

Jacob Loftus
General Projects
55 Blandford St
London
W1U 7HW



17 SLINGSBY PLACE
LONDON | WC2E 9AB

(Our Ref: 1382)

28th September 2022

Dear Jacob,

RE: THE REDEVELOPMENT OF ASHER HOUSE, 13 BLACKBURN ROAD, LONDON NW6 1AW – DAYLIGHT AND SUNLIGHT MATTERS

This letter provides a summary of our most recent technical analysis, which considers the daylight amenity within i) the proposed accommodation at Asher House, 13 Blackburn Road and ii) the adjacent consented scheme at 11 Blackburn Road (but with balconies removed and rooms curtailed at 4m deep) in accordance with the recent publication of the 2022 BRE Guidelines. It should be read in conjunction with our previous Daylight and Sunlight report dated June 2020 (The 'June 2020 Report').

As you know, the BRE Guidelines have recently published an updated document that supersedes the 2011 BRE Guidelines. The latest 2022 publication outlines the new appropriate assessment methodologies to consider daylight and sunlight within neighbouring buildings and separately within any proposed habitable accommodation. In short, the recommended methodologies to assess skylight to neighbouring buildings are largely consistent with those outlined within the 2011 BRE Guidelines. The changes relate predominantly to the assessment of daylight and sunlight within any proposed habitable accommodation, which now necessitates a Climate Based Daylight Modelling (CBDM) approach.

The new CBDM methodology is based on the British Standard 'Daylight in Buildings' (BS EN17037). This contains advice and guidance on interior daylighting for all buildings across Europe but also has a UK National Annex which provides suggested targets for dwellings in the UK. It supersedes the 2011 BRE Guideline's Average Daylight Factor (ADF) methodology, comprising complex inputs to reflect an arguably more realistic assessment of retained daylight. CBDM gives new minimum target values for each habitable room use, which are generally harder to meet than the previous ADF test, but which are advisory only and flexibility in their application is still encouraged. The new target values are:

- Bedroom – 100 median lux
- Living room – 150 median lux
- Kitchen – 200 median lux

A room is said to meet guidance where the target illuminance (median lux level, as above) is achieved across at least half of the room area assessed, for at least half of the daylight hours in a year. However, where a scheme has been in development for some time prior to the introduction of these new guidelines, it would be unreasonable to expect it to meet full compliance given that the design input has been undertaken in line with the previous 2011 Guidelines.

It is understood that whilst a planning application (planning ref: 2020/2940/P) for the site has already been submitted to the Local Authority for consideration, there has been a request for the Point 2 assessments which formed part of this application, and which formed the basis of the June 2020 Report, to be updated to reflect the latest 2022 BRE Guidelines. It is only considered prudent to provide an update to our internal daylight analysis (within the proposed scheme itself) in this respect, as this was the only previous assessment based on the now outdated ADF methodology.

It is understood that the Local Authority also wishes to better understand how the proposal will affect daylight availability at the neighbouring 11 Blackburn Road site. To this end we have undertaken an assessment of this site in accordance with the new CBDM methodology, to demonstrate what levels of daylight could be achievable following construction of the 13 Blackburn Road scheme.

An overview of each is detailed below.

Internal Daylight Results

Our previous daylight analysis of the proposed accommodation at 13 Blackburn Road demonstrated widespread BRE compliance, with 97 of the total 104 assessed rooms (93.3%) meeting or exceeding their room classification target values (by reference to the 2011 BRE guide's ADF room target values and adopting a target value of 1.5% for multi-use Living Kitchen Dining rooms (LKDs)).

The updated CBDM (Daylight Illuminance) technical analysis has been applied to the same 104 proposed habitable rooms and thus is consistent with those reported upon within the June 2020 Report. The results show that a new total of 93 rooms (89.4%) will meet their room specific target values. Please find a full set of results within the data spreadsheet and drawings P1382/CBDM/01-03, located in Appendix 1.

Where there is a multi-use room such as an LKD, a similar approach has been taken as that in the June 2022 Report. Because the kitchen element is a small, 'non-habitable' space, located to the rear of an open plan room where there is no realistic expectation for daylight, then the lower target of a living room (150 median lux) has been applied, in accordance with up-to-date guidelines. For clarity, the kitchen has been included in the assessed room area, albeit the room has been tested against the lower target.

The difference between the two compliance rates is minor in our view, and all 11 rooms that fail to meet guidance are oriented north where there is a lower expectation for good daylighting compared to a south-facing room. Separately, it should also be considered that the design input in respect of internal daylight was undertaken in line with the 2011 BRE Guidelines, which achieves over 90% BRE compliance.

In summary, we believe the results of the updated internal analysis continue to fall within the practical application of the updated BRE Guidelines and demonstrate good levels of retained skylight.

11 Blackburn Road Daylight Results

Turning now to the neighbouring site at 11 Blackburn Road, this is located to the immediate North West of 13 Blackburn Road and is currently occupied for industrial usage. It benefits from a historic planning consent dated 05.05.17, for redevelopment and conversion to residential usage, however this is now understood to have lapsed.

Usually in such circumstances where there is no existing habitable residential accommodation and no valid planning consent for conversion of usage, and in accordance with both old and new guidelines, the neighbouring land would not require consideration from a daylight and sunlight perspective. Nonetheless, in order to check that construction of the 13 Blackburn Road scheme will not restrict reasonable redevelopment of this site in the future, we have undertaken an assessment of the 2017 consented scheme with it in situation and in accordance with the new CBDM (Daylight Illuminance) methodology.

In undertaking our analysis in this respect, we have stripped out the neighbouring scheme's balconies and curtailed the rooms within to 4m deep. This is because i) the consent has lapsed and the scheme is now unlikely to be built, hence this is a hypothetical situation only, and ii) the BRE Guide advises that rooms which are served by windows located underneath balconies and/or which are excessively deep will, by merit of their own design, struggle to receive adequate levels of natural light. This advice has been carried forward from the previous guidelines and hence is a widely recognised and accepted concept.

On page 13 of the document, it states:

"Even on a totally unobstructed site a very deep room cannot be properly daylit."

And goes on to add:

"A room that is heavily obstructed by its own design and reliant on daylight over low-rise neighbouring buildings may lose most of its light in the event of future changes to those buildings."

Drawings P1382/CBDM/04 and the corresponding spreadsheet located in Appendix 2 detail the results of this analysis. As you will be able to see, of the total 18 rooms included for assessment, all except 3 ground floor kitchens (83.3%) comfortably exceed guidance. We would consider this to be a good level of overall compliance in respect of the Central London location and the recommended flexibility of application. Additionally, the median lux level for the 3 aforementioned kitchens exceeds 150 lux, which is not at all unreasonable in consideration of the fact that they are located at ground floor level. Further, if they were converted into another usage, such as a living room or bedroom, then they would meet the recommended target value, or alternatively if the ground floor was used for non-habitable purposes such as a reception area or retail units/offices, then the scheme would be fully BRE compliant with regards to Daylight Illuminance criteria.

Overall, the analysis demonstrates that it is certainly possible to design a viable scheme for the site which would achieve a high level of compliance against the updated BRE Guidelines.

Hopefully the above summary is clear but please do let me know if you'd like to discuss further.

Kind Regards



Georgina Mann
Associate Director
For and on behalf of Point 2 Surveyors

Appendix 1



BRE CBDM ANALYSIS

Asher House, Blackburn Road, London
Proposed Scheme dated 27/05/20
Internal Analysis

Room Label	Room Use	Room Use Target Illuminance Lux	Median Illuminance Lux	Fraction of Working Plane % Area	BRE ADF(%)
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Asher House, Blackburn Road

R1/801	LKD	200	68	13.8	1
R2/801	BEDROOM	100	196.3	75.5	2.3
R3/801	BEDROOM	100	215.7	98.9	2.3
R4/801	STUDIO	200	465	95	3.9
R5/801	STUDIO	200	188.6	44.9	1.8
R6/801	STUDIO	200	421.6	98.6	3.5
R7/801	STUDIO	200	68.7	13.7	1.3
R8/801	LKD	200	39.9	0	0.3
R9/801	BEDROOM	100	214.9	99.4	2.7
R10/801	BEDROOM	100	387.6	100	3.8
R11/801	BEDROOM	100	220.8	100	2.5
R12/801	LKD	200	157	35.9	1.7
R13/801	BEDROOM	100	134.3	72.2	1.9
R14/801	LKD	200	171.7	37.8	2
R15/801	LKD	200	544.1	99.1	3.5
R16/801	BEDROOM	100	134.2	84.6	1.2
R17/801	LKD	200	496.9	98.6	3.4
R18/801	BEDROOM	100	165.1	83.2	2
R19/801	STUDIO	200	264.1	60.5	3
R20/801	BEDROOM	100	132.7	77.5	1.7
R1/802	LKD	200	115.5	24.8	1.4
R2/802	BEDROOM	100	289.8	98.7	2.6
R3/802	BEDROOM	100	331.5	100	2.7
R4/802	STUDIO	200	622.3	100	4.4
R5/802	STUDIO	200	203.9	51.8	1.8
R6/802	STUDIO	200	466.2	100	3.8
R7/802	STUDIO	200	81.4	19.4	1.5
R8/802	LKD	200	50.8	2.1	0.4
R9/802	BEDROOM	100	252.5	100	2.8
R10/802	BEDROOM	100	440.4	100	4
R11/802	BEDROOM	100	259.7	100	2.7
R12/802	LKD	200	188.3	46.5	1.9
R13/802	BEDROOM	100	170.1	85.3	2.2
R14/802	LKD	200	194.6	47.5	2.3
R15/802	LKD	200	588.4	99.5	3.7
R16/802	BEDROOM	100	151	89.4	1.3



BRE CBDM ANALYSIS

Asher House, Blackburn Road, London
Proposed Scheme dated 27/05/20
Internal Analysis

Room Label	Room Use	Room Use Target Illuminance Lux	Median Illuminance Lux	Fraction of Working Plane % Area	BRE ADF(%)
R17/802	LKD	200	557.7	99.4	3.6
R18/802	BEDROOM	100	222	88.4	2.3
R19/802	STUDIO	200	321.4	77.2	3.3
R20/802	BEDROOM	100	145.7	83	1.8
R1/803	LKD	200	163.6	35.6	1.6
R2/803	BEDROOM	100	357.5	100	2.8
R3/803	BEDROOM	100	402	100	3
R4/803	STUDIO	200	725.8	100	4.6
R5/803	STUDIO	200	218.5	59.3	1.9
R6/803	STUDIO	200	505.4	100	4.1
R7/803	STUDIO	200	97.8	26.7	1.8
R8/803	LKD	200	67.2	7.7	0.7
R9/803	BEDROOM	100	274.2	100	2.9
R10/803	BEDROOM	100	473.7	100	4.2
R11/803	BEDROOM	100	280.9	100	2.8
R12/803	LKD	200	233.1	59.7	2.1
R13/803	BEDROOM	100	250	100	2.4
R14/803	LKD	200	258.2	65.6	2.6
R15/803	LKD	200	655.8	100	3.8
R16/803	BEDROOM	100	158.5	91.2	1.3
R17/803	LKD	200	657.5	100	3.8
R18/803	BEDROOM	100	306.5	97.7	2.6
R19/803	STUDIO	200	393.6	93.8	3.7
R20/803	BEDROOM	100	169.3	90.9	2
R1/804	LKD	200	208	56	1.8
R2/804	BEDROOM	100	400.7	100	3
R3/804	BEDROOM	100	444.2	100	3.1
R4/804	STUDIO	200	782.3	100	4.8
R5/804	STUDIO	200	229.3	67.1	1.9
R6/804	STUDIO	200	563.9	100	4.3
R7/804	STUDIO	200	136.7	36.6	2
R8/804	LKD	200	89.8	15.2	0.8
R9/804	BEDROOM	100	291.5	100	3
R10/804	BEDROOM	100	500.4	100	4.3
R11/804	BEDROOM	100	297.5	100	2.8
R12/804	LKD	200	311.2	76.5	2.6
R13/804	BEDROOM	100	329	100	2.8
R14/804	LKD	200	342.8	78.8	2.9
R15/804	LKD	200	813.5	100	3.9



BRE CBDM ANALYSIS

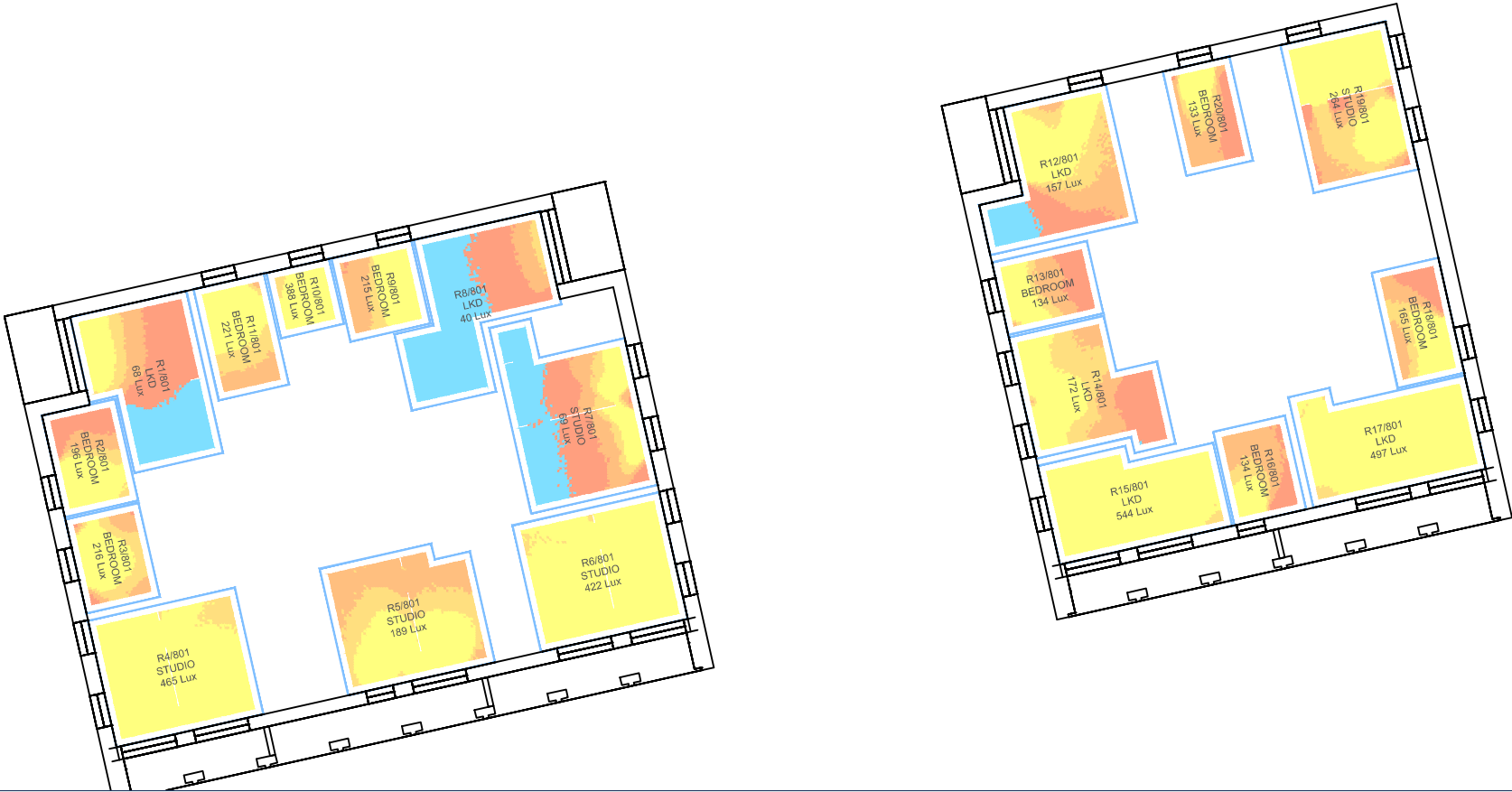
Asher House, Blackburn Road, London

Proposed Scheme dated 27/05/20

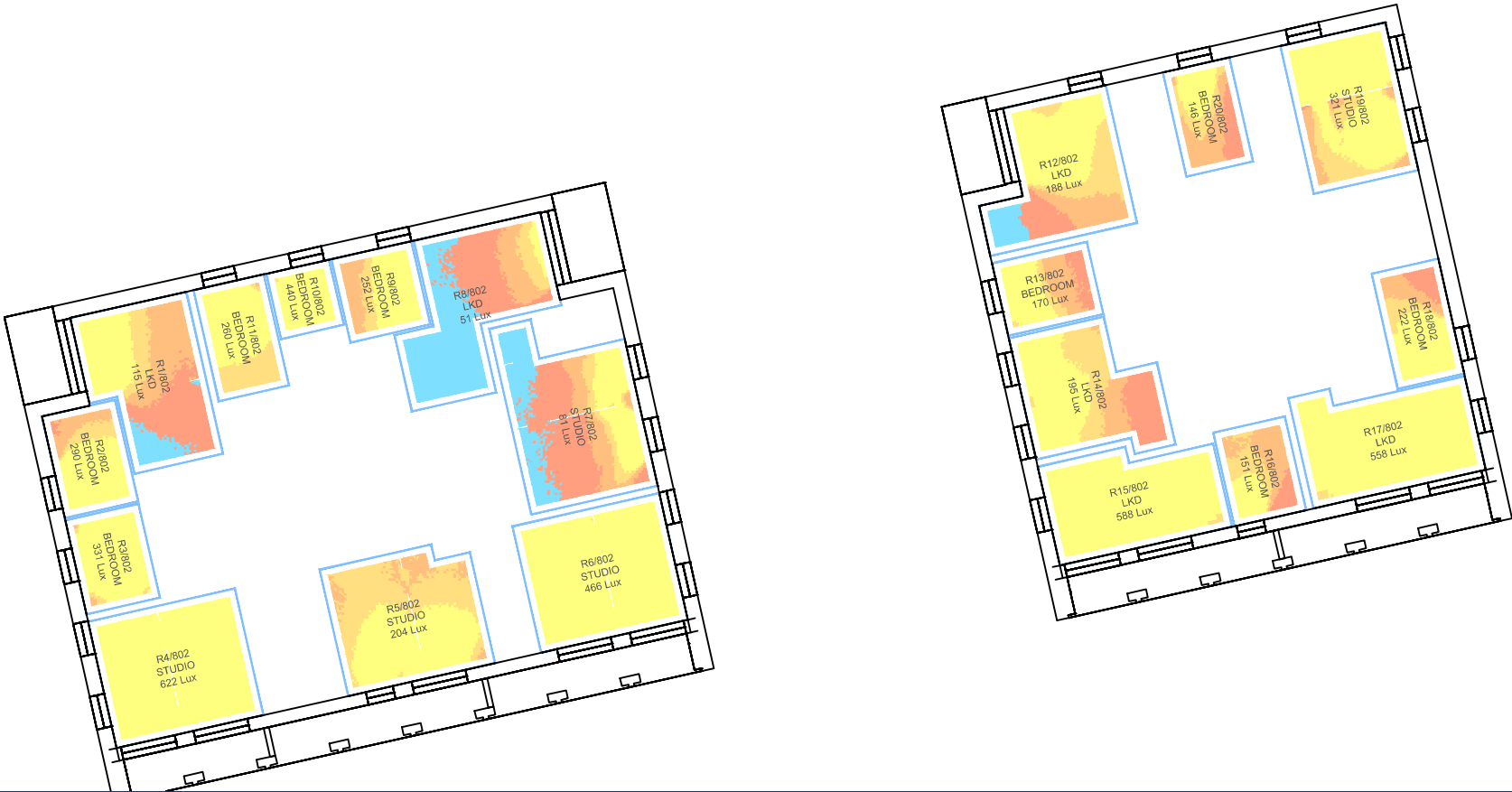
Internal Analysis

Room Label	Room Use	Room Use Target Illuminance Lux	Median Illuminance Lux	Fraction of Working Plane % Area	BRE ADF(%)
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R17/804	LKD	200	723	100	3.9
R18/804	BEDROOM	100	368.1	100	2.9
R19/804	STUDIO	200	469.4	99.5	4.1
R20/804	BEDROOM	100	202.7	99	2.2
R1/805	BEDROOM	100	774.7	100	6.1
R2/805	BEDROOM	100	305.4	100	2.5
R3/805	BEDROOM	100	577.1	100	3.5
R4/805	LKD	200	1136.9	100	5.3
R5/805	LKD	200	923.1	99.4	5
R6/805	BEDROOM	100	382	100	2.9
R7/805	BEDROOM	100	227.4	97.9	2.2
R8/805	BEDROOM	100	461.8	100	4.6
R9/805	LKD	200	379.4	82.8	3
R10/805	BEDROOM	100	404.8	100	3.1
R11/805	LKD	200	425.7	93.3	3.2
R12/805	LKD	200	903	100	4.1
R13/805	BEDROOM	100	166.9	92.6	1.4
R14/805	LKD	200	743.3	100	3.9
R15/805	BEDROOM	100	383.9	100	2.9
R16/805	STUDIO	200	521.6	99.7	4.5
R17/805	BEDROOM	100	237.8	100	2.4
R1/806	BEDROOM	100	303.1	98.3	2
R2/806	BEDROOM	100	292.5	100	2.3
R3/806	BEDROOM	100	1451.5	100	6.2
R4/806	LKD	200	1329.6	100	6.9
R5/806	BEDROOM	100	286.7	100	2.5
R6/806	BEDROOM	100	269	99.5	2.1
R7/806	LKD	200	507.8	99	4.2

1st Floor



2nd Floor



Sources: Point 2 Surveyors Ltd
Point Cloud Data
Site Photos
OS Map

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

Key: Daylight Illuminance
(achieved for 50% over daylight hours)

<50 Lux
>50 Lux
>100 Lux
>150 Lux
>200 Lux

↑ N

Scheme Confirmed: -

Date: -

Project: Asher House, Blackburn Road

Drawn By: EVJ/SA/MG

Scale: 1:275@A3

Date: SEP 22

Title: Climate Based Daylight Modelling (CBDM) Assessment
Median Illuminance (Lux) Levels

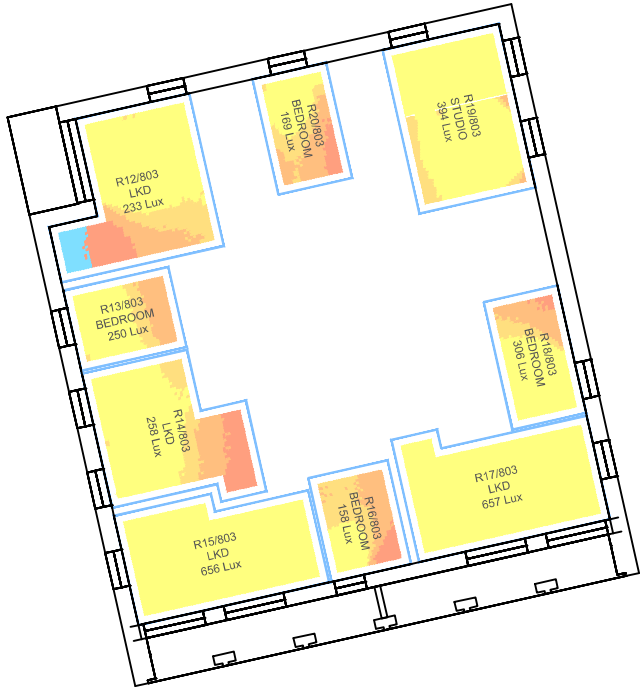
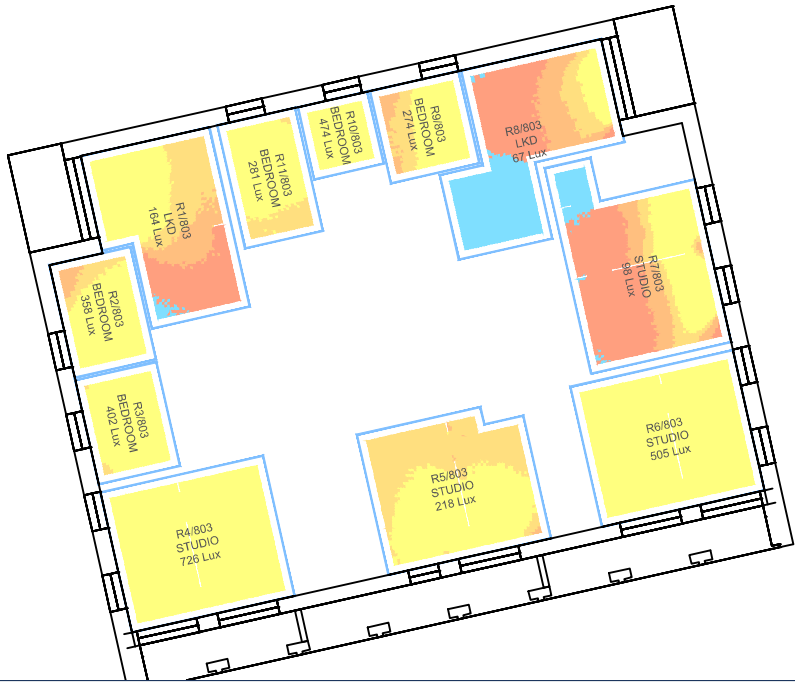
Proposed Scheme 27/05/20

Dwg No: P1382/CBDM/01

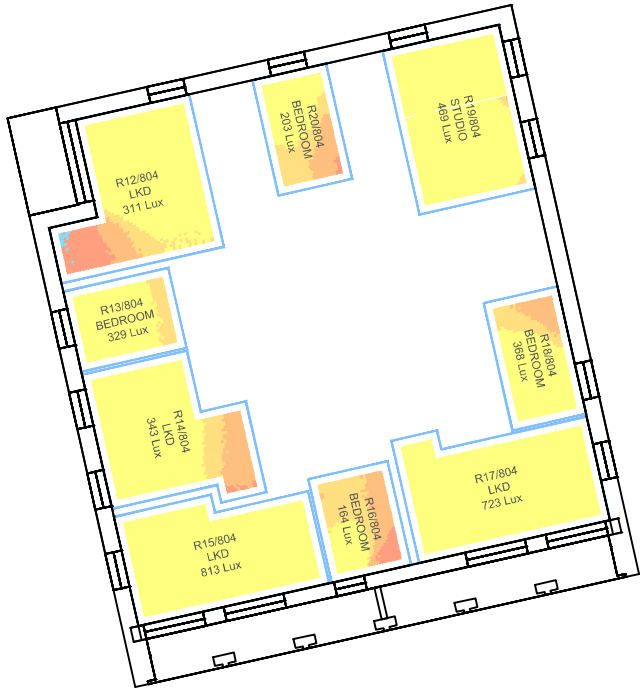
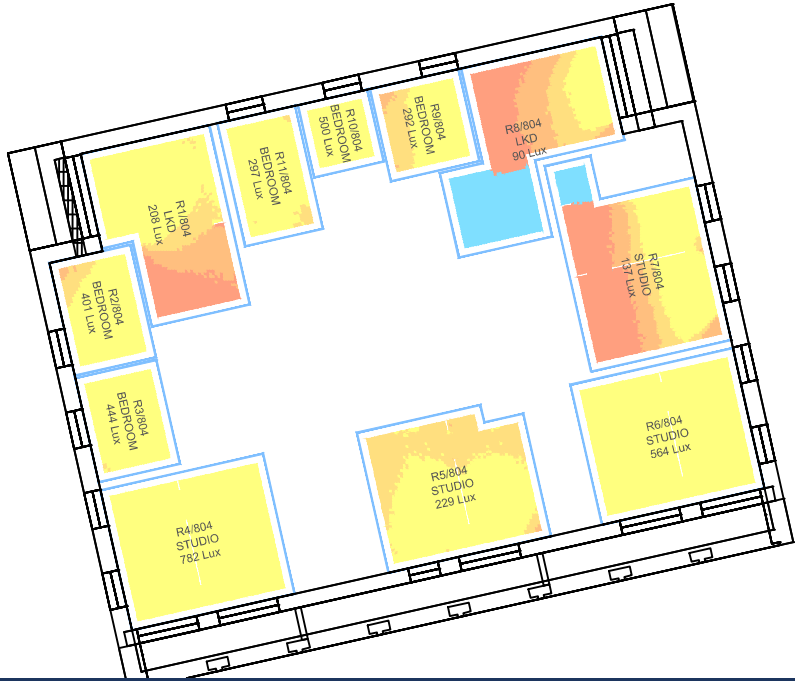
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3rd Floor



4th Floor



Sources: Point 2 Surveyors Ltd
Point Cloud Data
Site Photos
OS Map

Stiff + Trevillion Architects Ltd

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4153-ST-PR-03-(100-105).dwg
4153-ST-PR-04-(100-104).dwg

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(achieved for 50% over daylight hours)

<50 Lux

>50 Lux

>100 Lux

>150 Lux

>200 Lux

Scheme Confirmed:

Date:

Project: Asher House, Blackburn Road

Drawn By:
EVJ/SA/MG

Scale:
1:275@A3

Date:
SEP 22

Title: Climate Based Daylight Modelling (CBDM) Assessment
Median Illuminance (Lux) Levels

Proposed Scheme 27/05/20

Dwg No:
P1382/CBDM/02

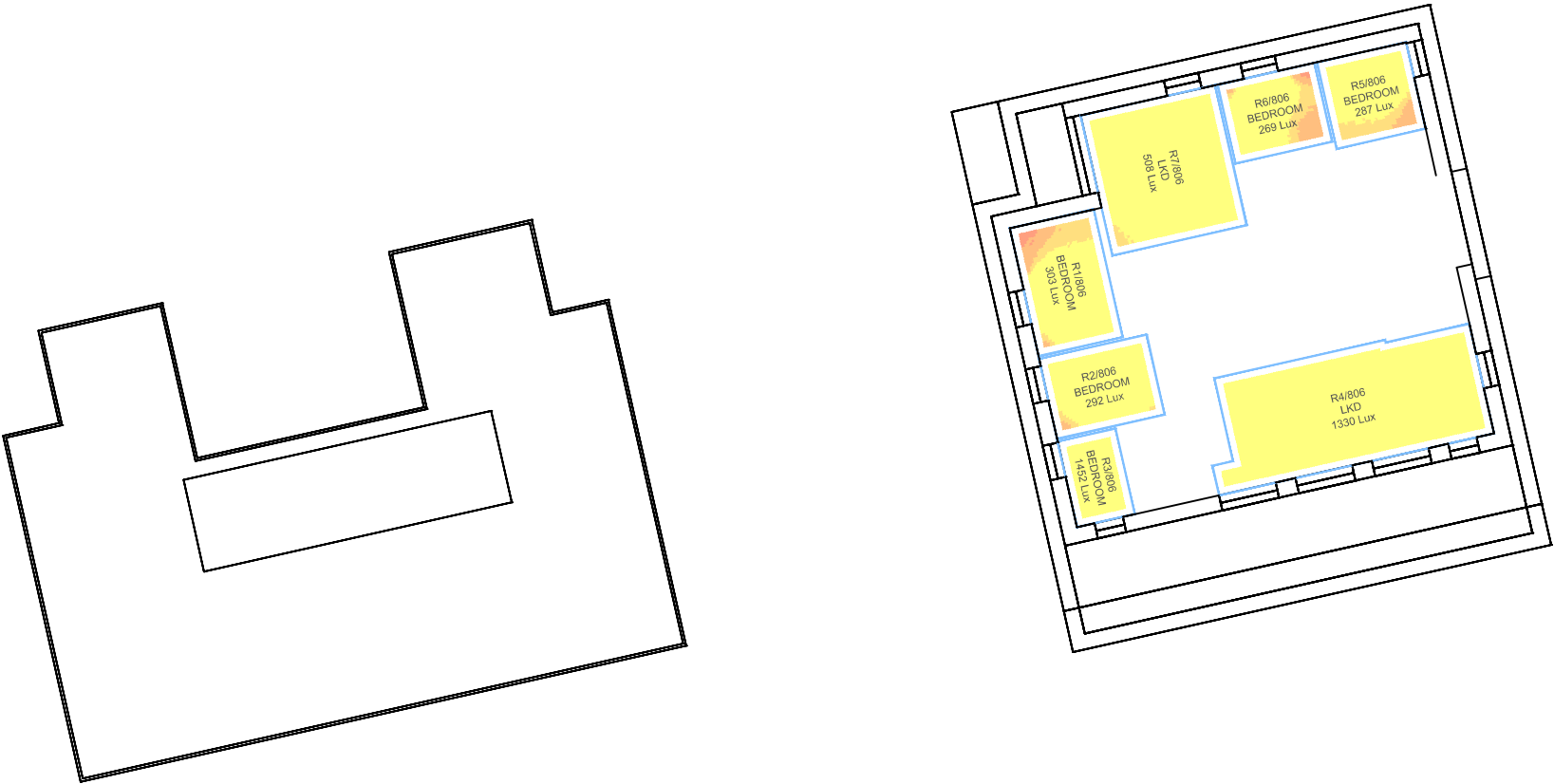
Rel:
12



5th Floor



6th Floor



Sources: Point 2 Surveyors Ltd
Point Cloud Data
Site Photos
OS Map

Stiff + Trevillion Architects Ltd

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Proposed Scheme Received 04/06/20
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4153-ST-PR-03-(100-105).dwg
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>150 Lux

>200 Lux

Scheme Confirmed:

Date:

Project: Asher House, Blackburn Road

Drawn By:
EVJ/SA/MG

Scale:
1:275@A3

Date:
SEP 22

Title: Climate Based Daylight Modelling (CBDM) Assessment
Median Illuminance (Lux) Levels

Proposed Scheme 27/05/20

Dwg No:
P1382/CBDM/03

Rel:
12



Appendix 2



BRE CBDM ANALYSIS

Asher House, Blackburn Road, London

Proposed Scheme dated 27/05/20

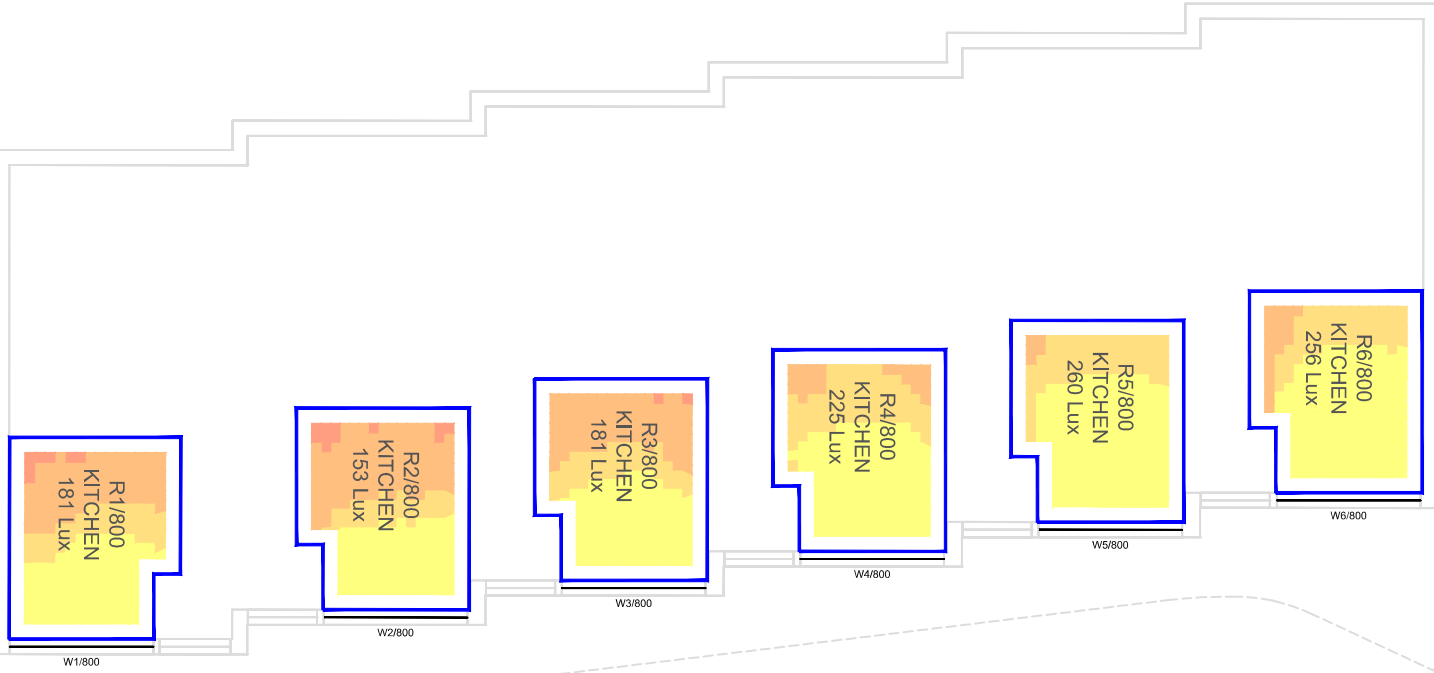
11 Blackburn Road

Balconies Removed

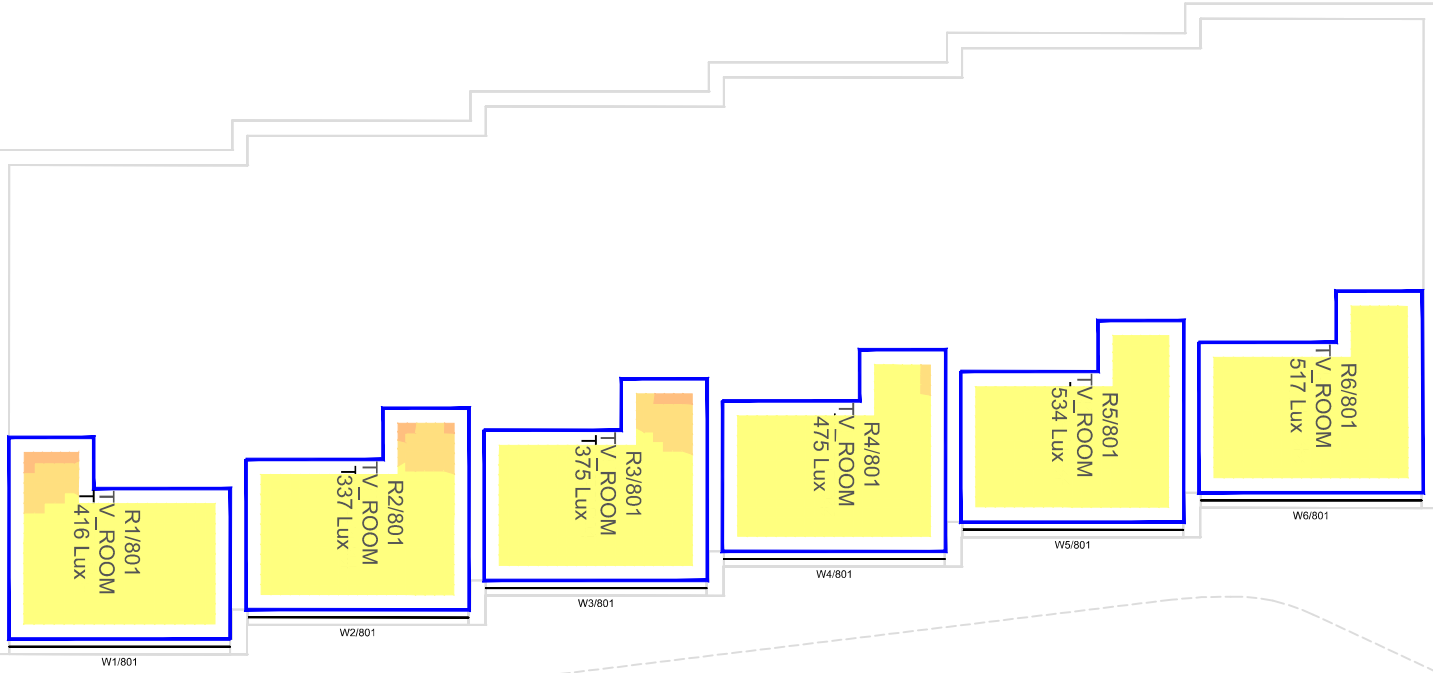
Room Label	Room Use	Room Use Target Illuminance Lux	Median Illuminance Lux	Fraction of Working Plane % Area	BRE ADF(%)
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11 Blackburn Road (Cumulative)

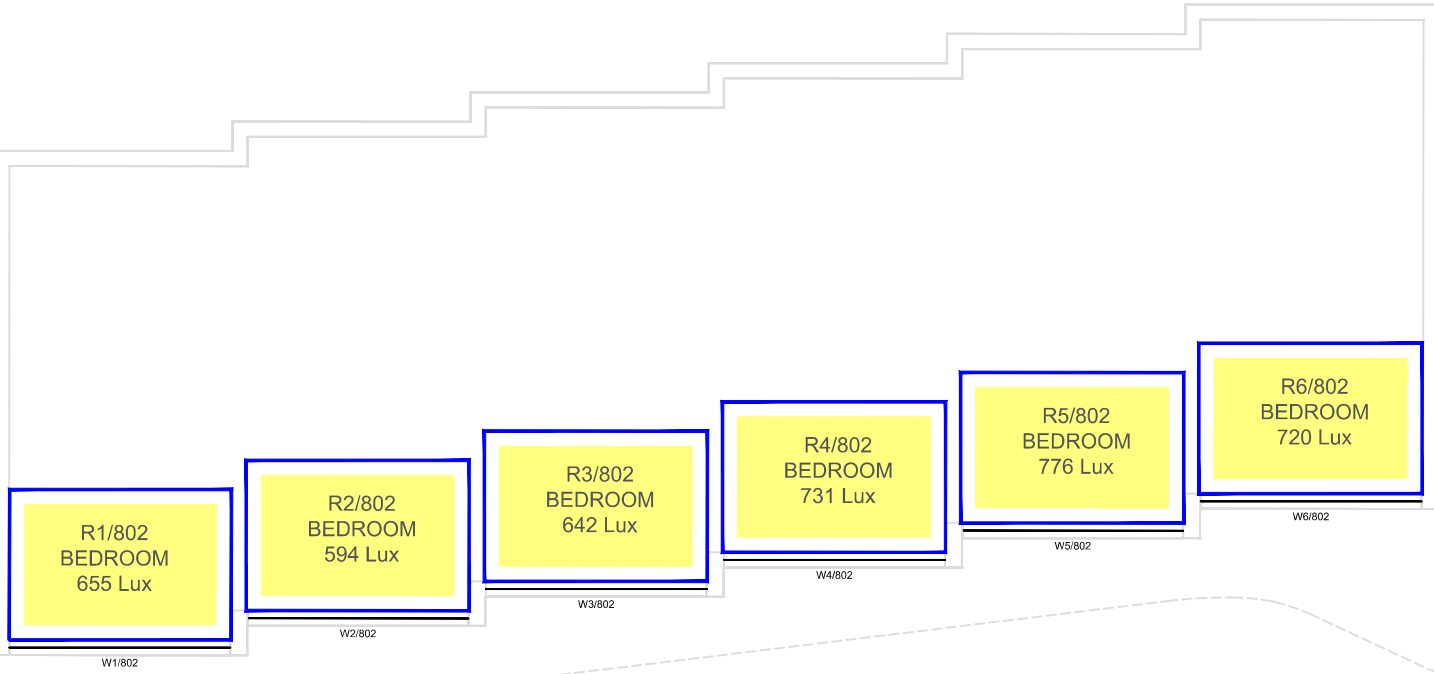
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R2/800	KITCHEN	200	153.2	36.5	2.4
R3/800	KITCHEN	200	180.7	43.4	2.5
R4/800	KITCHEN	200	224.6	59.2	2.6
R5/800	KITCHEN	200	260.3	70.4	2.6
R6/800	KITCHEN	200	255.7	67.6	2.4
R1/801	TV_ROOM	150	416	97.5	3.7
R2/801	TV_ROOM	150	337.3	98.7	3.6
R3/801	TV_ROOM	150	374.9	98.6	3.7
R4/801	TV_ROOM	150	475.3	100	3.9
R5/801	TV_ROOM	150	534.2	100	3.9
R6/801	TV_ROOM	150	517.1	100	3.7
R1/802	BEDROOM	100	654.5	100	4.8
R2/802	BEDROOM	100	593.8	100	4.6
R3/802	BEDROOM	100	641.7	100	4.7
R4/802	BEDROOM	100	730.5	100	4.9
R5/802	BEDROOM	100	776.3	100	4.9
R6/802	BEDROOM	100	720.4	100	4.5



Ground Floor



1st Floor



2nd Floor

Sources: Point 2 Surveyors Ltd
Point Cloud Data
Site Photos
OS Map

Stiff + Trevillion Architects Ltd

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4153-ST-PR-04-(100-104).dwg

Key: Daylight Illuminance
(achieved for 50% over daylight hours)

<50 Lux

>50 Lux

>100 Lux

>150 Lux

>200 Lux

Scheme Confirmed:

-

Date:

-

Project: Asher House, Blackburn Road

Drawn By:

EVI/SA/MG

Scale:

1:150@A3

Date:

SEP 22

Title: Climate Based Daylight Modelling (CBDM) Assessment
Median Illuminance (Lux) Levels

Proposed Scheme 27/05/20
11 Blackburn Road
Balconies Removed for Analysis
Rooms Truncated to 4m

Dwg No:

P1382/CBDM/04

Rel:

12

Point 2 Surveyors Limited, 17 Slingsby Place, London, WC2E 9AB | 0207 836 5828 | point2.co.uk