



**By Email**  
AGargan@geraldeve.com

FAO Jennifer Walsh  
Planning and Building Development  
5 Pancras Square  
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NIC 4AG

Dear Ms Walsh,

**Re: The British Library extension – BRE Guidance update 2022**

We are writing pursuant to the pending applications for planning permission and listed building consent (refs: 2022/1041/P and 2022/1320/L) at the Land to the North of the British Library on behalf of the Applicants.

As you are aware, the BRE Guidance, for which the daylight and sunlight methodologies for this application are predicated against, were updated on 10<sup>th</sup> June 2022 with BRE 209 2022 Edition.

This new guidance supersedes the previous version of the BRE Guidelines and includes a number of key updates and changes to the methodologies set out within.

When considering the Daylight, Sunlight and overshadowing impacts on existing residential surrounding properties, the assessment guidance remains relatively unchanged with only updates relating to the qualification of potential sensitive receptors and the consideration of solar PVs. Having reviewed these aspects alongside the submitted EIA Chapter and associated scoping, we do not believe that any changes would be required due to these changes.

Turning to proposed new developments that contain residential uses, there are changes to how daylight and sunlight is assessed within a scheme, with the main changes focussing on:

- ADF & NSL tests are deleted and replaced by more complex climate influenced median Daylight Factor or Target Illumination (lux) tests (BS EN17037);
- The selection of target levels is better defined and contextual considerations will play a key role in selecting the appropriate levels, which are generally higher than the previous standards;
- Sunlight - The new test is by way of a room receiving 1.5 hours of sunlight on 21st March (replacing old APSH test).

As set out within the scoping documents for this site, the British Library application did not require any internal daylight and sunlight assessments due to it the proposed use class which is solely non-residential.

Therefore, the updated BRE guidelines do not affect the assessments undertaken in the EIA and the conclusions are therefore considered robust in light of the recently published guidance.

I hope the above is clear and we would welcome a discussion with yourself should you wish.

Yours sincerely,  
For and on behalf of GIA



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**DATE / REF**

22/06/2022  
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