

Our Ref: 00 ULS St Edmunds Terrace
7 November 2024

Mr N Sharpe
Callidus Planning Ltd
28 Landport Terrace
Portsmouth
PO1 2RG

Dear Nick

Re: 12022/5392/P - Searle House & Benjamin House, Cecil Grove, London, NW8 7EB

DAYLIGHT & SUNLIGHT

Urban Light Surveyors (ULS) are retained to advise on the Daylight and Sunlight (DLSL) aspects of the above proposed development.

We understand that there have been concerns raised by neighbours regarding the ULS DLSL report which was recently submitted as part of the above planning application.

We have reviewed a copy of the detailed objection received by the Local Planning Authority (LPA) on this matter, which we would respond to as follows:

Scope of Analysis

The ULS DLSL assessment analyses the impact of a new extension to block B vs the current DLSL values at the potentially affected neighbouring dwellings, as shown below.

Methodology & Approach

The assessments and reporting were based on the Building Research Establishment (BRE) best practice guidance¹ ("the BRE Guidelines"), which in turn is referred to by most LPAs in their planning policy. The introduction section clarifies that they are not mandatory.

As stated throughout the BRE Guidelines, any values quoted are purely advisory examples and are inherently flexible/ adaptable to the actual circumstances.

They refer to various examples of the types of situations where these advisory examples would be inappropriate and suggest methods for establishing alternative targets.

As such, the BRE do not seek to impose fixed targets or permissible limits.

¹ <https://www.brebookshop.com/details.jsp?id=328056>

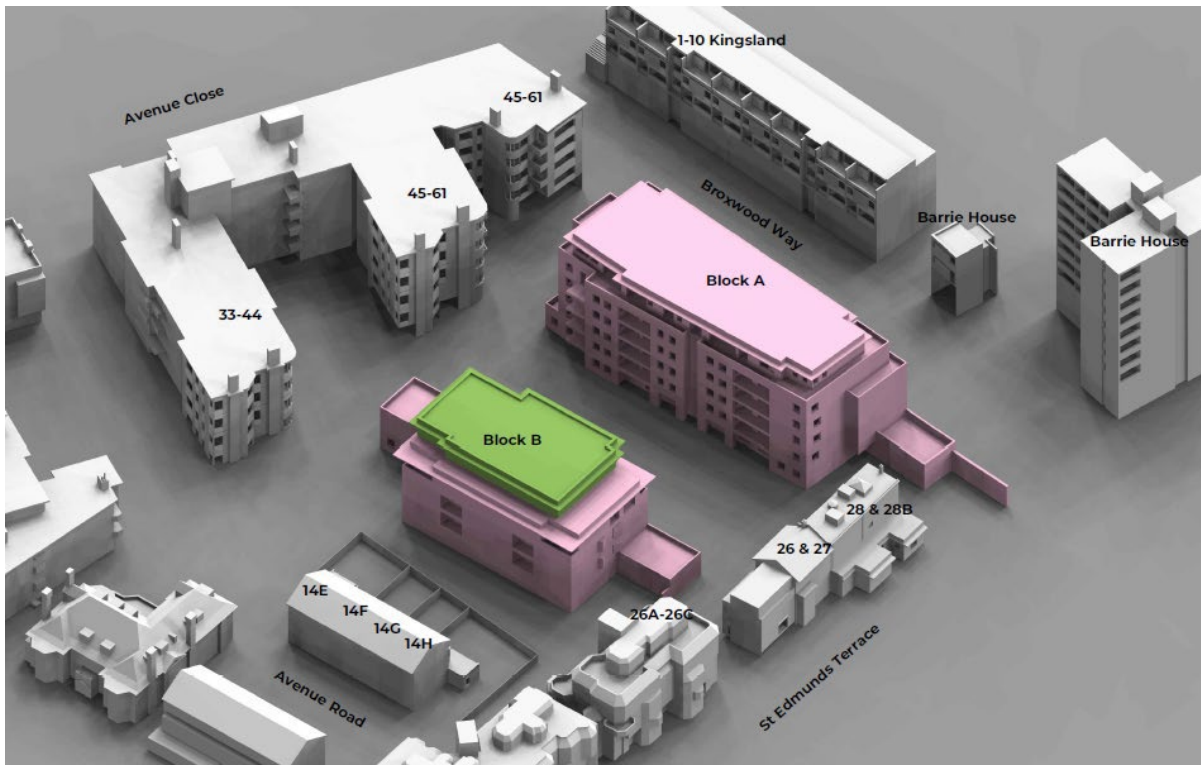


Figure 1: ULS DLSL analysis model showing proposed condition & assessment scope

Assessment Findings

As set out in the BRE Guidelines, the main method of assessing potential daylight impacts to existing neighbours is by use of the Vertical Sky Component (VSC) analysis.

Comparing the current and proposed VSC results for the houses at 14E-14H show between 0% (no change) and at most 1.73% VSC difference, an average of 0.8%VSC across the run of houses.

This is a very small change on average and in many cases no change from the current VSC values.

As such in our view it represents a no-worsening of the baseline.

For 26&27 St Edmunds Terrace the VSC change is even smaller, ranging from 0% – 0.86%VSC at most, an average alteration of 0.4%VSC, i.e. extremely small.

The BRE Guidelines offer advice regarding not incrementally applying their 20% rule of thumb, in respect of consents which are never built (para F2).

Para 2.2.15 of the BRE Guidelines also refers to “minimising the impact” to an existing property, particularly where successive extensions are planned to the same building.

Given the lack of any significant change from the baseline condition, the current extension has minimised the overall/ cumulative effect to its neighbours, in many cases having no effect at all to the baseline condition.

Assumptions

It is accepted by the BRE that it is impractical to measure every neighbouring property, hence their emphasis on the externally assessed VSC and APSH metrics.

It is therefore standard practice to adopt reasonable assumptions.

The assumptions which ULS applied are rigorous and based on principles which are consistently applied to all of the assessments we undertake of this type.

I can confirm that relevant external obstructions on neighbouring properties such as projecting eaves were fully taken into account in our analyses.

I trust the foregoing is clear and useful, please do not hesitate if you require anything further.

Yours sincerely



Gregory Francis

Director

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For and on behalf of Urban Light Surveyors Limited