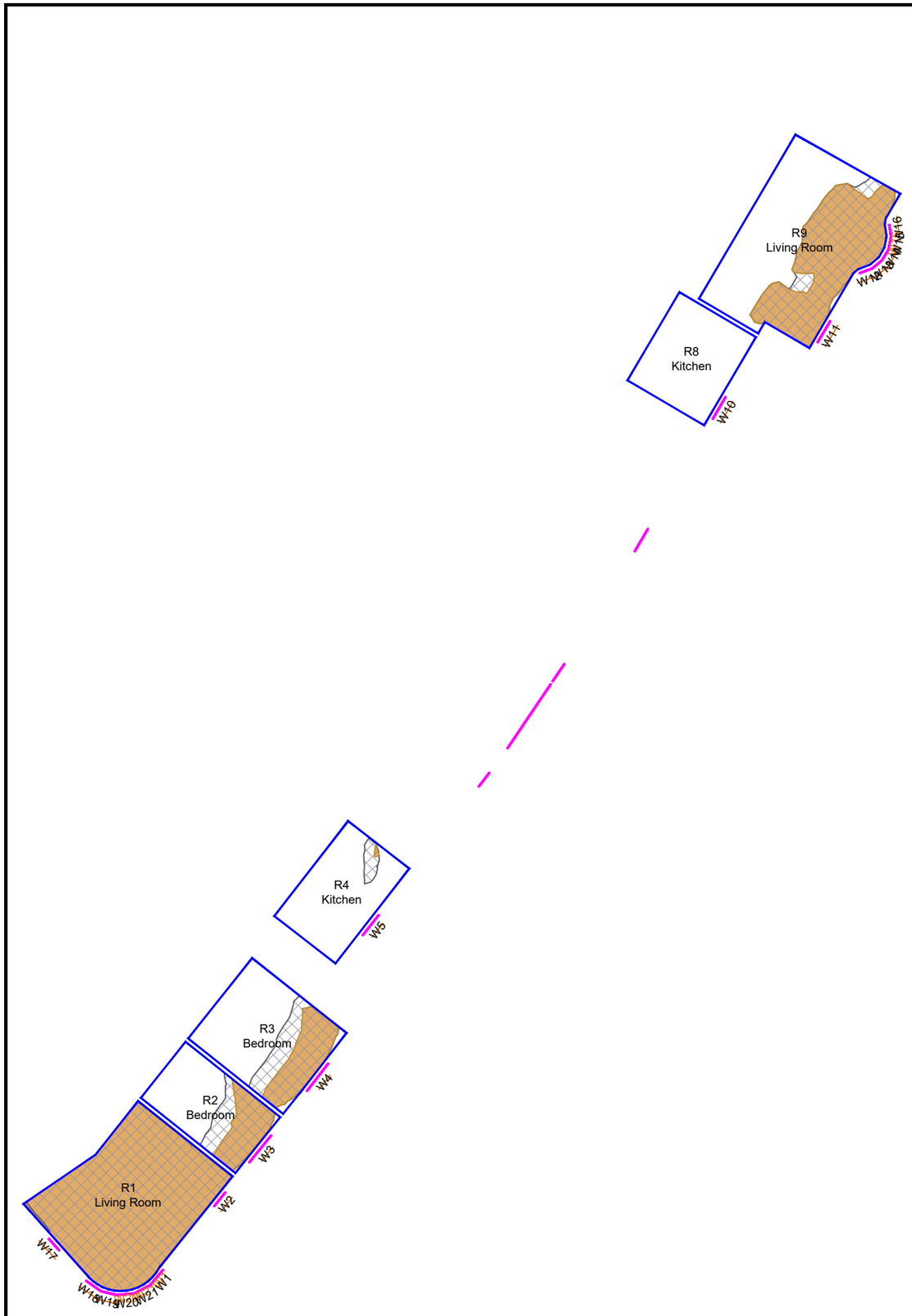
TITLE:
151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:
RIGHTS OF LIGHT CONTOURS
Pendrell House

DRAWN: MZB	JOB NBR: 23555-02
SCALE: 1:175@A3	
DATE: 16/02/2024	
DWG NO: NSL-001 (2)	REV: -



F04

F05

NO DIMENSIONS TO BE SCALED FROM THIS DRAWING

KEY:

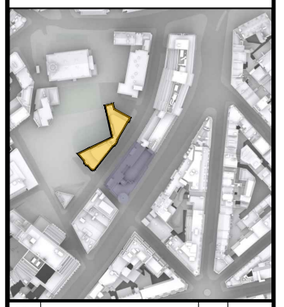
- Existing Lit Area
- Proposed Lit Area
- Area of Light Loss
- Area of Light Gain

SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS:
Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

NOTES:



REV	Description	Drawn	Date

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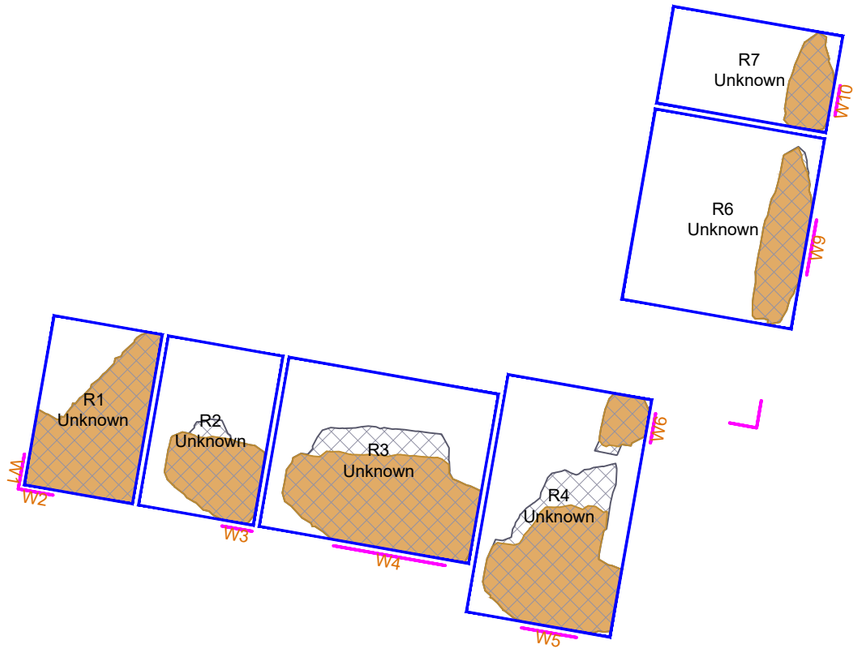
TITLE:
151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:
RIGHTS OF LIGHT CONTOURS
Pendrell House

DRAWN: MZB	JOB NBR: 23555-02
SCALE: 1:175@A3	
DATE: 16/02/2024	
DWG NO: NSL-001 (3)	REV: -



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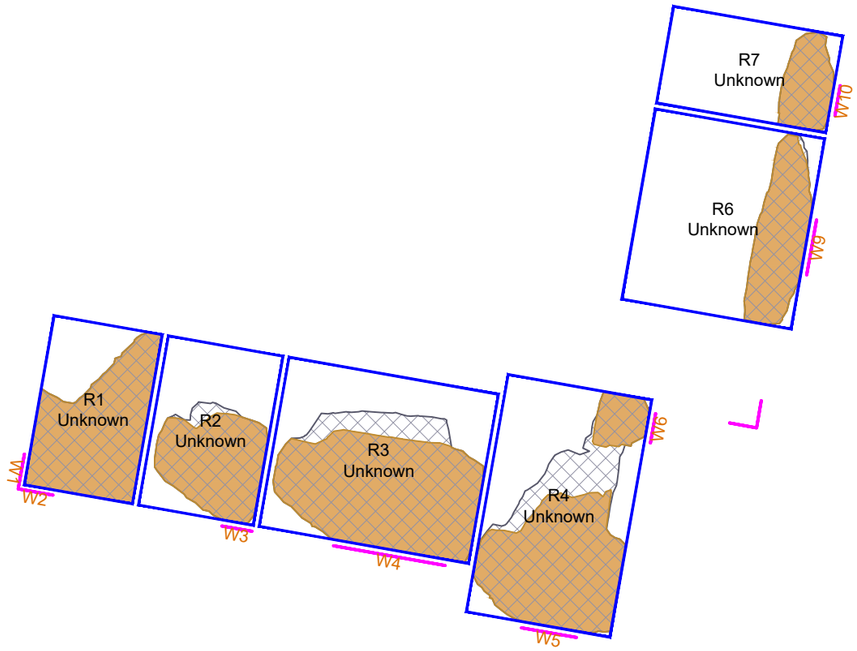

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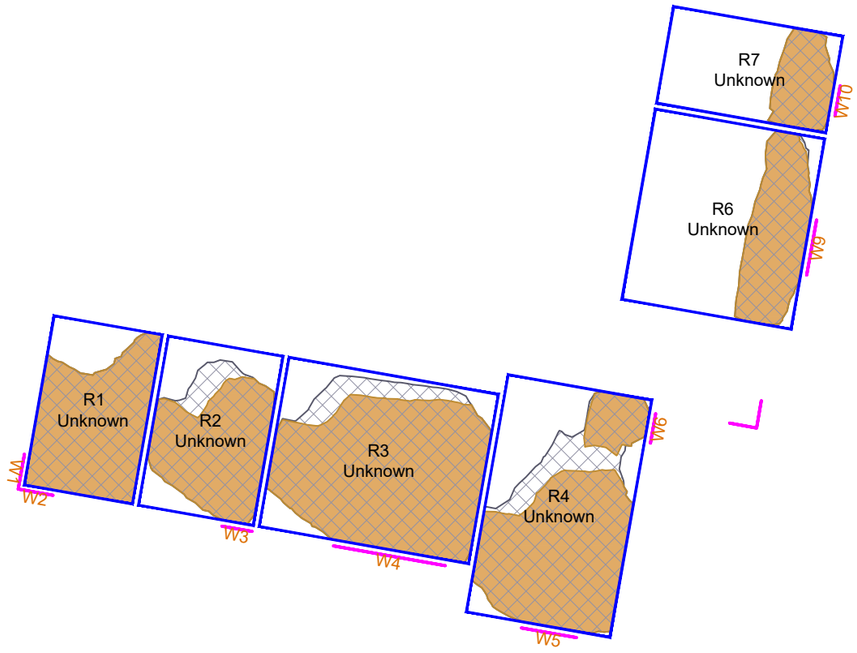


F03

F04

NO DIMENSIONS TO BE SCALED FROM THIS DRAWING

KEY:

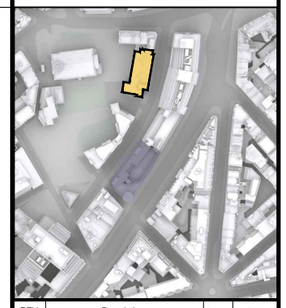
- Existing Lit Area
- Proposed Lit Area
- Area of Light Loss
- Area of Light Gain

SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS:
Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

NOTES:



REV	Description	Drawn	Date

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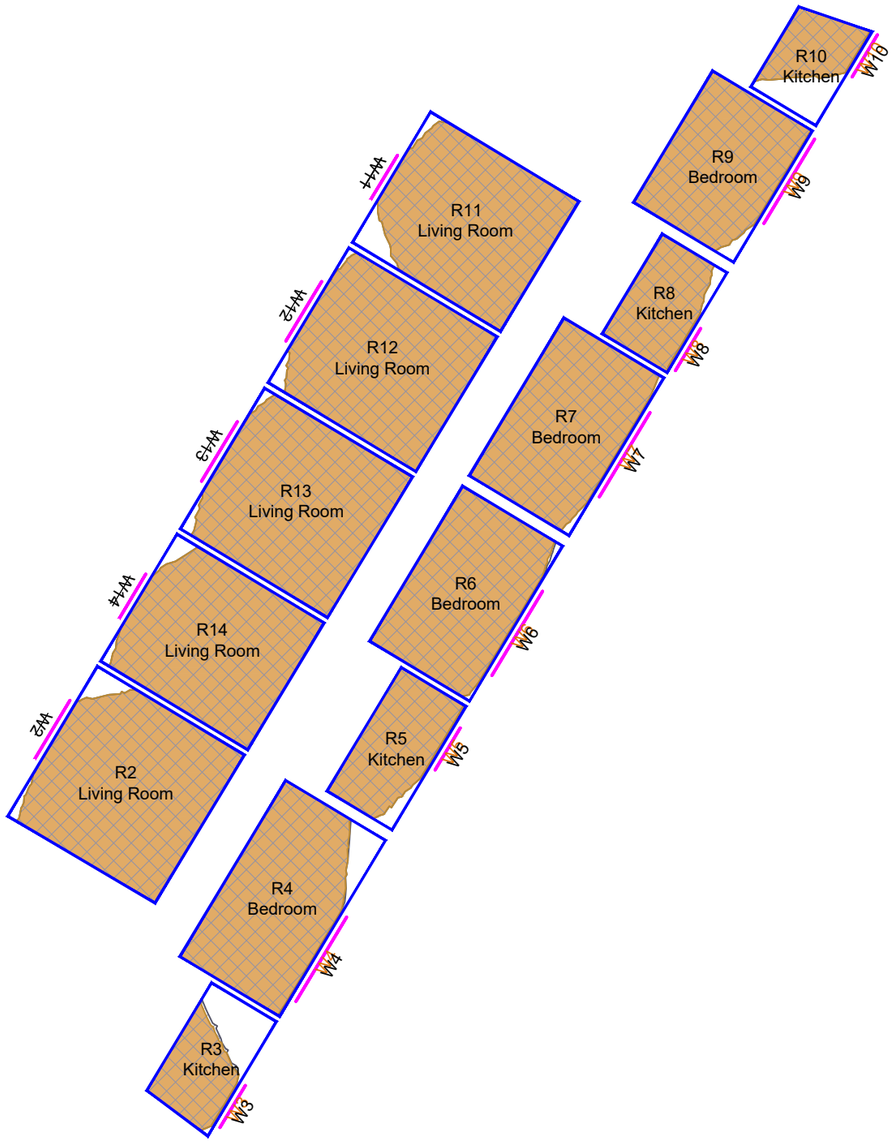
Liverpool 0151 242 0980
Bristol 0117 450 9703

www.delvapatmanredler.co.uk
info@dpr.uk.com

TITLE:
151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:
RIGHTS OF LIGHT CONTOURS
45 New Compton Street

DRAWN: MZB	JOB NBR: 23555-02
SCALE: 1:150@A3	
DATE: 16/02/2024	
DWG NO: NSL-002	REV: -



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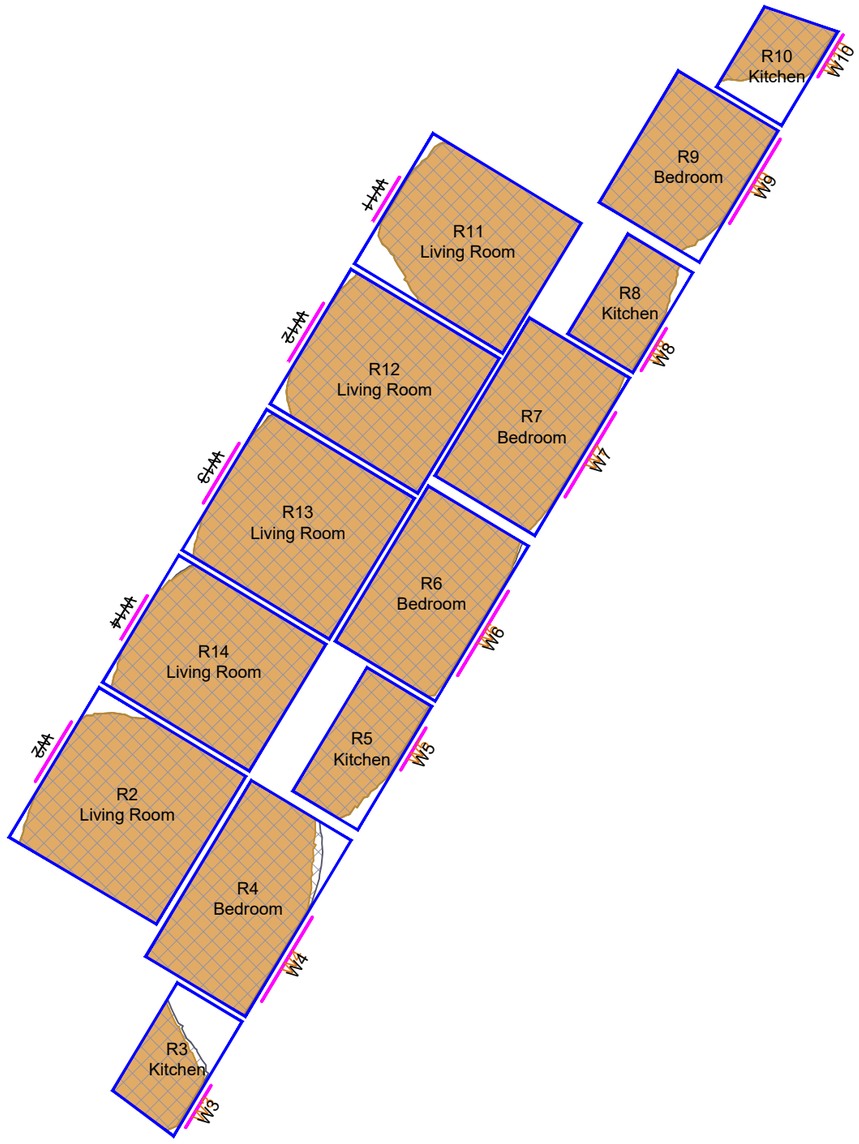


F07

NO DIMENSIONS TO BE SCALED FROM THIS DRAWING

KEY:

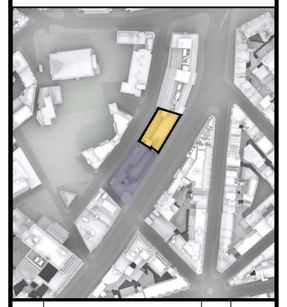
- Existing Lit Area
- Proposed Lit Area
- Area of Light Loss
- Area of Light Gain

SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS:
Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

NOTES:



REV	Description	Drawn	Date

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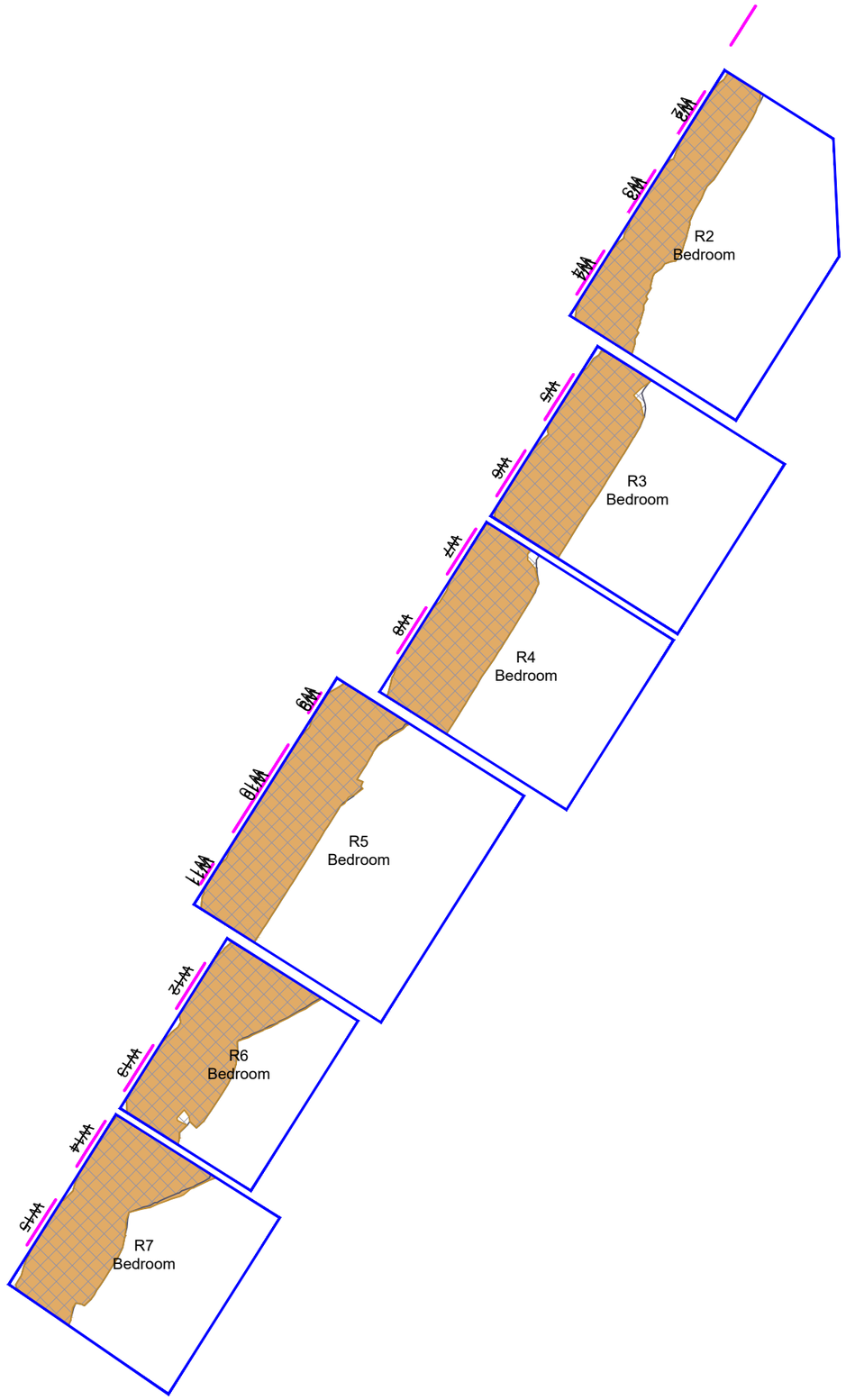
TITLE:
151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:
RIGHTS OF LIGHT CONTOURS
167-177 Shaftesbury Avenue

DRAWN: MZB	JOB NBR: 23555-02
SCALE: 1:150@A3	
DATE: 16/02/2024	
DWG NO: NSL-003	REV: -



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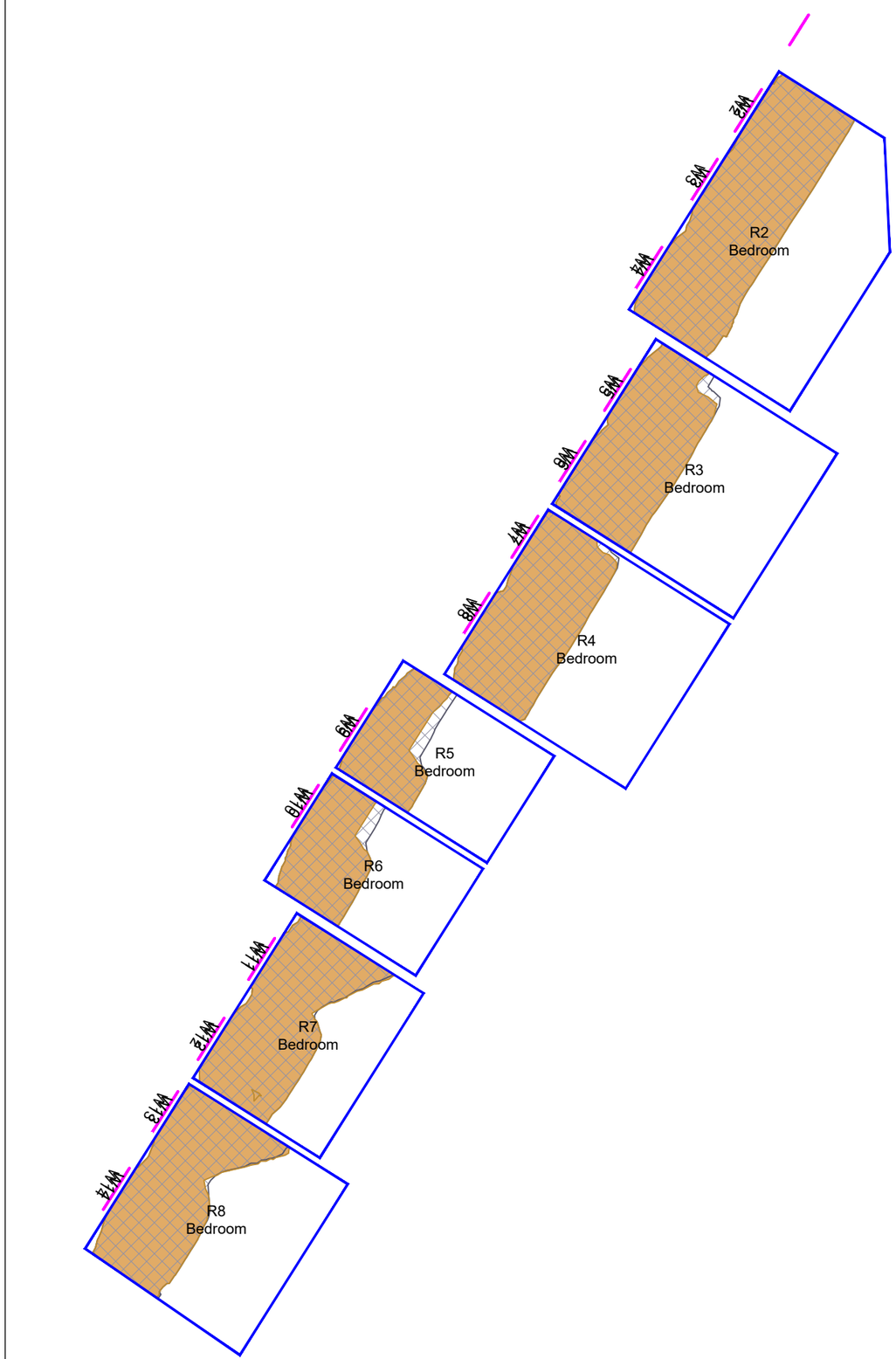


F01

NO DIMENSIONS TO BE SCALED FROM THIS DRAWING

KEY:

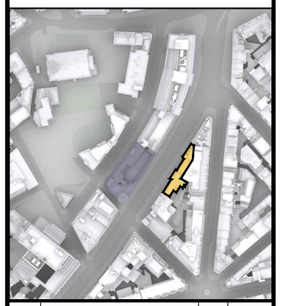
- Existing Lit Area
- Proposed Lit Area
- Area of Light Loss
- Area of Light Gain

SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS:
Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

NOTES:



REV	Description	Drawn	Date

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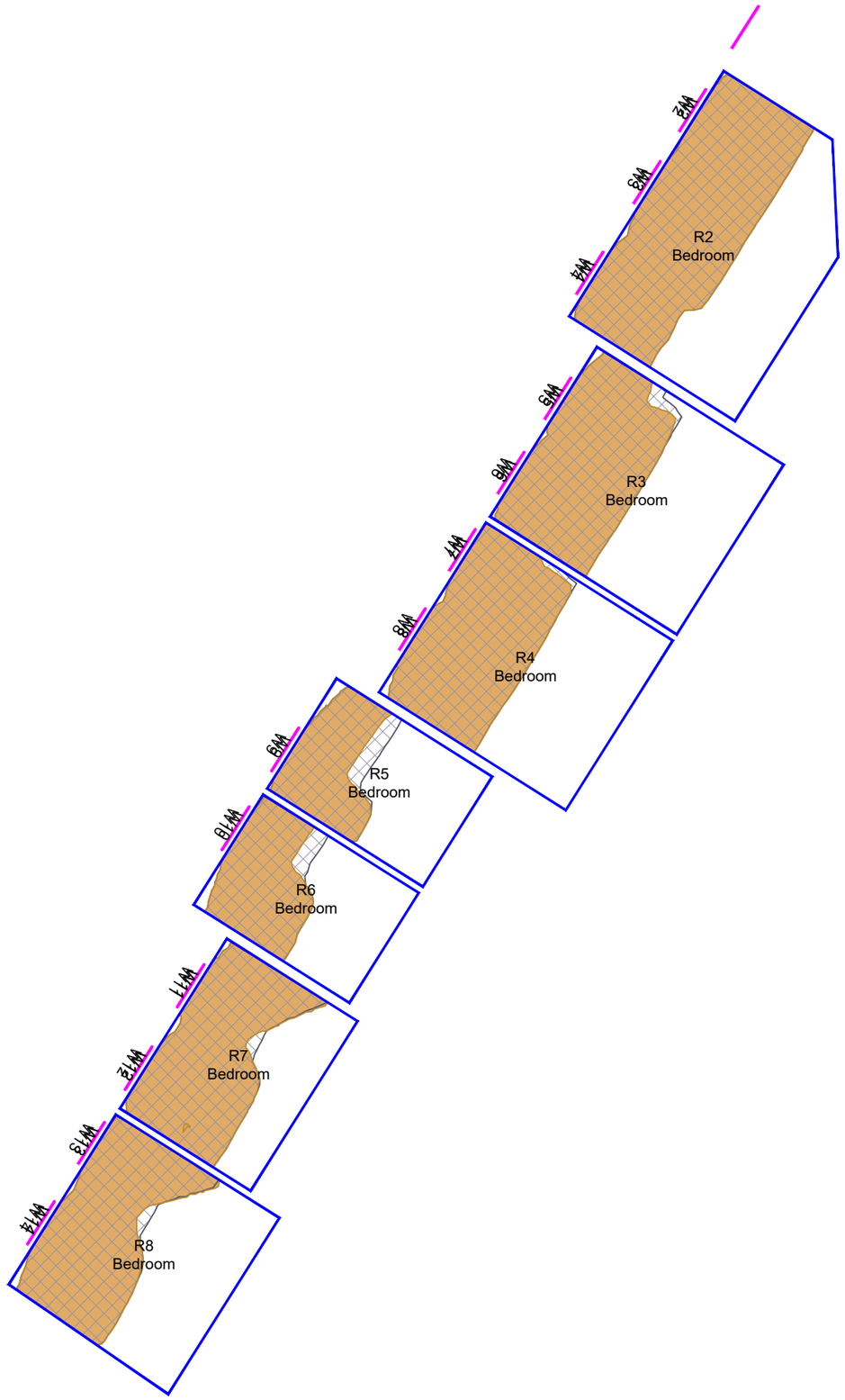
TITLE:

151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:

RIGHTS OF LIGHT CONTOURS
172-176 Shaftesbury Avenue

DRAWN: MZB	JOB NBR: 23555-02
SCALE: 1:150@A3	
DATE: 16/02/2024	
DWG NO: NSL-004 (1)	REV: -



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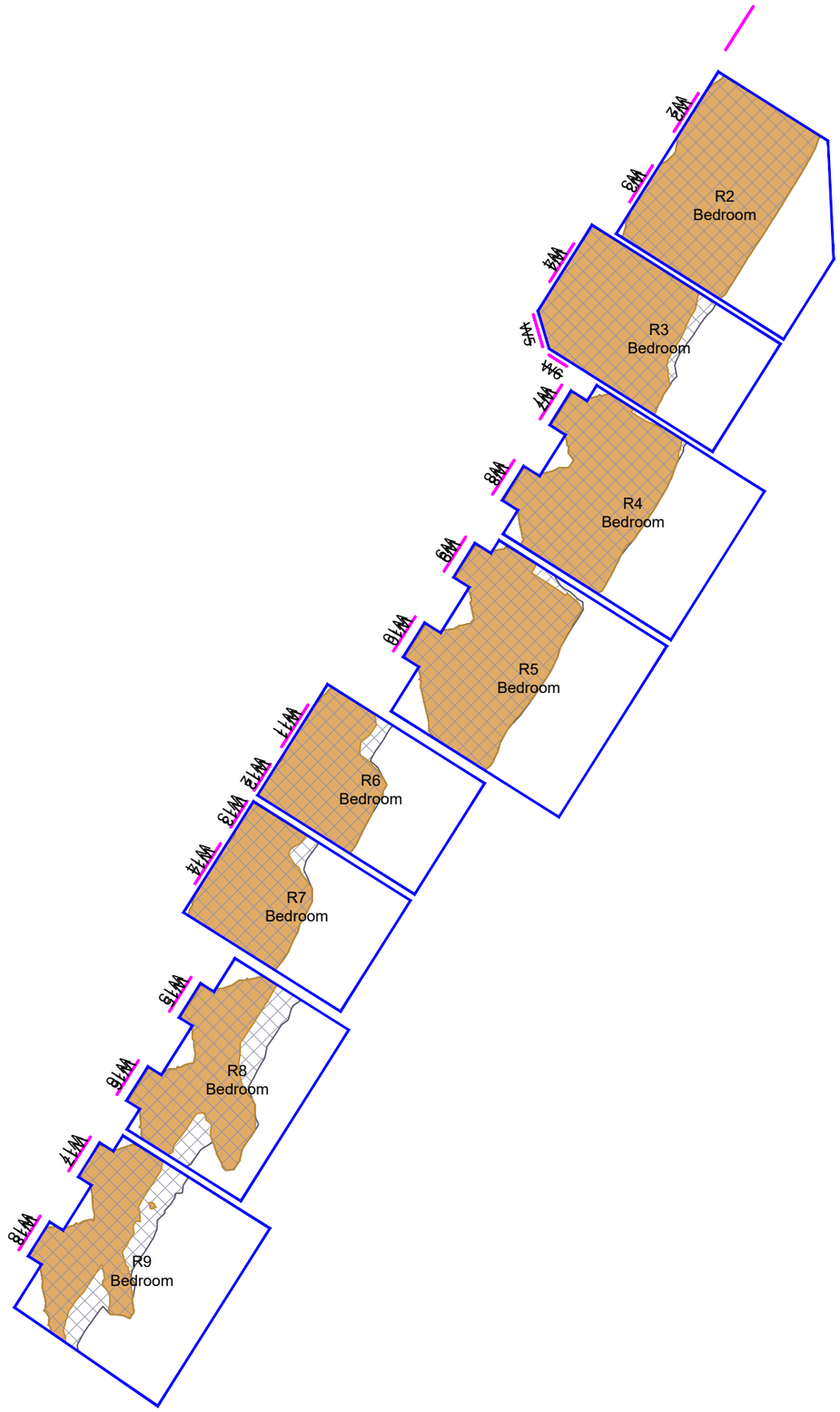


F03

NO DIMENSIONS TO BE SCALED FROM THIS DRAWING

KEY:

Existing Lit Area

Proposed Lit Area

Area of Light Loss

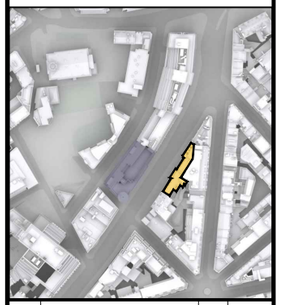
Area of Light Gain

SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS:
Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

NOTES:



REV	Description	Drawn	Date

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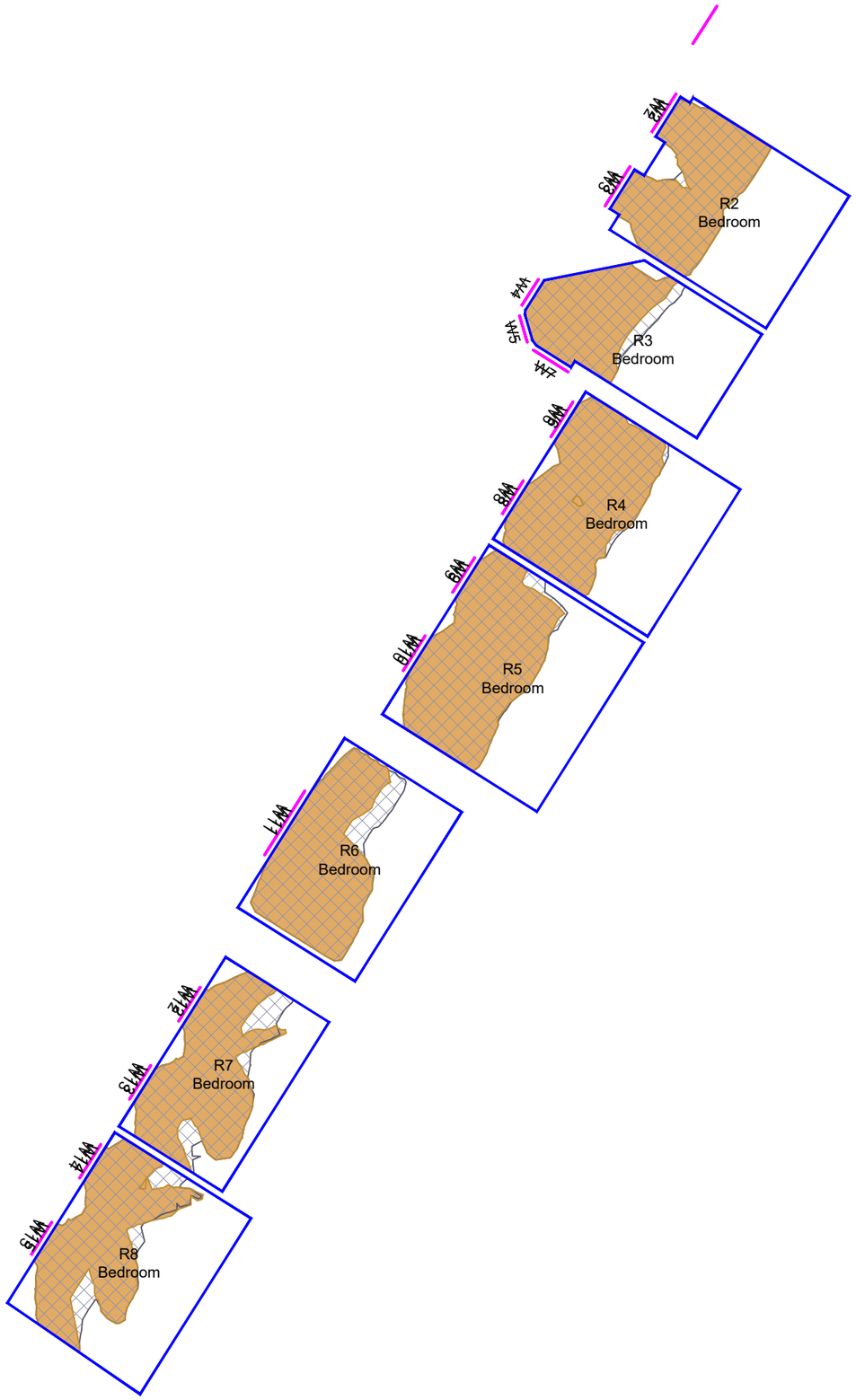
TITLE:

151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:

RIGHTS OF LIGHT CONTOURS
172-176 Shaftesbury Avenue

DRAWN: MZB	JOB NBR: 23555-02
SCALE: 1:150@A3	
DATE: 16/02/2024	
DWG NO: NSL-004 (2)	REV: -



F04

NO DIMENSIONS TO BE SCALED FROM THIS DRAWING

KEY:

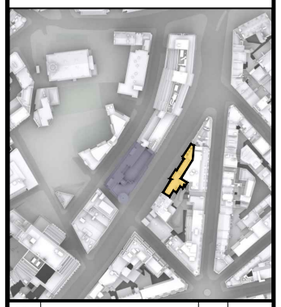
- Existing Lit Area
- Proposed Lit Area
- Area of Light Loss
- Area of Light Gain

SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS:
Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

NOTES:



REV	Description	Drawn	Date

DELVA PATMAN REDLER
Chartered Surveyors

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Bristol 0117 450 9703

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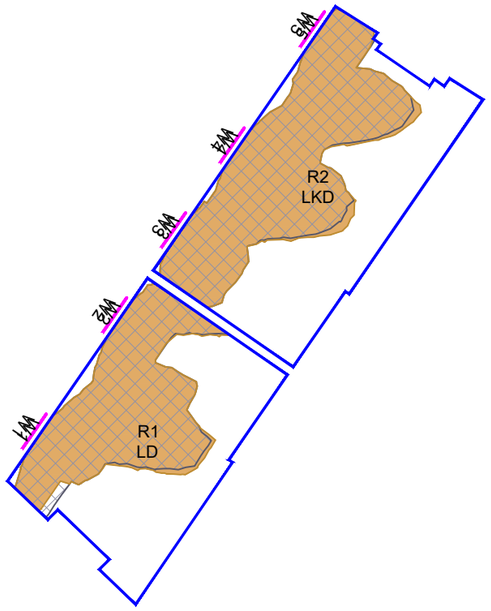
TITLE:

151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:

RIGHTS OF LIGHT CONTOURS
172-176 Shaftesbury Avenue

DRAWN: MZB	JOB NBR: 23555-02
SCALE: 1:150@A3	
DATE: 16/02/2024	
DWG NO: NSL-004 (3)	REV: -



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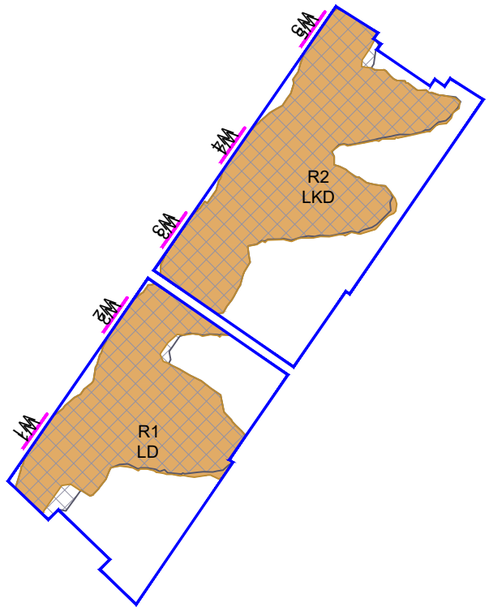
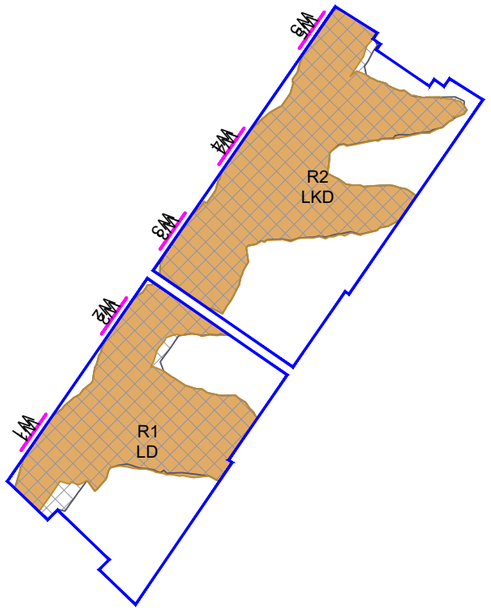


F02



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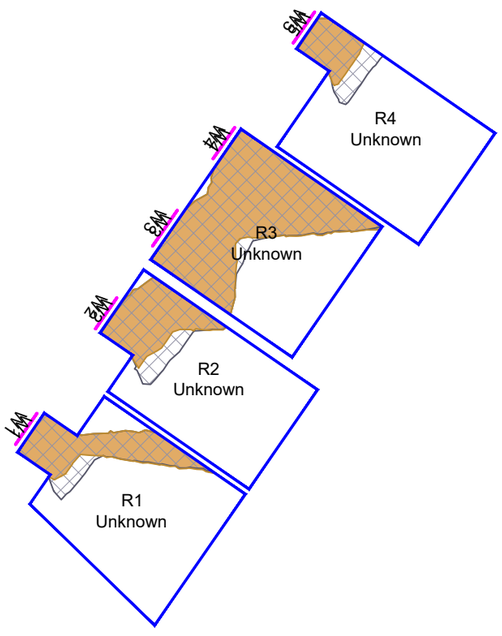

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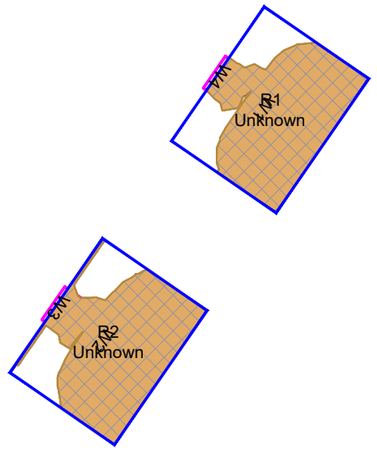


F05

NO DIMENSIONS TO BE SCALED FROM THIS DRAWING

KEY:

Existing Lit Area

Proposed Lit Area

Area of Light Loss

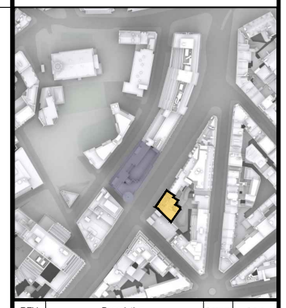
Area of Light Gain

SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS:
Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

NOTES:



REV	Description	Drawn	Date

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Chartered Surveyors

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Liverpool 0151 242 0980
Bristol 0117 450 9703

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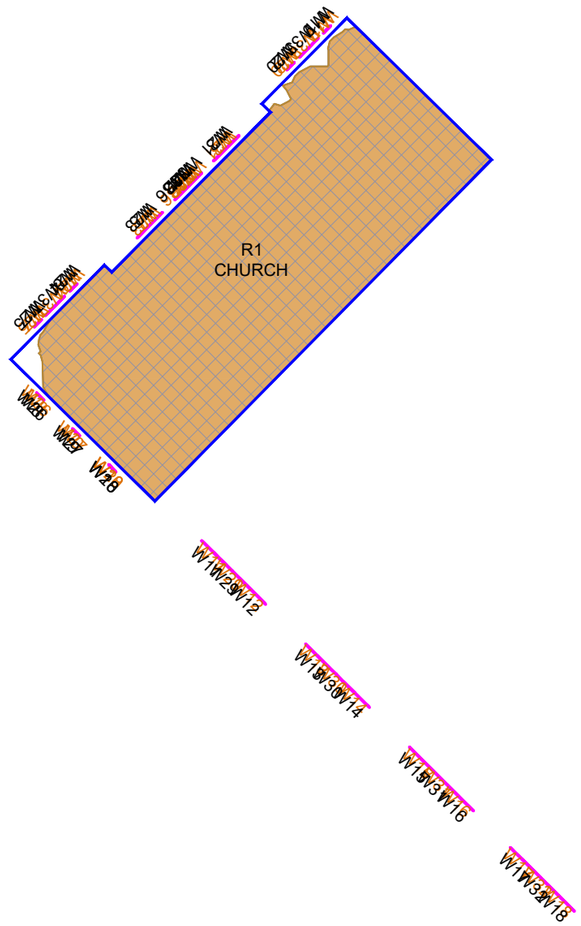
info@dpr.uk.com

TITLE:
151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:
RIGHTS OF LIGHT CONTOURS
166-170 Shaftesbury Avenue

DRAWN: MZB	JOB NBR: 23555-02
SCALE: 1:150@A3	
DATE: 16/02/2024	
DWG NO: NSL-005	REV: -

F00



F01

NO DIMENSIONS TO BE SCALED
FROM THIS DRAWING

KEY:

Existing Lit Area

Proposed Lit Area

Area of Light Loss

Area of Light Gain

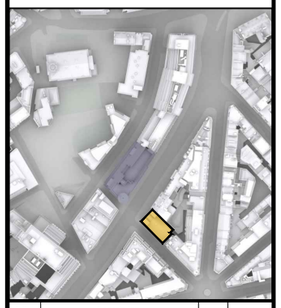
SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS:
Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

NOTES:

Windows on First floor also serve Ground



REV	Description	Drawn	Date

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Liverpool 0151 242 0980
Bristol 0117 450 9703

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info@dpr.uk.com

TITLE:

151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:

RIGHTS OF LIGHT CONTOURS
166A Shaftesbury Avenue

DRAWN: MZB	JOB NBR: 23555-02
SCALE: 1:150@A3	
DATE: 16/02/2024	
DWG NO: NSL-006	REV: -

Appendix 4

Sun-on-ground results for neighbouring amenity areas

NO DIMENSIONS TO BE SCALED FROM THIS DRAWING

KEY:

- Existing 2-Hr Sunlit Area
- Proposed 2-Hr Sunlit Area
- A02 — Amenity Area Number

SOURCE DATA:

EXISTING & SURROUNDING BUILDINGS:
Accucities 3d model received on 12/04/2022

ABC Survey received on 09/05/2022

PROPOSED BUILDINGS:
BGY Architects
Model Received on 31/01/2024
240131_151 Shaftesbury Ave

NOTES:

All heights given in m AOD

2hr SoG(Ex v Pr)

Property	Floor	Amenity ref.	Area (sq m)	Existing (sq m)	Proposed (sq m)	Existing (%)	Proposed (%)	Pro./Ex. (ratio)	Meets BRE?
Surroundings	F00	A1	1280.0	982.5	985.9	77	77	1.00	Yes
Surroundings	F00	A2	447.8	396.2	396.4	88	89	1.00	Yes
Surroundings	F00	A3	1500.1	1339.3	1339.1	89	89	1.00	Yes
		Total	3227.8	2718.0	2721.4	84	84	1.00	Yes

REV	Description	Drawn	Date

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Bristol 0117 450 9703

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info@dpr.uk.com

TITLE:

151 SHAFTESBURY AVENUE
LONDON
WC2H 8AL

DRAWING:

TWO-HOURS SUN-ON-GROUND STUDY
Existing Vs Proposed
March 21st

DRAWN: MZB
SCALE: NTS
DATE: 16/02/2024

JOB NBR: 23555-02

DWG NO: SOG-001

REV: -

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One George Yard
London
EC3V 9DF
020 7936 3668

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Liverpool
L3 1BG
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BS8 1HP
0117 450 9703

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Harcourt Centre
Block 4, Harcourt Road
Dublin
D02 HW77

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