

5106/SD/JL

Mr Mark Chan
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3rd December 2024

Dear Mr Chan,

**RE: PROPOSED DEVELOPMENT AT 6A GRANGE ROAD, LONDON N6 4AP
DAYLIGHT AND SUNLIGHT AT 6 GRANGE ROAD**

OSM Chartered Surveyors (OSM) have been instructed by Mr Amlani, the owner of 6A Grange Road, to carry out an independent review of the scheme drawings relevant to the recent planning application reference HGY/2024/1676 and the associated BRE Client Report on Daylight and Sunlight dated 22nd October 2024, ("BRE SD Client Report") as referenced P124306-1003 Issue:4.

OSM have also been instructed to review and comment on a subsequent letter of objection to the proposed development from Right of Light Consulting dated 15th August 2024 ("the Letter of Objection") sent on behalf of the owners at 6 Grange Road, which is located to the immediate northwest of the development site at 6A Grange Road. The Letter of Objection primarily raised concern over the potential impact the proposed scheme may have on daylight and sunlight levels reaching the side-facing windows of the first floor bedroom of 6 Grange Road.

OSM have been made aware, for context, that a different scheme design achieved planning approval in relation to the site at 6A Grange Road in 2018, known as 'the 2018 scheme'

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The Relevant Guidance on Daylight and Sunlight

The relevant guidance on daylight and sunlight is as set out in 'Site layout planning for daylight and sunlight' (BRE document ref: SLP BR 209 2022 ("the BRE Guide")). The BRE Guide is widely relied upon by Local Authorities when assessing proposed new developments in relation to daylight and sunlight matters. The BRE Guide states that whilst it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design.

Daylight Analysis at 6 Grange Road

1. The Baseline 'Before Development Scenario'

It is understood the development site at 6A Grange Road has been empty since 2018, after the scheme design achieved planning approval. The 'previous existing' building on the site was a two-storey house with a pitched roof, which was subsequently demolished.

The Planning Officer approved a comparison be made between the potential impact of the proposed scheme against the impact from the previous existing building, and the potential impact from 'the 2018 scheme'.

The BRE Guide states in the introduction, at paragraph 1.6:

"In special circumstances the developer or planning authority may wish to use different target values."

At Appendix F, the BRE Guide states at paragraph F2:

"In assessing the loss of light to existing windows nearby, a local authority may allow the vertical sky component (VSC) and annual probable sunlight hours (APSH) for the permitted scheme to be used as alternative benchmarks."

As stated in the BRE Guide, previous consented schemes may be considered as benchmarks, for context, and this comparison has therefore been set out in the BRE SD Client Report.

2. The Results of the Technical Daylight and Sunlight Assessment

The BRE SD Client Report states the technical analysis carried out at 6 Grange Road was based on a site visit whereby the relevant rooms were surveyed internally. Therefore, the results of the technical assessments that are set out in the BRE SD Client Report, in particular the NSL (daylight distribution) assessment, are likely to be sufficiently accurate. With the baseline 'previous existing' building in place, the results of the Daylight Vertical Sky Component (VSC) assessment indicate that the two bedroom windows at first floor level would receive a reduction in VSC of between 0.69 and 0.72 at windows E and F respectively after development of the proposed scheme.

In respect of testing daylight at existing properties, the BRE Guide states at paragraph 2.2.10;

*"Where room layouts are known (for example if they are available on the local authority's planning portal), the impact on the daylighting distribution in the existing building should be found by plotting the no sky line in each of the main rooms. For houses this would include living rooms, dining rooms, and kitchens; **bedrooms should also be analysed although they are less important.**"*

As set out in the BRE SD Client Report, the result of the daylight NSL assessment after development of the proposed scheme for the first floor bedroom would be 0.83 (i.e. within 0.8 times the former value), whereby 97% of the bedroom's area would have a view of the sky at working plane level with the 'previous existing' house on the site, and 80% of the bedroom's area would have a view of the sky at working plane level with the proposed scheme in place. It may therefore be concluded that the non-material reduction in daylight NSL may not be noticeable to the occupants of the first floor bedroom at No. 6 once the proposed scheme is built.

The BRE Guide states that, if following construction of a new development, the no-sky line (NSL) moves so that the area of the existing room, which does receive direct skylight, is reduced to less than 0.80 times its former value this will be noticeable to the occupants, and more of the room will appear poorly lit.

3. Conclusion

The impact of the proposed scheme on daylight levels at No. 6 is likely acceptable on the basis that the daylight NSL assessment results, as outlined in the BRE SD Client Report, confirm all the rooms tested at No. 6 would meet the criteria for daylight NSL, including the first floor bedroom. In any case, according to the BRE Guide, bedrooms are considered less important than living rooms, dining rooms, and kitchens.

The results of the Annual Probably Sunlight Hours assessment at No. 6 confirm that, following development of the proposed scheme, the two first floor bedroom windows would comfortably meet the criteria for sunlight both annually and during the winter months, as set out in the subsequently updated BRE SD Client Report.

In consideration of the above, the planning officer may consider the proposed scheme's effect on No. 6 Grange Road to be acceptable.

Yours sincerely,

OSM Chartered Surveyors

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