17 SLINGSBY PLACE
LONDON | WC2E 9AB

Allen Sacbuker
80-83 Long Acre
London
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21st July 2022

Dear Allen,

RE: 52 TOTTENHAM STREET – NEW BRE GUIDELINES

Further to recent correspondence it is understood that the London Borough of Camden seek to understand the context of the recently published 2022 BRE Guidelines with particular focus on the changes in assessment methodologies and how this may affect the results outlined within the Point 2 report that accompanied the planning application.

The Point 2 daylight and sunlight report (June 2020) considered the potential light changes to neighbouring buildings and separately, the internal daylight availability to the proposed scheme. The assessment methodologies followed the BRE Guidelines (2011) 2nd edition (then current at the time of submission). For reference, the assessment methodologies that were considered within the report are outlined below:

External Daylight Assessment

- Vertical Sky Component (VSC)
- No Sky Line (NSL)

External Sunlight Assessment

- Annual Probable Sunlight Hours (APSH)

Internal Daylight Assessment

- Average Daylight Factor (ADF)

Internal Sunlight Assessment

- Annual Probable Sunlight Hours (APSH)

Since the submission of the 52 Tottenham Street application, the BRE have very recently published and released an updated document, the BRE Guidelines (2022) 3rd edition, superseding the 2nd edition. In terms of the assessments outlined within the guidelines for external assessments, ie methodologies undertaken to consider neighbouring buildings, these remain consistent with the superseded 2011 BRE Guidelines and therefore there is no change.

The primary changes relate to the internal daylight and sunlight assessments. The 2022 BRE Guidelines has evolved from the internal daylight ADF methodology to a new climate-based assessment, the Climate Based Daylight Modelling (CBDM). The CBDM assessment is more complex in nature when compared to the superseded ADF assessment and involves calculating the daylight levels for each daylight hour on every day of the year, moving away from the application of the consistent overcast sky input as per the 2011 BRE Guidelines. The results are then displayed as a median lux level for the isolated room and assessed against the new BRE recommended daylight targets. The affect of the CBDM assessment on the current scheme will likely record more realistic daylight results, particularly to northern orientated rooms.

In respect of the internal sunlighting assessment, the APSH methodology has been superseded by a test that requires a minimum of 1.5 hours of sunlight on March 21st. The adoption of the latest internal sunlight assessment will likely see more rooms with an orientation 90 degrees of due south meet the recommended target values.

I hope the above is helpful.

Elliot Smith
Senior Surveyor
Point 2 Surveyors