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London Borough of Haringey
10 Station Road
London
N22 7TR

17 December 2024

Dear Mr Chan

Application Reference No. HGY/2024/1676

**Proposed Development at 6A Grange Road, London N6 4AP
Impact on 6 Grange Road**

As per our previous correspondence, we are appointed by Mr Peter Schulz and Mr Edwin Cossio Murillo, the owners of 6 Grange Road. Our clients are concerned about the impact that the proposed three-storey, five-bedroom (replacement) dwellinghouse with basement level over the vacant plot at 6A Grange Road will have on the natural light receivable by No 6.

As a matter of formality, please treat this letter as an objection on behalf of our clients. However, we are instructed that our clients do not object in principle to 6A Grange Road being developed. This is providing any proposal is designed in accordance with the relevant standards relating to daylight and sunlight (as well as all other relevant matters).

We have previously been instructed to consider the application for the site under HGY/2022/1888, which we understand was withdrawn. The basis of our previous objection was that it was not accompanied by a calculated daylight and sunlight assessment, considering the impact of the proposed development on the light received by our clients' property.

We note that the application includes a calculated assessment, undertaken by BRE, for which we have previously provided comments (letter dated 15 August 2024). We are now instructed to review the latest BRE report, dated 6 December 2024, along with the independent review from OSM Surveyors, dated 3 December 2024. We do think it is worth noting however the review letter pre-dates the latest BRE report to which it is referring.

Firstly, we note that the results of the latest BRE report are the same as the previous BRE report, with two bedroom windows (labelled E and F in the report) falling short of the Vertical Sky Component test. Windows E and F would be left with VSC scores below 27% and less than 0.8 times their former values. The windows would be left with a VSC of 23.5% and 21.9% respectively, equating to reduction ratios of 0.65 and 0.6.

We note that the daylight distribution (DD) test has also been applied and the results demonstrate the rooms at our client's property would meet the BRE recommendations. However, the BRE Guide states in para 2.2.5 that both total amount of skylight and its distribution within buildings are important. The proposed development passing the DD test does therefore not mitigate the breach of the VSC test in relation to the bedroom at our client's property.

The report also now includes the results for the Annual Probable Sunlight Hours test, where the previous version had excluded this test from the assessment and the report.

We have previously raised the issue of the previously consented scheme (HGY/2016/3135) being used as a benchmark for the updated scheme. The BRE report has addressed this in the latest version, at paragraph 4.1.2, that confirms it is inappropriate to treat a planning permission in the same way as an existing building. The BRE report does compare the absolute loss between each of the schemes in section 4.2. However, we have been made aware that the HGY/2016/3135 drawings contained errors in relation to the heights and dimensions, including the depth of No. 6. We have also highlighted previously that as permission for the previous scheme has now expired, we are of the opinion that the comparison of the absolute loss remains inappropriate.

Additionally, the planning application for the 2018 permission did not include a daylight and sunlight assessment that considers the loss of light at our clients' property. Therefore, whilst the scheme was approved, it was not in the full knowledge of what impact this would have on our clients' property.

With regards to the OSM review, they comment on the appropriateness of the comparison with the previous scheme. They reference Appendix F of the BRE Guide to justify an alternative benchmark. As per our previous letter, we are of the opinion that it is inappropriate to set the extant permission as an alternative benchmark, especially considering there are likely to be issues with the previous drawings, and the lack of a daylight and sunlight assessment with the previous application.

Section 2 of the OSM letter references the results of the BRE assessment. However, they quote the figures 0.69 and 0.72 in relation to the VSC loss for windows E and F at our clients' property. However, these figures relate to the comparison between the previous existing dwelling and the 2018 approved scheme, rather than the total loss of light from the planning application. The letter from OSM does not include the actual VSC loss figures which could be misleading, and the actual loss ratios are much more significant than they have reported at 0.65 and 0.6 against a BRE recommendation of 0.8.

Conclusion

On behalf of our clients, we request that no decision is made in favour of the application until the assessment shows that an amended design complies with all tests in the BRE guide and Haringey Council's planning policies, and specifically Policy DM1 of the Haringey Local Plan, Note 14 to Haringey's Local Information Requirements Consultation Guidance and Policy D6 of the London Plan 2021.

Should you have any queries, or would like to discuss the above concerns, please do not hesitate to contact me.

Yours sincerely

Alice Cook BA (Hons)
Right of Light Surveyor