Emily Forth GIA The Whitehouse 9A Belvedere Road London SE1 8GA



17 SLINGSBY PLACE LONDON | WC2E 9AB

(Our Ref: 1382)

15th November 2020

Dear Emily,

RE: THE PROPOSED DEVELOPMENT AT 13 BLACKBURN ROAD, LONDON, AND ITS EFFECT UPON THE SITE AT 14 BLACKBURN ROAD – DAYLIGHT AND SUNLIGHT

I am writing in response to the letter of objection received from yourself on behalf of Hampstead Asset Management Limited (HAML), dated 09/10/20 and with regards to planning application reference 2020/2940/P. The purpose of the note herein is to address the comments and queries raised with regards to daylight and sunlight at 14 Blackburn Road.

The objection letter states that HAML is concerned with the impact of the proposed 13 Blackburn Road scheme to their implemented planning consent, which is located opposite, dated 2004 and recommends that Point 2 undertake a daylight analysis in connection with both schemes. To this end, Point 2 has undertaken a full analysis of Average Daylight Factor (ADF) levels within the consented 14 Blackburn Road scheme before and after construction of the redevelopment proposal, the results of which are appended below.

An assessment of ADF levels is considered to be the most appropriate method of analysis, in accordance with BRE Guidance, as the scheme at 14 Blackburn Road has not yet been constructed. Both Vertical Sky Component (VSC) and No Sky Line (NSL) daylight methodologies outlined by the BRE are reserved only for existing buildings as they are comparative in nature, i.e. are used primarily to determine whether the occupants of a building will notice a change in their light. Given that there are no occupants here, these methodologies are redundant in this instance.

As can be seen from the ADF results appended below, a total of 46 site-facing rooms have been included for assessment. Of these 46 rooms, 8 rooms are small ground floor kitchens of 9 sq. m. in area (please refer to plot 1382/NSL/01). These would have below British Standard light before the proposed 13 Blackburn Road scheme is constructed (in a range of 0.57% - 0.75% ADF compared to the recommended 2% for new kitchens). These are reduced further by the scheme proposal.

However the Mayor's Supplementary Planning Guidance (SPG) document dated March 2016 states at 1.3.19 that:

"There is no statutory definition for kitchens to be counted as a habitable room, nor is there any statutory size threshold. Many boroughs, however, include a figure of between 13 and 15 square meters in LDFs: any kitchen above that minimum is usually counted as a habitable room. Generally, a kitchen with a small table and chairs in one corner, or a kitchen 'bar', would not be counted as a

habitable room. A room with a clearly defined kitchen at one end and a clearly defined dining area at the other (with a dining table and chairs) would be counted as a habitable room "

This is confirmed by the Planning Inspector's report for Graphite Square in LB Lambeth (at appeal), also appended, which states at paragraph 22:

"Second, I accept the appellant's point that many of the affected kitchens.....are too small to qualify as habitable rooms for the purpose of the calculations".

Given that the kitchens in the Appeal (above) were no smaller than the kitchens within the consented 14 Blackburn Road scheme it is questionable as to whether their light requires consideration at all. In addition the fact that each unit within the 14 Blackburn Road scheme is also served by a separate non-site-facing living/dining room we believe it is reasonable to discount the north facing kitchens from the assessment in line with the Mayor's Planning Guidance.

Furthermore each of the 8 kitchens are served by one small, north-facing window of no greater than 70cm in height (please refer to window map 1382/WM/07A). The quality of light amenity within any rooms in this location could therefore be improved simply by increasing the size of the apertures serving them, which is fully within the developer's control. As HAML have already noted that they are actively preparing revised proposals for the 14 Blackburn Road site, it should be possible to ensure that any new site-facing rooms contain enough glazing to facilitate a greater amount of daylight than that which was previously deemed acceptable, even with the proposed 14 Blackburn Road scheme in situ.

With regards to the other 38 assessed rooms, all but 4 will exceed the recommended ADF daylight level for their respective usages with the proposed 13 Blackburn Road scheme constructed. The remaining 4 rooms all comprise bedrooms which will have below British Standard light levels without the 13 Blackburn Road proposal in situ (each has an ADF of between 0.4% - 0.56% compared to a recommended minima of 1.0%). Construction of the proposed scheme would result in these rooms experiencing tiny absolute losses in ADF in a range of 0.01% to 0.04%, which would be an imperceptible level of change.

It is therefore possible to conclude from this assessment that the proposed 13 Blackburn Road scheme does not unreasonably restrict the availability of daylight to the Consented 14 Blackburn Road scheme both in terms of the current implemented consent nor any other future proposal for the site, subject to sensible layout and design.

I hope the above note addresses some if not all of your client's concerns and we would be happy to engage further with you in any way necessary to arrive at an amicable outcome for both parties.

Yours sincerely

Georgina Mann Senior Surveyor

For and on behalf of Point 2 Surveyors Limited

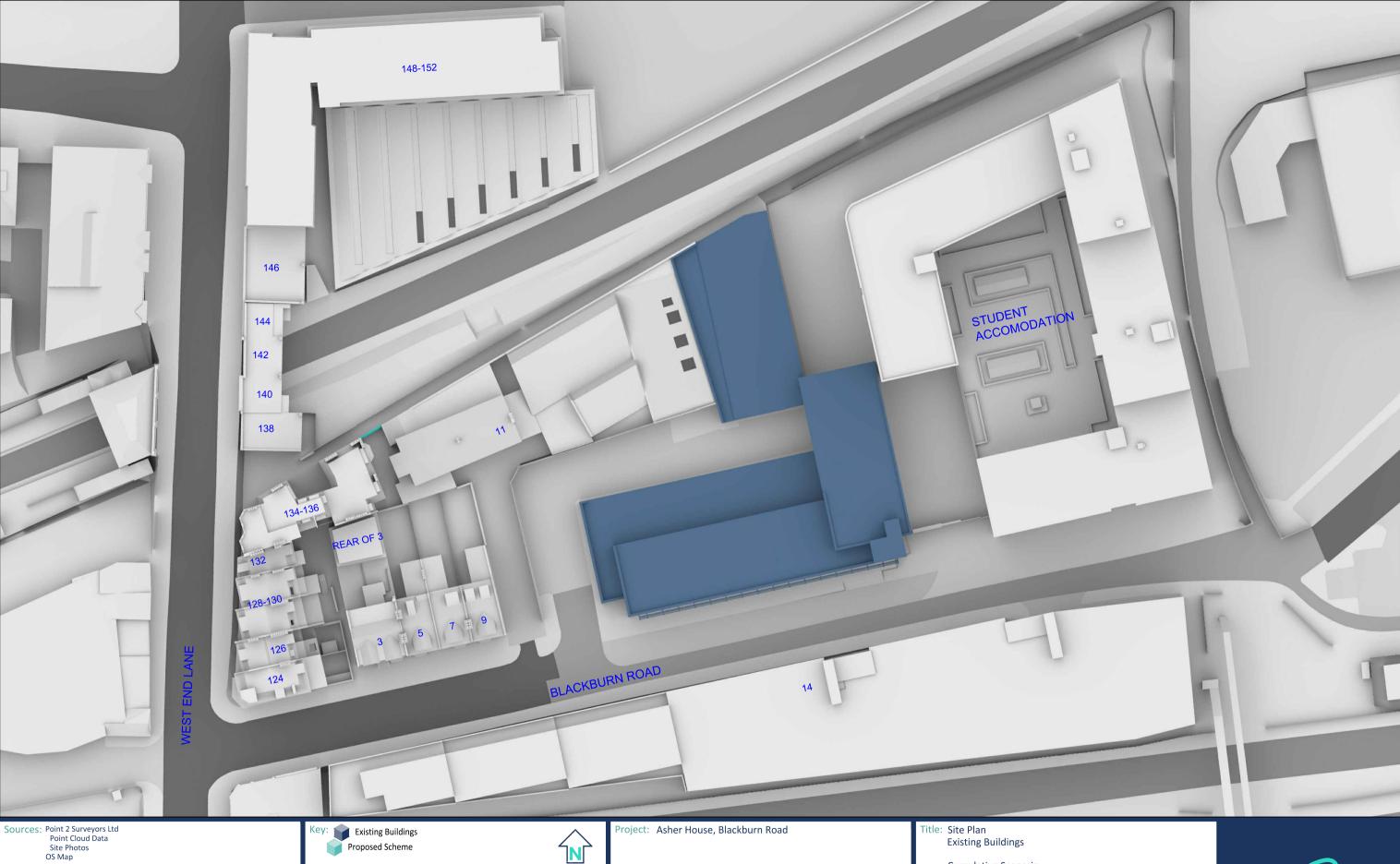
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Cc Barry Hood - Point 2 Surveyors Jacob Loftus - General Projects Grant Leggett - General Projects





Stiff + Trevillion Architects Ltd

Proposed Scheme Received 27/05/20 File Name: 4153-200522-MainModel_2010.dwg



Cumulative Scenario Option 02 14 Blackburn Road

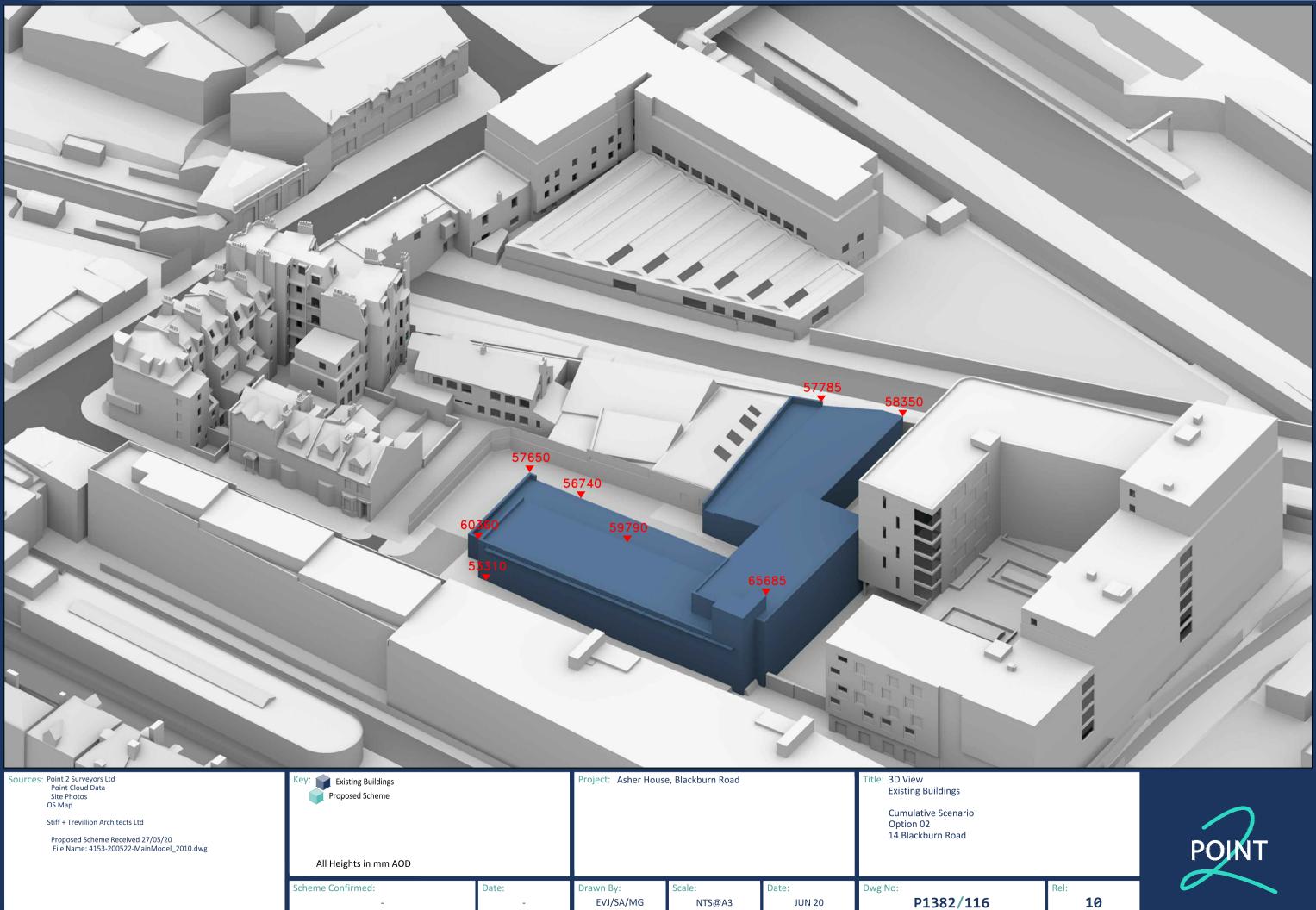


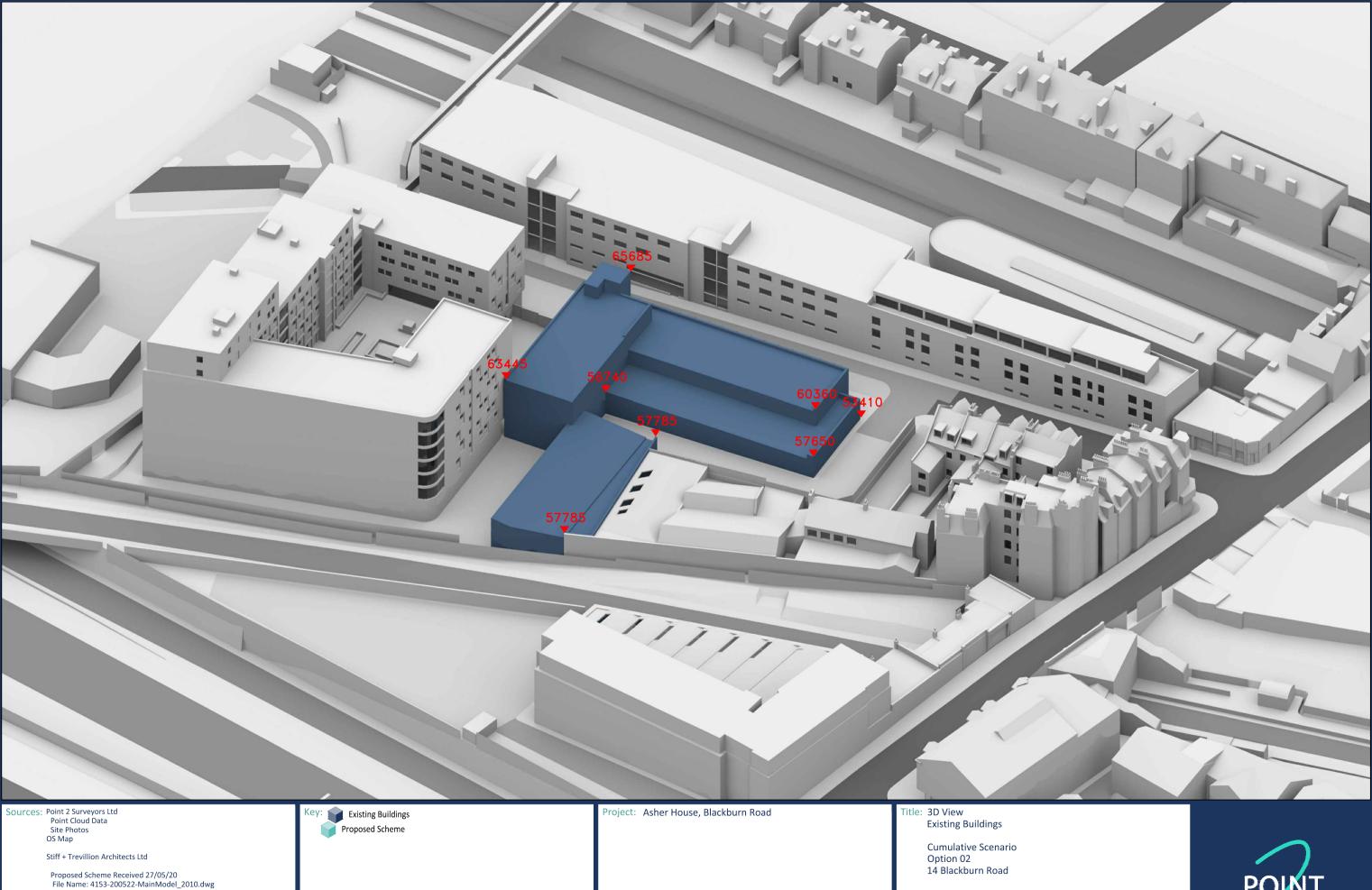
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All Heights in mm AOD

Date:

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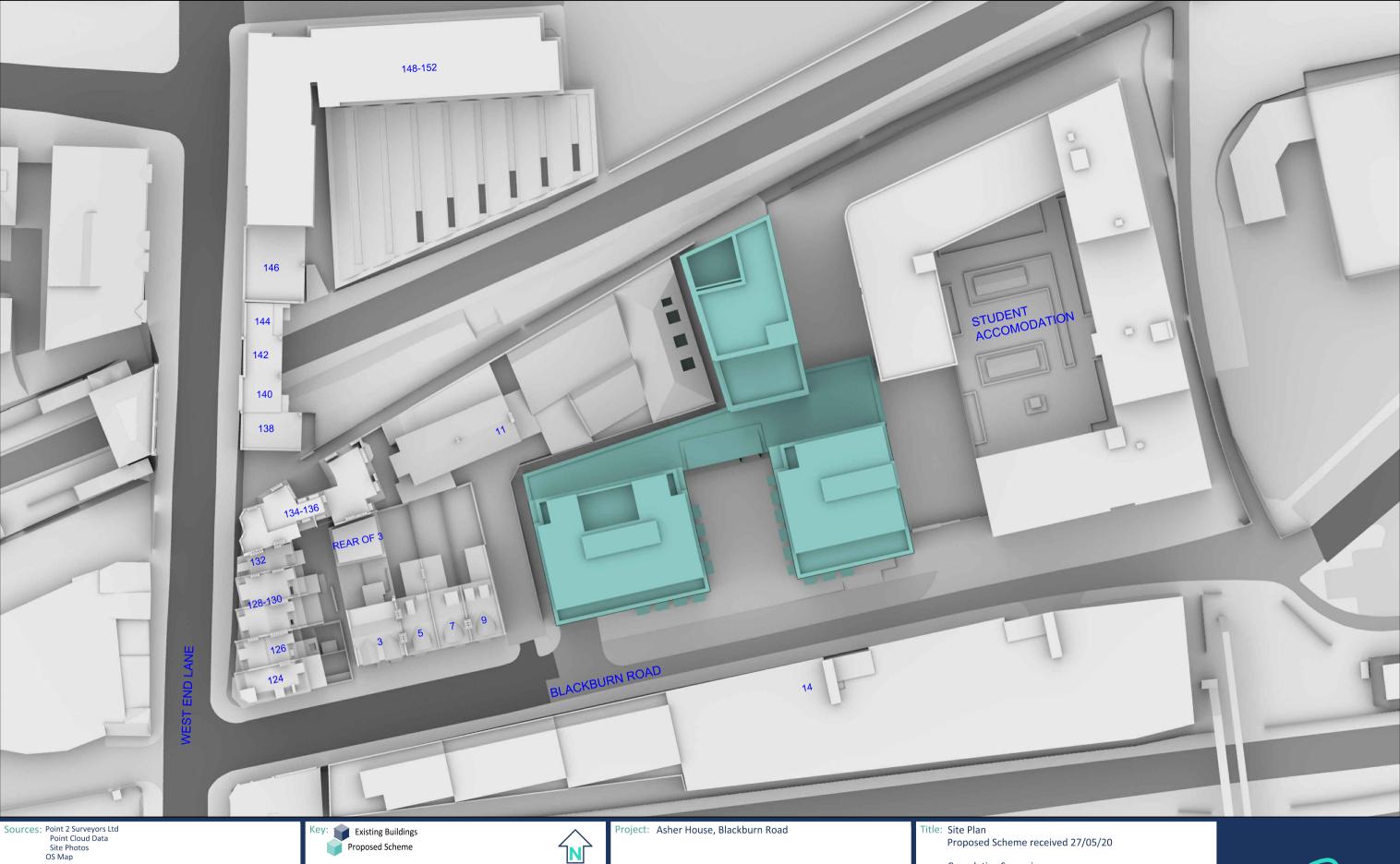
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Scheme Confirmed:

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Proposed Scheme Received 27/05/20 File Name: 4153-200522-MainModel_2010.dwg

Proposed Scheme Received 04/06/20 File Name: 4153-ST-PR-02-(099-109).dwg 4153-ST-PR-03-(100-105).dwg 4153-ST-PR-04-(100-104).dwg



Cumulative Scenario Option 02 14 Blackburn Road



Scheme Confirmed:

Date:

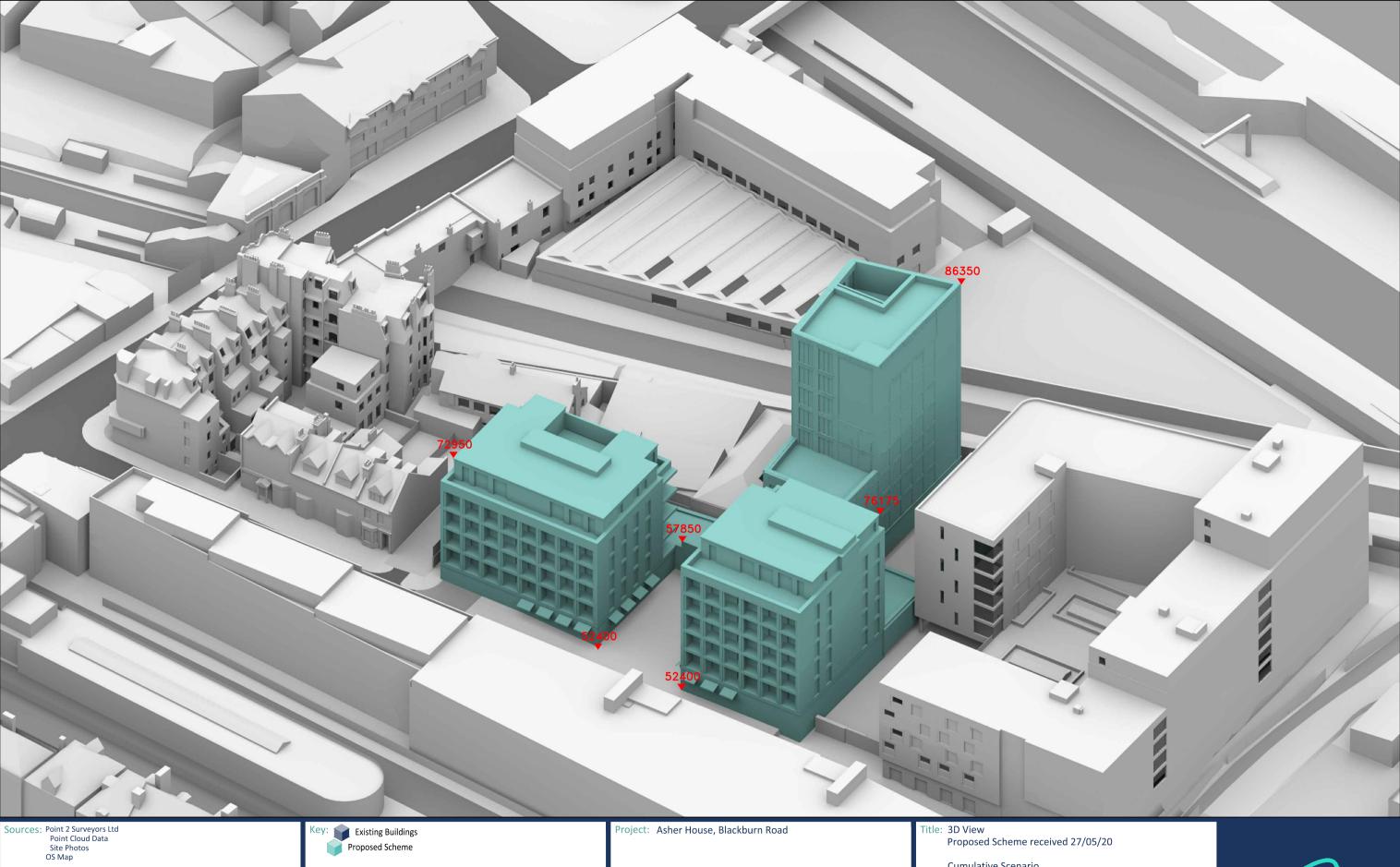
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Proposed Scheme Received 27/05/20 File Name: 4153-200522-MainModel_2010.dwg

Proposed Scheme Received 04/06/20 File Name: 4153-ST-PR-02-(099-109).dwg 4153-ST-PR-03-(100-105).dwg 4153-ST-PR-04-(100-104).dwg

All Heights in mm AOD

Date:

Drawn By:

EVJ/SA/MG

Scheme Confirmed:

NTS@A3

Cumulative Scenario Option 02

P1382/119

14 Blackburn Road

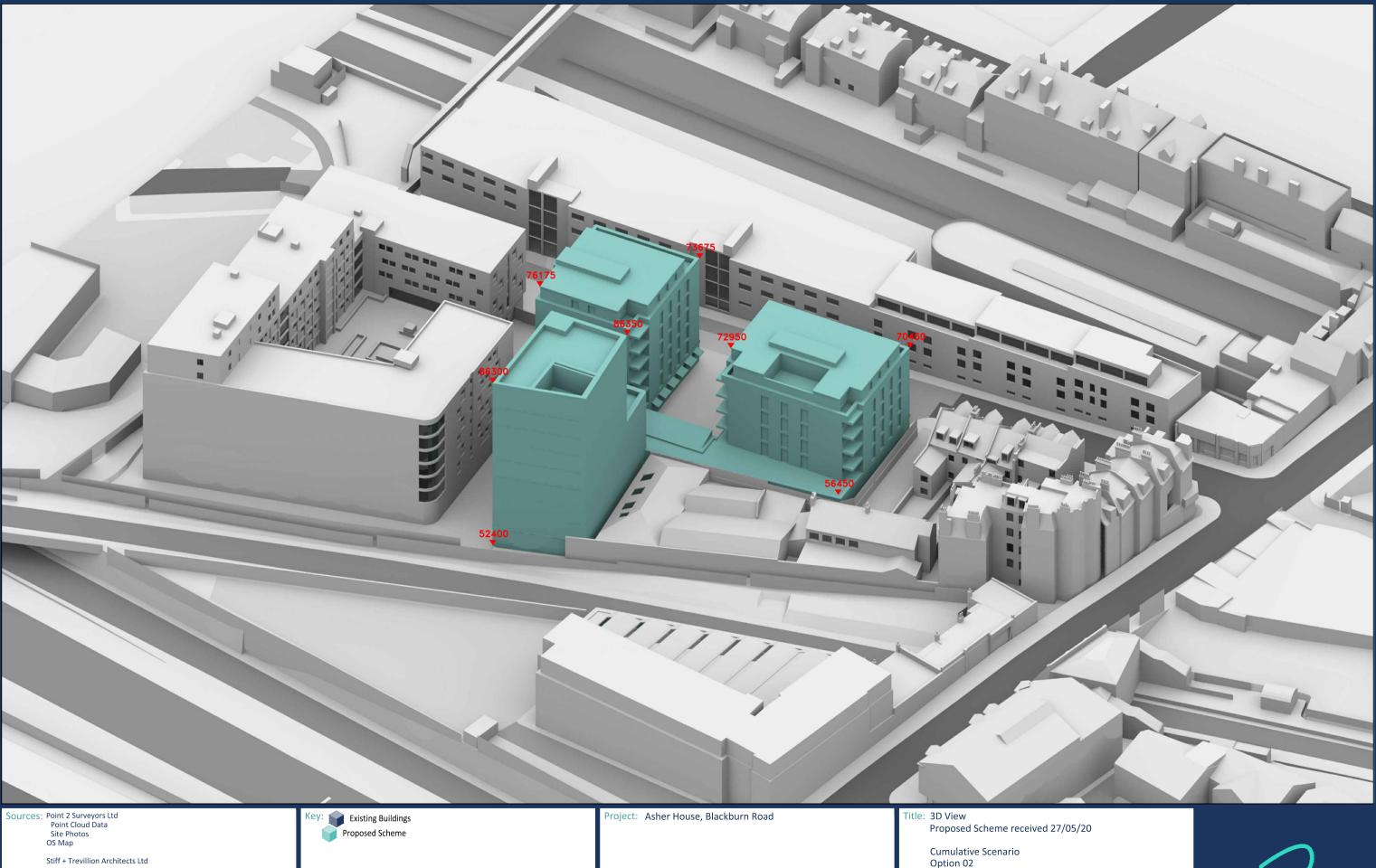


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Dwg No:

JUN 20



Proposed Scheme Received 27/05/20 File Name: 4153-200522-MainModel_2010.dwg

Proposed Scheme Received 04/06/20 File Name: 4153-ST-PR-02-(099-109).dwg 4153-ST-PR-03-(100-105).dwg 4153-ST-PR-04-(100-104).dwg

All Heights in mm AOD

Date:

Drawn By:

EVJ/SA/MG

Scheme Confirmed:

NTS@A3

Option 02 14 Blackburn Road

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Dwg No:

JUN 20



ASHER HOUSE, BLACKBURN ROAD **PROPOSED SCHEME** 27/05/20 **Cumulative Scenario**

Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss	
14 Blackburn Road (Cumulative)							
R1/860	KITCHEN	W1/860	29.58	15.00	14.58	49.29	
R2/860	KITCHEN	W2/860	30.88	16.78	14.10	45.66	
R3/860	KITCHEN	W3/860	31.12	18.32	12.80	41.13	
R4/860	KITCHEN	W4/860	30.69	21.49	9.20	29.98	
R1/861	BEDROOM	W1/861	33.79	17.90	15.89	47.03	
R2/861	BEDROOM	W2/861	34.22	19.76	14.46	42.26	
R3/861	BEDROOM	W3/861	34.32	21.39	12.93	37.67	
R4/861	BEDROOM	W4/861	33.69	24.84	8.85	26.27	
R1/862	BEDROOM	W1/862	36.47	20.83	15.64	42.88	
R2/862	BEDROOM	W2/862	36.35	22.56	13.79	37.94	
R3/862	BEDROOM	W3/862	36.27	24.13	12.14	33.47	
R4/862	BEDROOM	W4/862	35.66	27.62	8.04	22.55	
R1/863	HABITABLE	W1/863	36.44	26.21	10.23	28.07	
R2/863	HABITABLE	W2/863	36.73	27.33	9.40	25.59	
R3/863	HABITABLE	W3/863	36.61	28.95	7.66	20.92	
R4/863	HABITABLE	W4/863	36.24	30.59	5.65	15.59	
R1/870	KITCHEN	W1/870	30.41	22.37	8.04	26.44	
R2/870	KITCHEN	W2/870	27.98	22.33	5.65	20.19	
R3/870	KITCHEN	W3/870	26.68	21.94	4.74	17.77	
R4/870	KITCHEN	W4/870	24.44	21.92	2.52	10.31	



ASHER HOUSE, BLACKBURN ROAD **PROPOSED SCHEME** 27/05/20 **Cumulative Scenario**

			Existing	Proposed	Dranasad		
Room	Room Use	Window	VSC	VSC	Loss	%Loss	
R1/871	BEDROOM	W1/871	33.54	26.06	7.48	22.30	
R2/871	BEDROOM	W2/871	31.84	26.70	5.14	16.14	
R3/871	BEDROOM	W3/871	30.90	26.64	4.26	13.79	
R4/871	BEDROOM	W4/871	29.15	26.79	2.36	8.10	
R1/872	BEDROOM	W1/872	35.51	28.90	6.61	18.61	
R2/872	BEDROOM	W2/872	34.42	29.99	4.43	12.87	
R3/872	BEDROOM	W3/872	33.80	30.17	3.63	10.74	
R4/872	BEDROOM	W4/872	32.58	30.43	2.15	6.60	
R1/873	HABITABLE	W1/873	37.05	32.73	4.32	11.66	
R2/873	HABITABLE	W2/873	36.74	33.43	3.31	9.01	
R3/873	HABITABLE	W3/873	36.38	33.94	2.44	6.71	
R4/873	HABITABLE	W4/873	35.55	33.79	1.76	4.95	
R1/880	BEDROOM	W1/880	25.08	23.37	1.71	6.82	
R3/880	BEDROOM	W3/880	24.19	23.05	1.14	4.71	
R4/880	BEDROOM	W4/880	23.54	22.84	0.70	2.97	
R5/880	BEDROOM	W5/880	23.19	22.62	0.57	2.46	
R1/881	BEDROOM	W1/881	29.79	28.16	1.63	5.47	
R3/881	BEDROOM	W3/881	28.88	27.79	1.09	3.77	
R4/881	BEDROOM	W4/881	28.02	27.27	0.75	2.68	
R5/881	BEDROOM	W5/881	27.65	27.00	0.65	2.35	



ASHER HOUSE, BLACKBURN ROAD **PROPOSED SCHEME** 27/05/20 **Cumulative Scenario**

Option 02 / 14 Blackburn Road

P1382 - rel10

Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
R1/882	BEDROOM	W1/882	33.06	31.56	1.50	4.54
R3/882	BEDROOM	W3/882	32.24	31.19	1.05	3.26
R4/882	BEDROOM	W4/882	31.34	30.55	0.79	2.52
R5/882	BEDROOM	W5/882	30.98	30.26	0.72	2.32
R1/883	BEDROOM	W1/883	36.09	34.89	1.20	3.33
R2/883 R2/883	BEDROOM BEDROOM	W2/883 W3/883	35.91 35.71	34.83 34.74	1.08 0.97	3.01 2.72



ASHER HOUSE, BLACKBURN ROAD **PROPOSED SCHEME** 27/05/20 **Cumulative Scenario**

Room	Room Use	Window	Existing ADF Total		Propo ADF	Proposed ADF Total		%Loss	
			ADI	Total	ADI	Total			
14 Blackburn F	Road (Cumulative)								
R1/860	KITCHEN	W1/860	0.71	0.71	0.26	0.26	0.45	63.39	
R2/860	KITCHEN	W2/860	0.75	0.75	0.34	0.34	0.40	54.09	
R3/860	KITCHEN	W3/860	0.75	0.75	0.40	0.40	0.35	46.73	
R4/860	KITCHEN	W4/860	0.74	0.74	0.50	0.50	0.24	32.79	
R1/861	BEDROOM	W1/861	1.77	1.77	1.08	1.08	0.69	38.79	
R2/861	BEDROOM	W2/861	1.79	1.79	1.17	1.17	0.62	34.49	
R3/861	BEDROOM	W3/861	1.78	1.78	1.24	1.24	0.54	30.54	
R4/861	BEDROOM	W4/861	1.75	1.75	1.38	1.38	0.37	21.36	
R1/862	BEDROOM	W1/862	1.70	1.70	1.08	1.08	0.62	36.36	
R2/862	BEDROOM	W2/862	1.69	1.69	1.15	1.15	0.54	31.85	
R3/862	BEDROOM	W3/862	1.68	1.68	1.21	1.21	0.47	28.01	
R4/862	BEDROOM	W4/862	1.65	1.65	1.34	1.34	0.32	19.07	
R1/863	HABITABLE	W1/863	3.90	3.90	3.04	3.04	0.86	21.98	
R2/863	HABITABLE	W2/863	3.93	3.93	3.13	3.13	0.80	20.30	
R3/863	HABITABLE	W3/863	3.93	3.93	3.28	3.28	0.65	16.54	
R4/863	HABITABLE	W4/863	3.86	3.86	3.37	3.37	0.49	12.62	
R1/870	KITCHEN	W1/870	0.73	0.73	0.52	0.52	0.21	28.63	
R2/870	KITCHEN	W2/870	0.67	0.67	0.52	0.52	0.15	22.57	
R3/870	KITCHEN	W3/870	0.64	0.64	0.51	0.51	0.13	20.00	
R4/870	KITCHEN	W4/870	0.57	0.57	0.50	0.50	0.07	12.04	



ASHER HOUSE, BLACKBURN ROAD **PROPOSED SCHEME** 27/05/20 **Cumulative Scenario**

Poom	Room Use	Window	Exis	ting	Proposed		Total Loss	%Loss
Room	Room Use	window	ADF	Total	ADF	Total	TOTAL LOSS	%LUSS
R1/871	BEDROOM	W1/871	1.78	1.78	1.46	1.46	0.32	17.98
R2/871	BEDROOM	W2/871	1.70	1.70	1.48	1.48	0.22	12.93
R3/871	BEDROOM	W3/871	1.65	1.65	1.48	1.48	0.18	10.76
R4/871	BEDROOM	W4/871	1.57	1.57	1.48	1.48	0.10	6.10
R1/872	BEDROOM	W1/872	1.55	1.55	1.31	1.31	0.25	15.81
R2/872	BEDROOM	W2/872	1.51	1.51	1.34	1.34	0.17	10.96
R3/872	BEDROOM	W3/872	1.48	1.48	1.34	1.34	0.13	9.01
R4/872	BEDROOM	W4/872	1.43	1.43	1.35	1.35	0.08	5.40
R1/873	HABITABLE	W1/873	4.61	4.61	4.19	4.19	0.42	9.20
R2/873	HABITABLE	W2/873	4.59	4.59	4.27	4.27	0.32	7.05
R3/873	HABITABLE	W3/873	4.57	4.57	4.33	4.33	0.24	5.21
R4/873	HABITABLE	W4/873	4.52	4.52	4.34	4.34	0.17	3.83
R1/880	BEDROOM	W1/880	0.55	0.55	0.51	0.51	0.04	7.64
R3/880	BEDROOM	W3/880	0.59	0.59	0.56	0.56	0.03	5.12
R4/880	BEDROOM	W4/880	0.41	0.41	0.40	0.40	0.01	1.72
R5/880	BEDROOM	W5/880	0.50	0.50	0.49	0.49	0.01	2.19
R1/881	BEDROOM	W1/881	1.99	1.99	1.91	1.91	0.08	4.16
R3/881	BEDROOM	W3/881	1.15	1.15	1.13	1.13	0.03	2.34
R4/881	BEDROOM	W4/881	2.18	2.18	2.14	2.14	0.04	1.75
R5/881	BEDROOM	W5/881	1.44	1.44	1.42	1.42	0.02	1.46



ASHER HOUSE, BLACKBURN ROAD **PROPOSED SCHEME** 27/05/20 **Cumulative Scenario**

Option 02 / 14 Blackburn Road

P1382 - rel10

Room Room Use		Window	Existing		Proposed		Total Loss	%Loss	
KOOIII	Room Ose	Williaow	ADF	Total	ADF	Total	TOtal LOSS	/0LU33	
R1/882	BEDROOM	W1/882	1.80	1.80	1.73	1.73	0.07	3.68	
R3/882	BEDROOM	W3/882	1.05	1.05	1.02	1.02	0.02	2.20	
R4/882	BEDROOM	W4/882	1.97	1.97	1.93	1.93	0.04	1.83	
R5/882	BEDROOM	W5/882	1.30	1.30	1.28	1.28	0.02	1.69	
R1/883	BEDROOM	W1/883	4.15	4.15	4.03	4.03	0.12	2.92	
R2/883 R2/883	BEDROOM BEDROOM	W2/883 W3/883	0.97 4.27	5.24	0.95 4.18	5.13	0.11	2.16	



NSL ANALYSIS

ASHER HOUSE, BLACKBURN ROAD **PROPOSED SCHEME** 27/05/20

		Cur	nulative Scenari	io		
		Option 0	2 / 14 Blackbur	n Road		
Room	Room Use	Whole Room sq ft	Existing sq ft	Proposed sq ft	Loss sq ft	%Loss
			NSL			
14 Blackburn Roa	nd (Cumulative)					
R1/860	KITCHEN	99.0	86.2	25.4	60.8	70.5
R2/860	KITCHEN	99.0	96.3	36.0	60.3	62.6
R3/860	KITCHEN	99.1	96.5	66.3	30.2	31.3
R4/860	KITCHEN	99.0	96.3	90.8	5.6	5.8
R1/861	BEDROOM	152.1	146.6	71.0	75.6	51.6
R2/861	BEDROOM	152.5	146.0	103.7	42.3	29.0
R3/861	BEDROOM	153.4	148.0	92.0	56.0	37.8
R4/861	BEDROOM	153.5	146.9	144.1	2.7	1.8
R1/862	BEDROOM	152.1	146.6	70.1	76.6	52.3
R2/862	BEDROOM	152.5	146.0	103.8	42.2	28.9
R3/862	BEDROOM	153.4	148.0	91.2	56.8	38.4
R4/862	BEDROOM	153.5	146.9	144.1	2.7	1.8
R1/863	HABITABLE	167.8	167.8	155.6	12.2	7.3
R2/863	HABITABLE	168.2	168.2	140.7	27.5	16.3
R3/863	HABITABLE	168.7	168.7	165.8	2.9	1.7
R4/863	HABITABLE	171.8	171.8	171.8	0.0	0.0
R1/870	KITCHEN	99.0	95.8	95.7	0.1	0.1
R2/870	KITCHEN	99.0	77.5	77.3	0.3	0.4
R3/870	KITCHEN	99.0	50.6	50.6	0.0	0.0
R4/870	KITCHEN	99.0	37.3	36.3	1.0	2.7
R1/871	BEDROOM	152.1	146.2	121.6	24.6	16.8
R2/871	BEDROOM	152.5	146.7	146.7	0.0	0.0
R3/871	BEDROOM	153.4	147.5	142.1	5.4	3.7
R4/871	BEDROOM	153.5	147.2	147.2	0.0	0.0
R1/872	BEDROOM	152.1	145.8	117.2	28.6	19.6
R2/872	BEDROOM	152.5	147.2	147.2	0.0	0.0
R3/872	BEDROOM	153.6	147.4	137.2	10.2	6.9
R4/872	BEDROOM	153.5	145.4	145.4	0.0	0.0
R1/873	HABITABLE	168.2	168.2	168.2	0.0	0.0
R2/873	HABITABLE	168.2	168.2	168.2	0.0	0.0
R3/873	HABITABLE	168.2	168.2	168.2	0.0	0.0
R4/873	HABITABLE	168.2	168.2	168.2	0.0	0.0
R1/880	BEDROOM	107.7	43.4	43.4	0.0	0.0
R3/880	BEDROOM	97.1	42.6	42.5	0.1	0.2
R4/880	BEDROOM	88.6	58.7	58.7	0.0	0.0
R5/880	BEDROOM	109.5	69.9	69.2	0.7	1.0
R1/881	BEDROOM	107.7	103.1	103.1	0.0	0.0
R3/881	BEDROOM	149.4	142.7	142.7	0.0	0.0
R4/881	BEDROOM	88.6	82.1	82.1	0.0	0.0
R5/881	BEDROOM	159.1	150.3	150.3	0.0	0.0



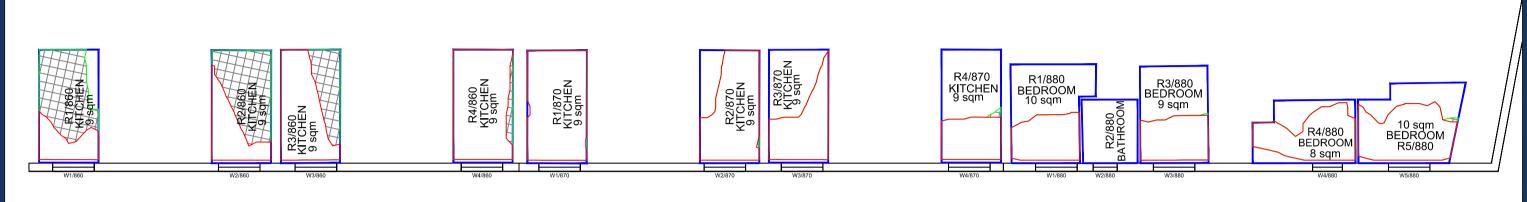
NSL ANALYSIS

ASHER HOUSE, BLACKBURN ROAD
PROPOSED SCHEME
27/05/20
Cumulative Scenario

Option 02 / 14 Blackburn Road

Room	Room Use	Whole Room sq ft	Existing sq ft	Proposed sq ft	Loss sq ft	%Loss				
			NSL							
R1/882	BEDROOM	107.7	103.1	103.1	0.0	0.0				
R3/882	BEDROOM	149.4	142.2	142.2	0.0	0.0				
R4/882	BEDROOM	88.6	81.7	81.7	0.0	0.0				
R5/882	BEDROOM	159.1	150.2	150.0	0.2	0.1				
R1/883	BEDROOM	141.8	140.7	140.2	0.5	0.4				
R2/883	BEDROOM	96.7	96.7	96.7	0.0	0.0				





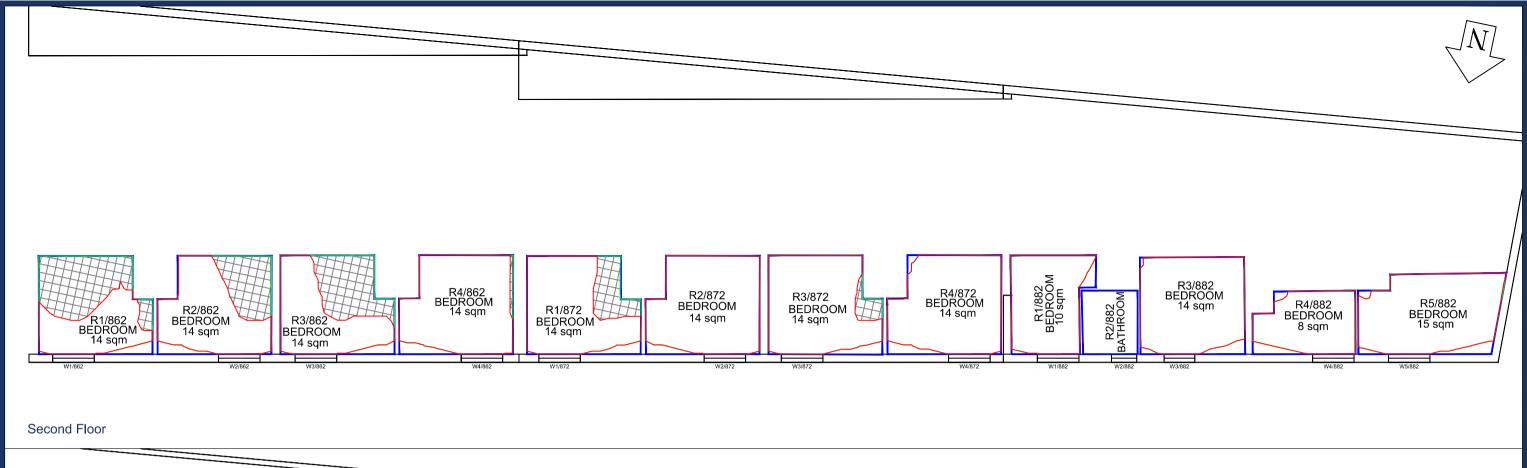
Ground Floor

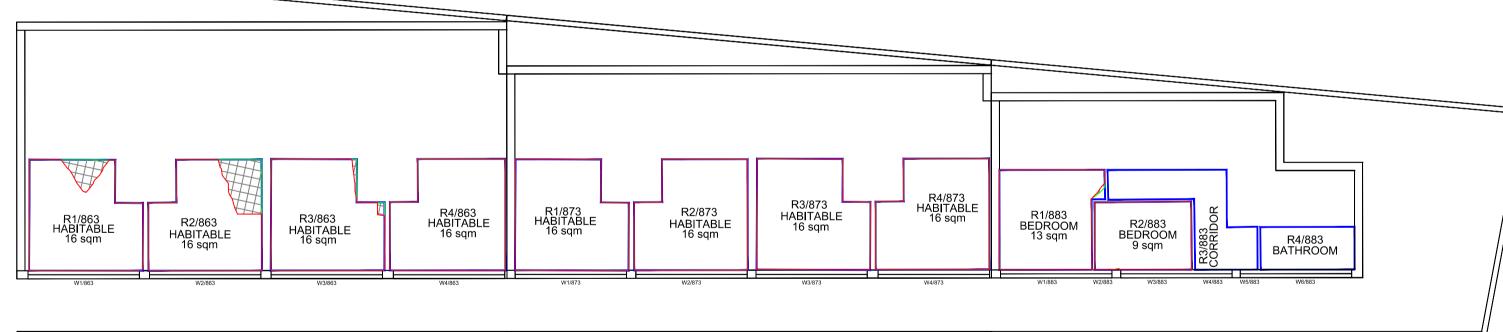


First Floor





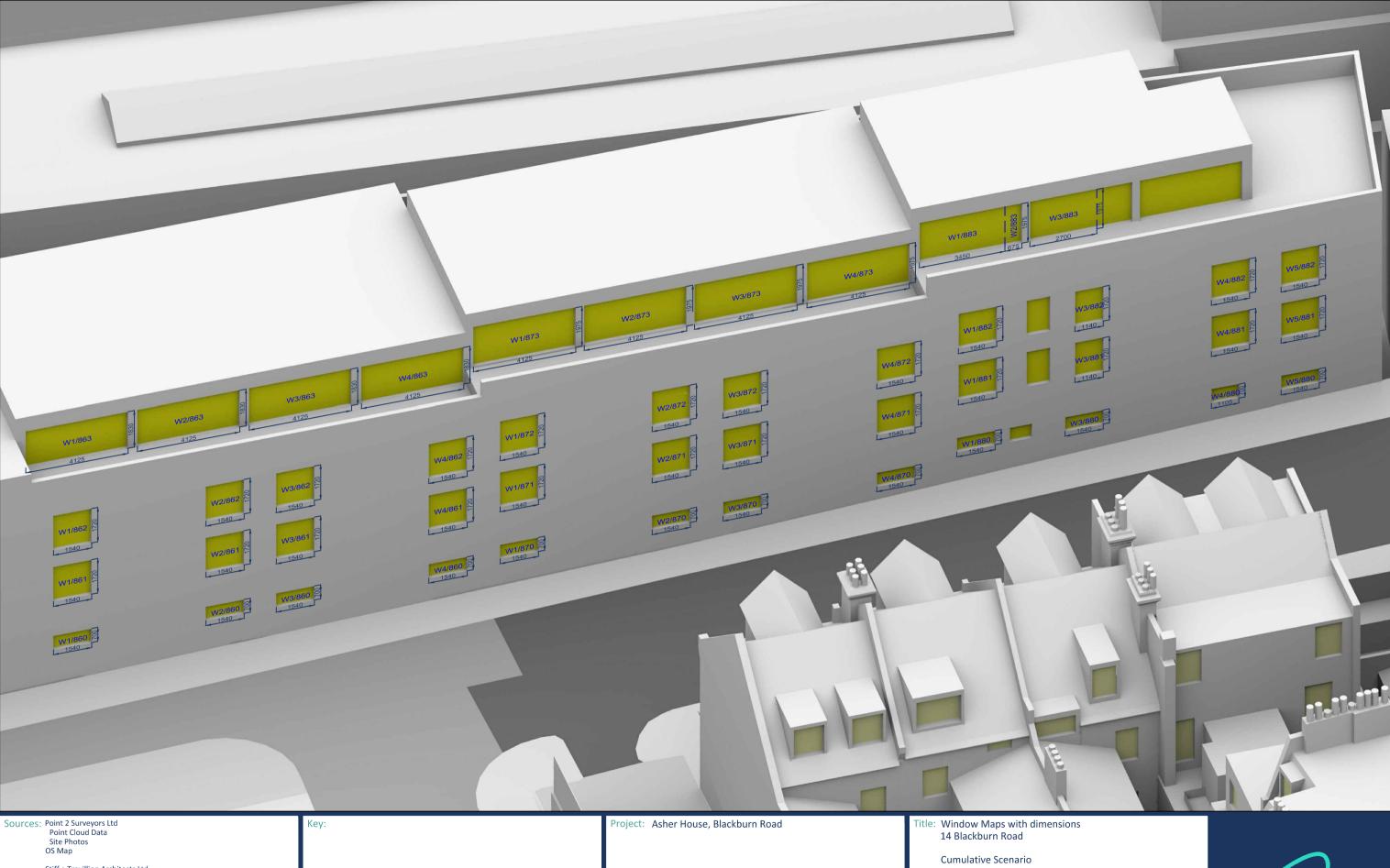




Third Floor







Stiff + Trevillion Architects Ltd Proposed Scheme Received 27/05/20 File Name: 4153-200522-MainModel_2010.dwg Proposed Scheme Received 04/06/20 File Name: 4153-ST-PR-02-(099-109).dwg 4153-ST-PR-03-(100-105).dwg 4153-ST-PR-04-(100-104).dwg

Date:

Drawn By:

PM

Scheme Confirmed:

NTS@A3

Date:

Oct 20

Dwg No:

10



P1382/WM/07A