17 SLINGSBY PLACE
LONDON | WC2E 9AB

Allen Sacbuker
80-83 Long Lane
London
EC1A 9ET

4th August 2022

Dear Allen,

RE: 52 TOTTENHAM STREET – INTERNAL DAYLIGHT AND SUNLIGHT

By way of background, Point 2 are industry award winning daylight and sunlight experts, with market I write to you in relation to 52 Tottenham Street and the recent publication of the 2022 BRE Guidelines. As discussed, the BRE Guidelines have recently published an updated document that supersedes the 2011 BRE Guidelines. The latest publication (2022) outlines the appropriate assessment methodologies to consider daylight and sunlight to neighbouring buildings and separately to the proposed accommodation.

In short, the recommended methodologies to assess skylight to neighbouring buildings are consistent with those outlined within the 2011 BRE Guidelines. The methodology changes relate to the assessment of the proposed accommodation (internal daylight & sunlight). The 2022 BRE Guidelines has adopted the new Climate Based Daylight Modelling (CBDM) methodology and supersedes the 2011 BRE Guideline's Average Daylight Factor (ADF) methodology, comprising complex inputs to reflect a more realistic assessment of retained daylight (when compared to the ADF methodology). The 2022 BRE Guidelines further adopt an updated internal sunlight assessment, whereby the assessed room is required to receive at least 1.5 hours of sunlight on a specific date of the year, superseding the 2011 BRE Guidelines internal Annual Probable Sunlight Hours (APSH) methodology. Further to correspondence with the local planning authority, it is understood that whilst the planning application (planning ref: 2020/3043/P) and subsequent June 2020 Point 2 daylight and sunlight report ("The June 2020 Report") (assessed by reference to the then current 2011 BRE Guidelines) has been validated, there has been a request for the Point 2 daylight and sunlight to be updated to reflect the latest 2022 BRE Guidelines.

As aforementioned, it is considered prudent to provide an update to the internal analysis in isolation, as the BRE assessments that consider the neighbouring buildings remain unchanged and consistent with those undertaken within The June 2020 Report.

Internal Daylight & Sunlight Results

The June 2020 Report that accompanied the submitted application adopted the Average Daylight Factor (ADF) methodology and adhered to the recommended assessment outlined within the 2011 BRE Guidelines, the then current publication. The results of the ADF methodology demonstrated full BRE compliance (100%), recording all 10 assessed rooms meeting or exceeding their room classification target values (by reference to the BRE's ADF room target values).

As per the request, the analysis has been updated to reflect the CBDM methodology. Similar to the superseded ADF methodology, the BRE outlines specific room use target values for the CBDM methodology. These are as follows:

Bedroom – Median of 100 Lux
Living room – Median of 150 Lux
Kitchen – Median of 200 Lux

The updated CBDM technical analysis has been applied to the same 10 habitable rooms, consistent with those assessed within The June 2020 Report. The results show that 9 out of 10 assessed rooms (90%) will meet their room specific target values (full results shown within Appendix 1). The isolated room that does not meet their room classification target value is a bedroom and records a median lux level of 65.5, falling short of the suggested 100 lux level. However, it should be noted that this room type is a bedroom and is recognised by the BRE Guidelines to have less expectation for natural light when compared to a living room, by virtue of its functionality. Separately, it should also be considered that the design input in respect of internal daylight was assembled in line with the 2011 BRE Guidelines, for which achieves full BRE compliance. The future amendments of the assessment methodology cannot be predicted.

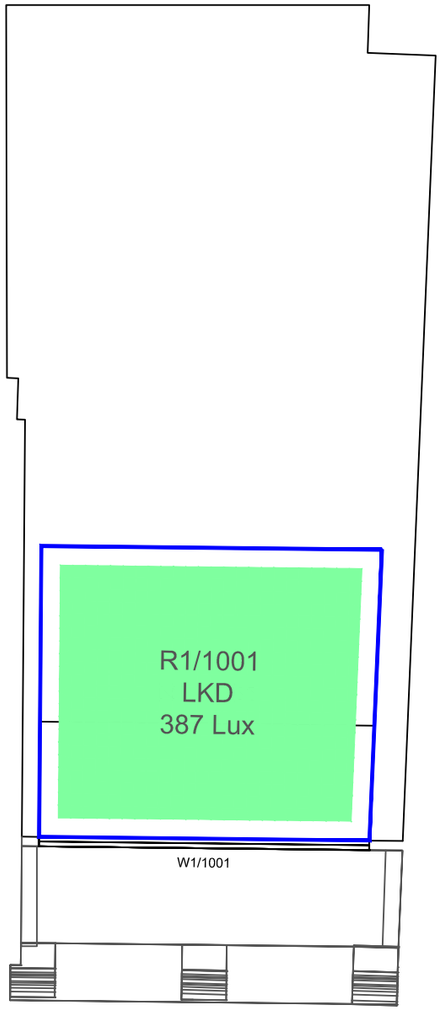
In respect of the internal sunlight, the 2011 BRE Guidelines recommended the internal Annual Probable Sunlight Hours (APSH) methodology is adopted. The June 2020 Report recorded 60% compliance across those assessed rooms. The results of the updated 2022 recommended internal sunlight methodology records full BRE compliance (100%). All 10 rooms record at least 1.5 hours of sunlight on day during the year. The results can be found within Appendix 2.

In summary, the results of the updated internal analysis (by reference to the 2022 BRE Guidelines) continue to fall within the practical application of the BRE Guidelines and demonstrate very good retained skylight considered more than acceptable for the proposed accommodation.

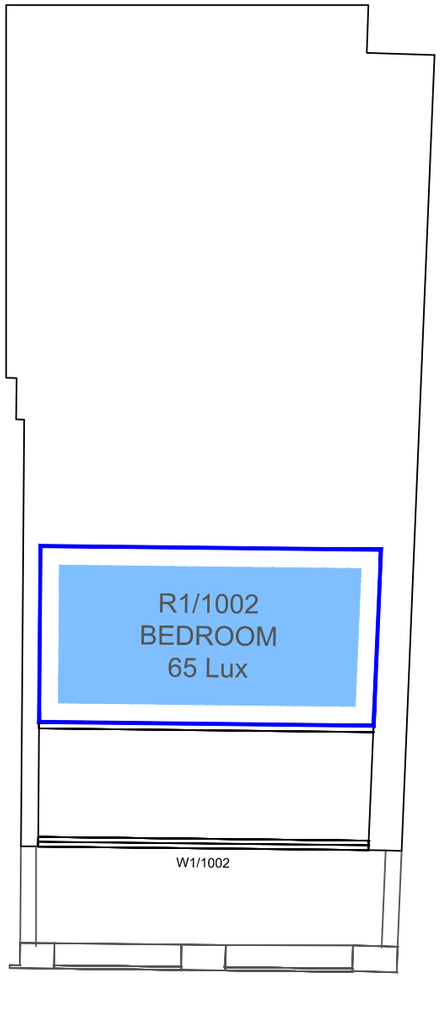
Kind Regards

Elliot Smith
Senior Surveyor
Point 2 Surveyors

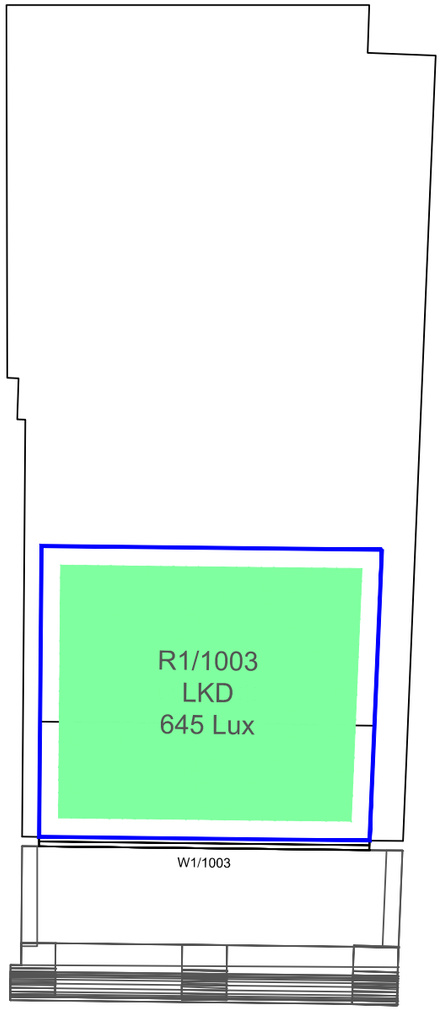
Appendix 1: Internal Daylight (CBDM) Results



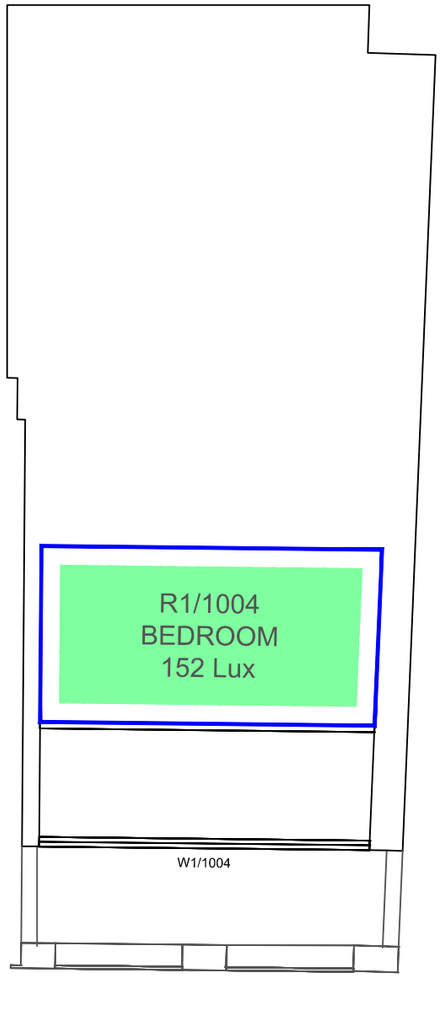
First Floor



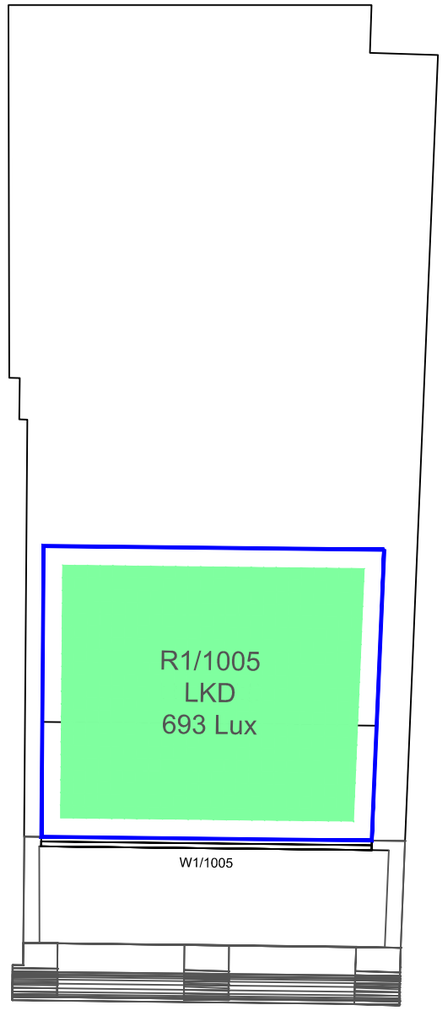
Second Floor



Third Floor



Fourth Floor



Fifth Floor

Sources: LASER SURVEYS
Partial Site Survey

DSDHA ARCHITECTS
2D and 3D Information (received 26/06/20)
297_200626_52TottenhamStreet_3D Model.dwg
297_P20-100 - GA Plan - Level (B1-10).dwg
297_P20-105 - GA Roof Plan.dwg
297_P40-100 - GA Sections - AA & BB.dwg

Key: Daylight Illuminance

Area analysed

Area exceeds target Illuminance (Lux) for more than 50% of Daylight Hours

Median Illuminance (Lux) Levels shown for each room.

Recommended Targets:

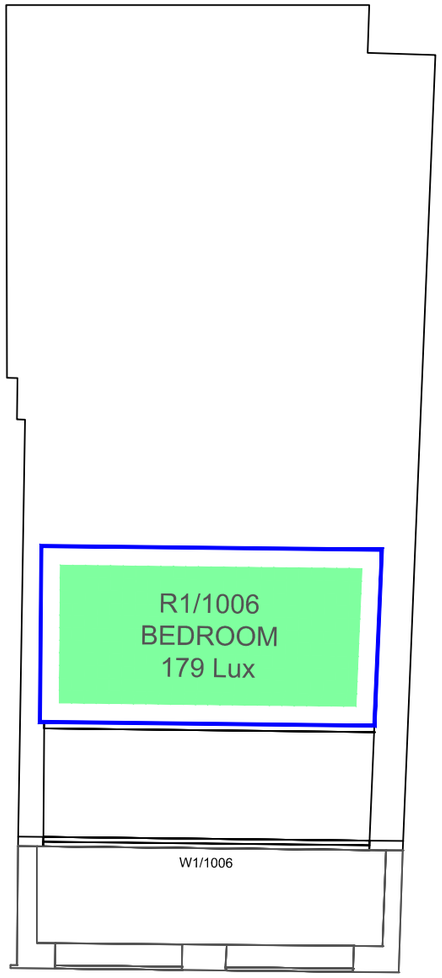
Bedroom	100 Lux
Living Room	150 Lux
Kitchen	200 Lux

Project: 52 Tottenham Street
London

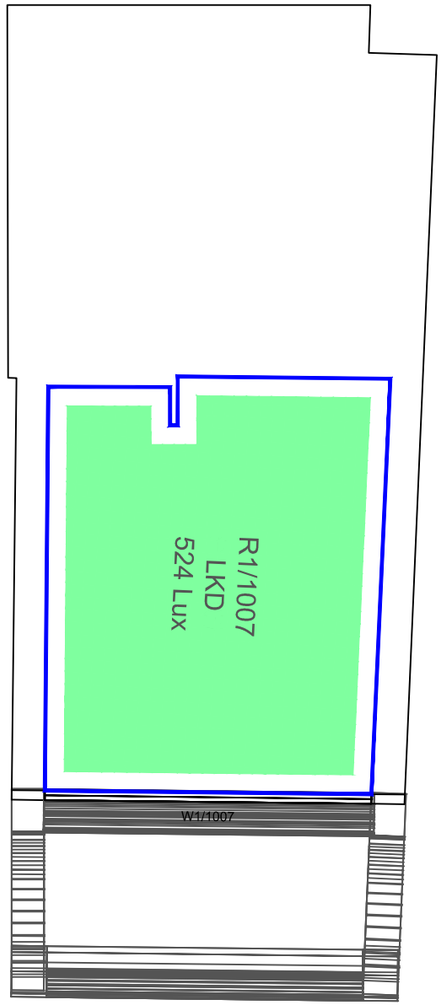
Title: Climate Based Daylight Modeling (CBDM) Assessment
Median Luminance (Lux) Levels

Proposed Scheme Dated 25/02/20

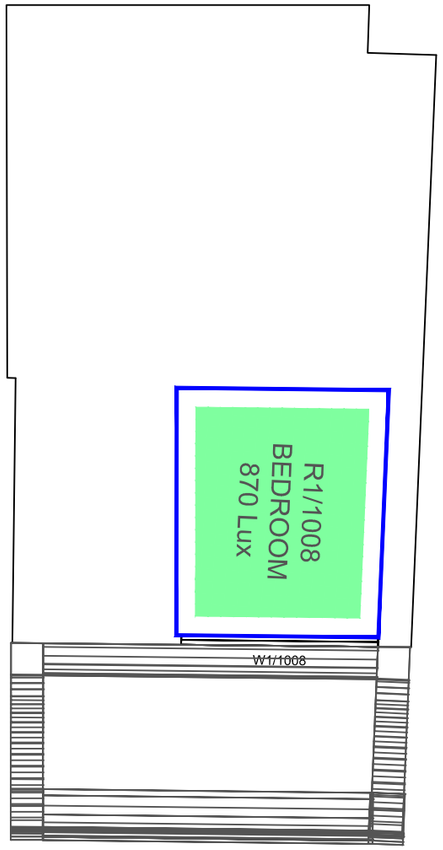
Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
DSDHA ARCHITECTS	-	JR	1:100@A3	Aug 22	P1704/TRGT/01	15



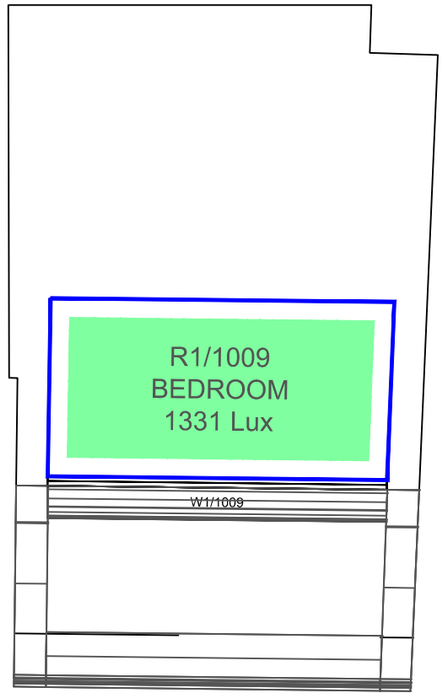
Sixth Floor



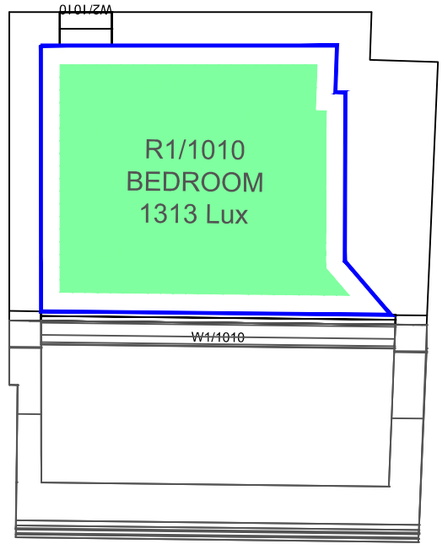
Seventh Floor



Eighth Floor



Ninth Floor



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Appendix 2: Internal Sunlight Results

CBDM ANALYSIS

52 TOTTENHAM STREET, LONDON

PROPOSED SCHEME DATED 25.02.20

Room	Room Use	Date	Sunlight Exposure (Hours)
Proposed Scheme Dated 25.02.22			
R1/1001	LKD	21-Mar	3.1
R1/1002	BEDROOM	01-Feb	1.7
R1/1003	LKD	21-Mar	4.8
R1/1004	BEDROOM	03-Feb	2.7
R1/1005	LKD	12-Mar	5.0
R1/1006	BEDROOM	09-Feb	2.7
R1/1007	LKD	13-Mar	7.7
R1/1008	BEDROOM	05-Mar	7.5
R1/1009	BEDROOM	19-Mar	7.8
R1/1010	BEDROOM	21-Mar	8.0