LOCAL PLANNING AUTHORITY REF: PLAN/2019/1176

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)

APPEAL UNDER SECTION 78 OF THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) BY TRIBE AVONMOUTH HOUSE LTD AGAINST THE NON-DETERMINATION OF PLANNING APPLICATION 21/AP/4297 BY THE LONDON BOROUGH OF SOUTHWARK FOR THE MIXED-USE REDEVELOPMENT OF AVONMOUTH HOUSE, 6 AVONMOUTH STREET, LONDON, SE1 6NX

APPEAL REFERENCE APP/A5840/W/22/3303205

PROOF OF EVIDENCE

OF

LJ DUNFORD BSc (hons) MScSurv FRGS

16/11/2022

1. Qualifications & Experience

1.1 Liam J Dunford BSc(Hons) MSc (Surv) FRGS. I advise exclusively on Daylight/Sunlight and Rights of Light matters. I have practiced in this specialism for over 16 years. I trained with Gordon Ingram before joining Savills to start and run the Daylight/Sunlight team before being promoted to Director. I founded Point 2 Surveyors in 2014. We are a leading consultancy within this field with over 75 staff. We are unique in that we design and write our own software. Aside from providing client consultancy we are also trusted to provide daylight software/calculations to other leading practices. Prior to specialising as a Daylight consultant, I was a Naval Officer working on Hydrographic survey vessels. I hold a Master's degree in Surveying from the University of Reading, where I specialised in daylight. I regularly present lectures and CPD talks on these subjects; these have included RICS and the Property Bar Association. I am a member of the Chartered Institution of Building Services Engineers ('CIBSE') daylight group and was a consultee for the latest edition of BRE Guide 209; *Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice* (2022)[1]. I am the technical author and contributor to the leading text '*The Law of Rights of Light*' by Jonathan Karas KC**.**

1.2 My work includes detailed design stage advice, to ensure a developing scheme reacts appropriately to its context and provides amenity within properties and to open space, as well as the preparation of final planning reports assessing the impact of a Scheme by reference to the appropriate planning policy. I have substantial experience, having worked directly on well over several hundred projects and knowledge of Point 2's wider projects that amount to over 3000. These have ranged from small residential extensions to large City of London towers and mixed-use master-planning throughout London and the UK. A selection of current clients

[1] Refer to Core Documents 7.34

includes Whitbread, Land Securities, Notting Hill Housing Association, Royal London, Legal & General, Crossrail/TFL, HM Government of Gibraltar and various local authorities such as London Borough of Islington, London Borough of Camden, London Borough of Hounslow, City of Westminster and Harpenden Town Council. I often provide third party reviews for major developments and have prepared proof of evidence/expert witness reports for various planning appeals and court cases. We have recently been commissioned to undertake daylight research for the GLA and City of Westminster.

1.3 The evidence which I have prepared and provide for this appeal in this proof of evidence is true. It has been prepared and is given in accordance with Building Research Establishment guidance, and I confirm that the opinions expressed are my true and professional opinions.

2. Introduction

2.1 I am instructed by Tribe Avonmouth House Ltd ("the Appellant"). Point 2 were initially instructed to advise on the project in May 2021, and we provided a Daylight, Sunlight and Overshadowing Report in September 2021 for submission with the planning application.

2.2 This report assessed the proposal in relation to the guidance set out within The Building Research Establishment (BRE) Report 'Site layout planning for daylight and sunlight - A guide to good practice'. This guidance is usually adopted by Local Authorities as the primary means by which to assess the acceptability of a scheme.

2.3 A revised version of the BRE Report was published in June 2022. Therefore, in July 2022 we provided a Technical Note discussing the implications of this, assessing the proposal in relation to updated methodology where appropriate.

2.4 This proof relates to the non-determination of planning application 21/AP/4297 –

The demolition of existing building and structures and erection of a part 2, part 7, part 14, part 16 storey plus basement mixed-use development comprising 1733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure.

2.5 This document should be read in conjunction with our Daylight and Sunlight Report dated September 2021, which was submitted as part of the application bundle, and the aforementioned July 2022 Technical Note.

2.6 However, it should be noted that in the process of compiling information for this proof of evidence, we have sourced further layout information in respect of the surrounding properties, and therefore our analysis has been updated accordingly.

2.7 Daylight and Sunlight is not mentioned within Southwark Council's statement of case and is therefore not identified as a putative reason for refusal. However, as there would be some reductions, and 'loss of light' has been mentioned by third parties in 8 objections to the application, this proof of evidence relates specifically to the loss of light to the residential properties surrounding the site. This includes an assessment of sunlight amenity to the small courtyard garden space to the rear of 2 Avonmouth Street.

2.8 While our Daylight, Sunlight and Overshadowing report also considered overshadowing effects to Newington Garden to the east of the site, it concluded that the effects would be in full accordance with guidance, and that sunlight amenity to this park would remain excellent after development. As such, our opinion is that overshadowing to Newington Garden is not a live issue, and it is not discussed further as part of this proof of evidence.

2.9 Similarly, our Report and subsequent Technical Note considered daylight amenity to the accommodation within the proposal. Overall compliance rates with the new BRE June 2022 CBDM targets will be over 98%. As reported, this is an excellent level of compliance, and as such our opinion is that internal daylight could not be considered as reason for refusal, and it is not discussed further as part of this proof of evidence.

2.10 Drawings showing the existing building occupying the site can be found at Appendix A. Drawings showing the Proposed Scheme can be found at Appendix B.

2.11 The proof is structured in the following sections and supporting appendices:

- Section 3 – Policy;
- Section 4 – Approach
- Section 5 – BRE Guidelines on Daylight and Sunlight
- Section 6 – Setting Appropriate Alternative Targets
- Section 7 – Context and Precedents
- Section 8 – Assessment of the Effects of Proposed Scheme on Telford House;
- Section 9 – Assessment of the Effects of Proposed Scheme on Stephenson House;
- Section 10 – Assessment of the Effects of Proposed Scheme on 57-61 Newington Causeway (Balppa House);
- Section 11 – Assessment of the Effects of Proposed Scheme on 2 Avonmouth Street
- Section 12 – Summary and Conclusion

Appendices A-H contain the following data and supporting information:

- Appendix A – Existing Drawings;
- Appendix B –Proposed Scheme Drawings;
- Appendix C – Assessment Methodology;
- Appendix D – Telford House Tabular VSC, DD, APSH Results, Window Maps and DD Contour Plots;
- Appendix E – Stephenson House VSC, DD, APSH Results, Window Maps and DD Contour Plots;
- Appendix F – 57-61 Newington Causeway (Balppa House) VSC, DD, APSH Results, Window Maps and DD Contour Plots;

- Appendix G – 2 Avonmouth Street VSC, DD, APSH Results, Window Maps, DD Contour Plots and BRE 2 Hour Sun on Ground Assessment;
- Appendix H – Standard Survey Limitations.

3. Policy

3.1 Before considering the daylight and sunlight effects of the proposal, I think it appropriate to set out some matters of policy and approach.

3.2 The National Planning Policy Framework (paragraph 125 (c))[2] concentrates on whether satisfactory levels of amenity will remain, at the same time emphasising the importance of flexibility and the use of targets alternative to those set out in BRE Guide stating, "*authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards)".*

3.3 The Mayor's housing SPG[3] in paragraph 1.3.45 states *"Policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time."*

[2] Refer to Core Documents 7.0, paragraph 125 (C)
[3] Refer to Core Documents 7.11 paragraphs 1.3.45 & 1.3.46

3.4 Furthermore paragraph 1.3.46 states, *"The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm."*

3.5 Within The Southwark Plan, 2022[4], Development Management Policy P14 – Design quality states that*, "Development must provide: ... Adequate daylight, sunlight, outlook, and a comfortable microclimate including good acoustic design for new and existing residents;"*

3.6 Development Management Policy P17 – Tall Buildings - states that, *"The design of tall buildings will be required to ... Avoid harmful and uncomfortable impacts including ... overshadowing…"*

4. Approach

4.1 It is accepted that the assessment of daylight is a two-stage process. In the Rainbird case,[5] the judge noted that the assessment of impact on daylight and sunlight amenity was a two-part process:

• First, as a matter of calculation, whether there would be a material deterioration in conditions,

• and second, as a matter of judgment, whether that deterioration would be acceptable in the particular circumstances of the case, including the local context.

[4] Refer to Core Documents 7.2
[5] Refer to Core Documents 8.31

4.2 Similarly, in the recent Goldworth Road, Woking Appeal[6] the inspector noted that *"applying the BRE guidance, is only the first stage in a necessary two stage test; the second stage being consideration of context, including planning policy and wider amenity issues."*

5. Assessment Methodology

5.1 The BRE guidelines provide two principal measures of daylight for assessing the impact on properties neighbouring a site, namely Vertical Sky Component (VSC) and No-Sky Line (NSL). In relation to assessing sunlight, the BRE provide the Annual Probable Sunlight Hours (APSH) methodology. In relation to overshadowing we apply the quantitative BRE sun on ground guidance.

5.2 These measures of daylight and sunlight are detailed at Appendix C.

5.3 To enable the calculations, a 3D computer model of the existing site, the proposal and the relevant surrounding properties has been constructed.

5.4 Each of the methods of assessment focuses on the proportional reductions in daylight, and whether these will be noticeable. It should be noted that the 3 assessments all provide a different informative in coming to a professional opinion on the extent of change, as well as whether the level of retained amenity would be considered acceptable.

5.5 Furthermore, it has been held on appeal that 'noticeable' is not to be equated with 'unacceptable'.

5.6 The following extract from the inspector's report on the West End Green site near Paddington[7] gives pragmatic guidance on the interpretation of the default BRE criteria:

[6] Refer to Core Documents 8.32
[7] Refer to Core Documents 8.33

"13.103 According to the BRE Guide, a Vertical Sky Component (VSC) of 27% will give the potential for good interior diffuse daylighting. A reduction in VSC to less than both 27% and 80% of its former value will be noticeable. 'Noticeable', however, is not to be equated with 'unacceptable'. And, as its introduction acknowledges, the Guide is just that - 'although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design'. That is true in urban areas especially, where VSCs very much lower than 27% do not seem to diminish the attraction of some popular residential areas."

5.7 Furthermore, in its introduction, the BRE guide itself urges that the guidelines be interpreted flexibly:

"The advice given here is not mandatory……Although it gives numerical guidelines these should be interpreted flexibly.....For example in an historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings....."

6. Setting Appropriate Alternative Targets

6.1 The default nationwide BRE numerical criteria are based on 25 degree development angles, which are frequently inappropriate, and indeed unachievable, in urban areas.

6.2 In its introduction, the BRE guide itself urges that the guidelines be interpreted flexibly:

"The advice given here is not mandatory……Although it gives numerical guidelines these should be interpreted flexibly.....For example in an historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings....."

6.3 Again, this need for flexibility is also acknowledged in The National Planning Policy Framework at paragraph 125(c).

6.4 Given the modest massing that currently occupies the Appeal Site (2 storeys), existing light levels currently reaching the neighbouring properties are extremely good, and any massing that sets to meet appropriate densities for the area will result in some proportional reductions in light that are in excess of the guideline figures.

6.5 It is therefore important to consider the retained levels of amenity and whether they remain acceptable, giving consideration to the site context.

6.6 Appendix F of the BRE Guide provides advice on setting alternative targets for access to daylight and sunlight. In relation to the default targets, it says; "*These values are purely advisory and different targets may be used … for example, in a mews in a historic city centre, a typical obstruction angle might be close to 40 degrees. This would correspond to a VSC of 18%, which could be used as a target.*'

6.7 Appendix F includes a table that provides the corresponding VSC's for a range of development angles. It is important to note that the logical and mathematical consequence of the correspondence of VSC to development angle is that VSC is measured on a plain façade (i.e., discounting the effects of constraining elements such as balconies).

6.8 Appendix F, paragraph F6 says *"In assessing the loss of light to an existing building, the VSC is generally recommended as the appropriate parameter to use. This is because the VSC depends only on obstruction, and is therefore a measure of the daylit environment as a whole."*

6.9 It is notable that neither NSL nor APSH are recommended for use with alternative targets in relation to the assessment of neighbouring properties.

6.10 In many areas, development angles of 40 degrees, or more, are common and a VSC of 18% has been used as a reasonable and accepted level of daylight in many desirable urban areas for well over a century.

6.11 Furthermore, in recent years, the need to make best use of available land means that the redevelopment of previously comparatively low rise, low density sites has required an increase in density, with corresponding increases in typical development angles and reductions in daylight.

6.12 As noted above, such targets apply to unfettered plain facades. The presence of balconies and large roof overhangs can dramatically reduce VSC values at windows neighbouring a site, and for this reason the VSC figures under such massing should not be used to judge the acceptability of proposed massing.

6.13 This is acknowledged at paragraph 2.2.11 of the BRE guide, where it is stated that:

"Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct skylight."

7. Context and Precedents

7.1 In order to determine appropriate daylight targets it is necessary to consider the site context. Levels of acceptability vary with context. Further, the approach taken to what are acceptable levels of daylight and sunlight in similar contexts also assists in determining appropriate targets.

7.2 In relation to the Appeal Site and the immediate surrounding area, the recent construction of the new building at 87 Newington Causeway, to the south-west of the site, will have had a

noticeable effect on Telford House. VSC values reaching the portion of Telford House located opposite 87 Newington Causeway are now in the region of 15%-16%; VSC values to the windows located below the external access decks are significantly below this level (circa 4% at ground floor level).

7.3 In the appeal decision for the allowed development at Land to the north and south of Goldworth Road, Woking (Appeal Ref: APP/A3655/W/21/3276474)[8] the Inspector states that, *"Retaining a VSC level of 27% in neighbouring properties is unrealistic; as has been recognised in many appeal decisions and other documents. Even retaining 20% VSC is considered, generally, to be reasonably good, and in urban areas retaining around mid-teen % VSC is considered to be acceptable. All habitable rooms in apartments at the Victoria Square development, with balconies appropriately excluded from an assessment, would have retained VSC levels in excess of 19%."*

7.4 This confirms that a retained VSC in the mid-teens, excluding the effects of the affected properties balconies from the assessment, is an acceptable target in an urban area.

7.5 Within the London Borough of Camden, the Officers' Report[9] for the Redevelopment of the Royal National Throat, Nose And Ear Hospital Site, 330 Gray's Inn Road (Application Number 2020/5593/P) notes at paragraph 13.15 that, in relation to 57-59 Swinton Street (residential properties opposite the site across Swinton Street), *"The windows at second and third floor all retain above 15% VSC, which means figures in the mid-teens would be retained. These levels have been considered acceptable in similar urban environments in other permitted schemes and appeals. The windows at first floor retain 13%-14% VSC and between 11%-12% at ground floor."*

[8] Refer to Core Documents 8.32, paragraph 35
[9] Refer to Core Documents 8.35 paragraph 13.15

7.6 This confirms that a mid-teens VSC target was considered acceptable in relation to the redevelopment of this site. Indeed, lower levels were accepted in relation to windows at ground floor level.

7.7 The Camden Case Officer's Report for the redevelopment of 70-86 Royal College Street (Reference 2020/0728/P) [10] , which was subsequently granted approval on 03/02/2021, also refers to the acceptability of alternative VSC targets in the mid-teens. At paragraph 8.11 it states, "*Officers also note that Point 2 were also the authors of the sunlight and daylight report for the proposed development at St Pancras Commercial Centre (application reference 2019/4201/P) which was approved at Planning Committee in January. The report for this application used the same 15% VSC target as the report for the current application, which was considered acceptable by officers and subsequently approved by members.*"

7.8 Similarly, in relation to the Whitechapel Estate Appeal (Reference: APP/E5900/W/17/3171437) [11], the Inspector stated that:

"The figures show that a proportion of residual Vertical Sky Component ('VSC') values in the mid-teens have been found acceptable in major developments across London. This echoes the Mayor's endorsement in the pre- SPG decision at Monmouth House, Islington that VSC values in the mid-teens are acceptable in an inner urban environment. They also show a smaller proportion in the bands below 15%. Even if there were some discrepancy in the appellants' figures for this lower band at Whitechapel Central, which is disputed, the VSC outcomes for the appeal proposal would in general be very similar to those of the other major schemes. The appeal proposal would therefore appear to be in compliance with the LP as amplified by the

[10] Refer to Core Documents 8.36, paragraph 8.11
[11] Refer to Core Documents 8.34, paragraph 112

SPG and as it is being interpreted by the Mayor. The GLA responses to the planning application did not raise any concern about neighbours' amenity."

7.9 Another helpful indication of such alternative targets has been set out by Delva Patman Redler in their advice (letter dated 7th June 2019)[12] for the Winstanley Estate case in the London Borough of Wandsworth. They stated**:**

"Having regard to this context and the applicant's consultant's experience elsewhere, including on the Whitechapel Estate appeal that I have referred to above, the standalone report proposes the following alternative target values for daylight and sunlight to dwellings:

- *Vertical sky component: 15% VSC instead of the BRE standard target of 27% VSC*

… Assuming my understanding is correct, I believe this approach is reasonable in principle and that the suggested alternative target values are not unreasonable for a dense urban area."

7.10 They also refer to the Whitechapel Estate decision (mentioned at paragraph 7.10 above) stating that, in relation to VSC, "*A noticeable adverse effect might therefore nonetheless be considered acceptable if, in an urban area like London, a proportion of retained daylight levels would be in the mid-teens for VSC, with a smaller proportion in the bands below 15% VSC.*"

7.11 The following extract from the inspector's report on the West End Green site near Paddington[13] (decision date 10th October 2005) also gives pragmatic guidance on the interpretation of the default BRE criteria. At paragraph 13.103 is states:

"13.103 According to the BRE Guide, a Vertical Sky Component (VSC) of 27% will give the potential for good interior diffuse daylighting. A reduction in VSC to less than both 27% and 80% of its former value will be noticeable. 'Noticeable', however, is not to be equated with

[12] Refer to Core Documents 8.37 section 2.6
[13] Refer to Core Documents 8.33, paragraph 13.103

'unacceptable'. And, as its introduction acknowledges, the Guide is just that - 'although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design'. That is true in urban areas especially, where VSCs very much lower than 27% do not seem to diminish the attraction of some popular residential areas."

7.12 Having reviewed the policy, precedents and site context, I consider that a mid-teens VSC target is appropriate in relation to the redevelopment of the Appeal Site.

8. Assessment of Effects on Telford House

8.1 As the site is located to the north of Telford House, sunlight is not an issue.

8.2 Drawings showing windows locations, the internal arrangements used in the analysis, and the associated NSL contours and daylight figures for Telford House can be found at Appendix D.

8.3 The potentially affected rooms in this property are located behind the north elevation. These consist of hallways, bathrooms/WCs, small kitchens (no more than 8 sq.m. in area) and bedrooms.

8.4 Given the size of the kitchens, they should not be classed as a main habitable space, and as such the effect on them should not be given any weight.

8.5 As detailed within The Southwark Plan Policy P1 Factbox:

"A habitable room is defined as a room with a window within a dwelling that is intended to be used for sleeping, living, cooking or dining, regardless of what it is actually used for. ***This excludes*** *enclosed spaces such as bath or toilet facilities, corridors, landings, hallways, lobbies, utility rooms, and* ***kitchens with an overall floor area of less than 11sqm****."*

8.6 The hallways and bathrooms/WCs are not material for assessment, therefore, while we present the figures for the kitchens, only the effects on the 10 site facing bedrooms require detailed consideration.

8.7 It is important to note that the main living accommodation within the site facing flats is located on the opposite side of the block, and as such will be totally unaffected by the proposed development.

8.8 With reference to the tables of results contained within Appendix D, while there would be noticeable daylight reduction to the bedrooms, discounting the effects of the walkways and roof overhangs, all windows will retain VSC values of at least 23.9%.

8.9 This is a very good level of daylight and is significantly more than the mid-teens target that is appropriate for a central urban location such as this.

8.10 I therefore consider that the overall effects on Telford House are acceptable, and that the site facing north elevation of the property will retain very good access to daylight after development.

9. Assessment of Effects on Stephenson House

9.1 As the site is located to the north of Stephenson House, sunlight is not an issue.

9.2 Drawings showing windows' locations, the internal arrangements used in the analysis, and the associated NSL contours and daylight figures for Stephenson House can be found at Appendix E.

9.3 The potentially affected rooms within this property are located at the north-eastern end of the north-west elevation of the property. These consist of hallways, bathrooms/WCs, small kitchens (no more than 5.5 sq.m. in area) and bedrooms.

9.4 Given the size of the kitchens, they should not be classed as a main habitable space, and as such the effect on them should not be given any weight.

9.5 Again, as detailed within The Southwark Plan Policy P1 Factbox:

"A habitable room is defined as a room with a window within a dwelling that is intended to be used for sleeping, living, cooking or dining, regardless of what it is actually used for. ***This excludes*** *enclosed spaces such as bath or toilet facilities, corridors, landings, hallways, lobbies, utility rooms, and* ***kitchens with an overall floor area of less than 11sqm****."*

9.6 The hallways and bathrooms/WCs are not material for assessment, therefore, while we present the figures for the kitchens, only the effects on the site facing bedrooms require detailed consideration.

9.7 As with Telford House, it is important to note that the main living accommodation within the site facing flats are located on the opposite side of the block, and as such will be totally unaffected by the proposed development.

9.8 With reference to the tables of results contained within Appendix E, while there would be some proportional reductions in VSC in excess of the guideline 20% (and as such could be considered noticeable), the largest absolute reduction in VSC is 4.6% (to 1st floor window W1/121). This is a small absolute level of light loss, and therefore the overall level impact can be considered minor.

9.9 With the effects of the access decks removed (in line with BRE guidance), proportional reductions to all but 2 windows would be less than 20% (i.e., not noticeable). These windows (W8/120 and W8/121) would experience proportional reductions of 22.6% and 20.9% respectively. This is not materially more than the guideline 20%.

9.10 Furthermore, both of these windows are located in a recessed location, directly adjacent to a protruding element of the block. As stated at paragraph 2.2.14 of the BRE guidelines, *"A larger relative reduction in VSC may also be unavoidable if the existing window has projecting wings on one or both sides of it.."*.

9.11 The VSC analysis discounting the access deck effects clearly demonstrates that the proposal will not have a material effect on the levels of light reaching the property.

9.12 This is supported by the NSL analysis, which straightforwardly shows (with the access decks in place) that reductions are small and in full accordance with guidance.

9.13 I therefore consider that there will not be a material effect on the daylight amenity to this property.

10. Assessment of Effects on 57-61 Newington Causeway (Balppa House)

10.1 Drawings showing windows' locations, the internal arrangements used in the analysis, and the associated NSL contours and daylight figures for 57-61 Newington Causeway can be found at Appendix F.

10.2 The site facing windows are located to the rear of the property. The primary windows serving the main living accommodation within the block face onto Avonmouth Street and Newington Causeway, and as such will be unaffected by the redevelopment of the site.

10.3 We have sourced estate agent particulars which show that the 2nd floor room (R2/262) served by W2/262 is an open plan living/kitchen/dining room, with its main window located on the opposite site of the property (and thus totally unaffected). We assume that this arrangement is repeated at 1st and 3rd floors (rooms R2/261 & R2/263)

10.4 Accordingly, we have assessed the effects on 7 rooms that are served by 7 site facing windows. However, as per the above, three of these rooms are dual aspect, with another window located on the opposite side of the property.

Daylight -

10.5 Due to the constrained location of the windows at lower floor levels to the rear of the property, existing light levels reaching them are relatively low, meaning that even small reductions in VSC can result in a larger proportional reduction.

10.6 The figures show that proportional reductions in VSC to 2 of the 7 site-facing windows assessed (W1/263 & W1/264) are less than 20%, and are therefore in accordance with BRE guidance.

10.7 Two further windows (W1/261, W1/262) experience proportional reductions 20.5% and 22.1% respectively. These reductions are only marginally in excess of the guideline 20%, and the absolute losses of 1.2% and 1.9% are very minor. Furthermore, the rooms that these windows serve are both bedrooms, and daylight to bedrooms in less important than that to living rooms.

10.8 The remaining 3 site-facing windows assessed (W2/261, W2/262 & W2/263) serve the dual aspect rooms (R2/261, R2/262 & R2/263 respectively).

10.9 W2/263 at 3rd floor will experience a proportional reduction in VSC of 27.1%. This is not significantly in excess of the guideline 20%, and furthermore the window will retain a VSC of 17.4%, which compares favourably with the mid-teens target that is appropriate for a central urban location such as this.

10.10 The remaining 2 windows experience proportional reductions in VSC of 49.0%, 41.7% and 27.1% respectively. However, these windows receive lower levels of light in the existing

situation (8.6% VSC and 13.9% VSC) and the absolute reductions in VSC are small (4.2% and 5.8%).

10.11 The overall effects on daylight to these rooms will not be material. This is supported by the NSL figures, which show proportional reductions to the rooms of 4.4% and 1.7%, both significantly less than the guideline 20%.

10.12 Indeed, NSL reductions to all rooms within the property fully accord with BRE guidance.

10.13 Overall, I consider that effects on the daylight amenity to this property are acceptable.

Sunlight -

10.14 Each of the 3 potentially affected living/kitchen/dining rooms (R2/261, R2/262 & R2/263), and also room R2/264, will retain very good overall levels of sunlight (at least 28% of APSH, compared to the default BRE target of 25%).

10.15 While reductions to these room are not fully compliant with guidance, this is due to small reductions in winter sunlight. However, this is not unusual in an urban location - for example, in midwinter the sun's maximum elevation is around 15 degrees above the horizon, and this is lower than a typical urban skyline.

10.16 The remaining 3 rooms are all bedrooms, and sunlight to bedrooms is considered less important by the BRE. Room R1/263 retains 18% of APSH; although this is below the BRE guideline target of 25%, it remains a good level of sunlight for an urban location. Room R1/262 experiences an absolute reduction in APSH of 5%, this is only 1% more than the BRE threshold of 4%. Reductions to bedroom R1/261 fully accord with guidance.

10.17 Overall, I consider that the effects on sunlight amenity to this property are acceptable.

11. Assessment of Effects on 2 Avonmouth Street

11.1 Drawings showing windows locations, the internal arrangements used in the analysis, and the associated NSL contours and daylight figures for 2 Avonmouth Street can be found at Appendix G.

11.2 We have assessed 10 windows serving 6 rooms within this property.

Daylight -

11.3 Reductions in VSC to all but one of the windows assessed are small and in full accordance with BRE guidance.

11.4 Window W1/281 experiences a proportional reduction of 28.3%, which is marginally in excess of the guideline 20%. The retained VSC to this window of 23.6% represents a very good level of daylight for an urban location. Furthermore, this window is located in the flank wall of the property and as such it is unlikely that is serves main habitable accommodation.

11.5 Considering NSL, reductions to all rooms are small and in full accordance with BRE guidance.

11.6 The proposal will not have a material effect on the daylight amenity to this property, and accordingly I consider the effects acceptable.

Sunlight -

11.7 Reduction in sunlight to all but one window are in full accordance with BRE guidance. Window W1/282 experiences a reduction in winter sunlight that is in excess of guidance, but again, this is not unusual in an urban location. For example, in midwinter the sun's maximum elevation is around 15 degrees above the horizon, and this is lower than a typical urban skyline. The window retains 30% of total APSH, which is a very good overall level of sunlight.

11.8 The proposal will not have a material effect on the sunlight amenity to this property, and accordingly I consider the effects acceptable.

Overshadowing -

11.9 In relation to overshadowing we have applied the BRE 2 hour sun on ground test to small courtyard garden to the rear of the property. This is the only quantitative method of assessing overshadowing provided by the BRE.

11.10 The results of the analysis show that, due to its constrained location, none of the area of the space assessed can receive 2 hours of sunlight on March 21st in the existing situation. As such there can be no reduction in the area that can do so, and therefore, in relation to the BRE numerical guidance, any effects on the space will not be material.

11.11 Accordingly, I consider the overshadowing effects on the rear garden to this property to be acceptable.

12. Summary and Conclusion

12.1 Liam J Dunford BSc(Hons) MSc (Surv) FRGS. I advise exclusively on Daylight/Sunlight and Rights of Light matters. I have practiced in this specialism for over 16 years.

12.2 My work includes detailed design stage advice, to ensure a developing scheme reacts appropriately to its context and provides amenity within properties and to open space, as well as the preparation of final planning reports assessing the impact of a Scheme by reference to the appropriate planning policy. I have I have substantial experience, having worked directly on well over several hundred projects.

12.3 I often provide third party reviews for major developments and have prepared proof of evidence/expert witness reports for various planning appeals and court cases.

12.4 This proof relates to the non-determination of planning application 21/AP/4297.

12.5 Daylight and Sunlight is not mentioned within Southwark Council's statement of case and is therefore not identified as a putative reason for refusal. However, as there would be some reductions, and 'loss of light' has been mentioned by third parties in 8 objections to the application, this proof of evidence relates specifically to the loss of light to the residential properties surrounding the site. This includes an assessment of sunlight amenity to the small courtyard garden space to the rear of 2 Avonmouth Street.

12.6 Daylight and sunlight are assessed by reference to the BRE Guide 209; *Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice* (2022). To assess daylight, the BRE Guide suggests using the Vertical Sky Component (VSC) and Daylight Distribution (NSL) tests; to assess sunlight, the Guide suggests using the Annual Probable Sunlight Hours (APSH) test; and in relation to overshadowing we apply the quantitative BRE sun on ground guidance. No other common Guidance exists.

12.7 The Guide sets out to establish if the loss of light is noticeable, it does not consider in any detail the level of retained daylight and its suitability or not. It applies equally to rural England as it does in the most-dense city centres such as Southwark. The BRE Guide states at paragraph 1.6, that:

"The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design."

12.8 Following from this, it is accepted that the assessment of daylight is a two-stage process. In the Rainbird case, the judge noted that the assessment of impact on daylight and sunlight amenity was a two-part process:

• First, as a matter of calculation, whether there would be a material deterioration in conditions,

• and second, as a matter of judgment, whether that deterioration would be acceptable in the particular circumstances of the case, including the local context.

12.9 Given the modest massing that currently occupies the Appeal Site (2 storeys), existing light levels currently reaching the neighbouring properties are extremely good, and any massing that sets to meet appropriate densities for the area will result in some proportional reductions in light that are in excess of the guideline figures. It is therefore important to consider the retained levels of amenity and whether they remain acceptable, giving consideration to the site context.

12.10 In relation to **Telford House**, windows on the site facing elevation show some noticeable reductions in VSC which are amplified by the presence of access decks and roof overhangs. However, the VSCs to windows under overhanging massing should not be used judge the acceptability of the impact of a proposed scheme. Once the effect of the access decks and roof overhangs is discounted, the retained VSC levels for all site facing rooms will be at least 23.9%. This is a very good level of daylight and is significantly more than the mid-teens target that is appropriate for a central urban location such as this.

12.11 As the site is located to the north of Telford House, sunlight is not an issue.

12.12 In relation to **Stephenson House**, the VSC analysis discounting the effects of the access decks clearly demonstrates that the proposal will not have a material effect on the levels of light reaching the property. This is supported by the NSL analysis, which straightforwardly shows (with the access decks in place) that reductions are small and in full accordance with guidance.

12.13 As the site is located to the north of Stephenson House, sunlight is not an issue.

12.14 In relation to **57-61 Newington Causeway**, it is noted that the site facing windows are located to the rear of the property. The primary windows serving the main living accommodation within the block face onto Avonmouth Street and Newington Causeway, and as such will be unaffected by the redevelopment of the site.

12.15 Due to the constrained location of the windows at lower floor levels to the rear of the property, existing light levels reaching them are relatively low, meaning that even small absolute reductions in VSC result in some larger proportional reductions. However, I consider that the overall effects on daylight will not be material, and this is supported by the NSL analysis which shows that reductions to all rooms within the property fully accord with BRE guidance.

12.16 In relation to sunlight, overall amenity to the main living rooms within the property will remain very good after development. The rooms will retain at least 28% of APSH, compared to the default BRE target of 25%.

12.17 In relation to **2 Avonmouth Street,** the overall effects on daylight and sunlight will be small. In each case reductions to all but one window will fully accord with default guidance. The overall retained levels of daylight and sunlight to the respective windows that do not fully accord with guidance remain very good.

12.18 In relation to overshadowing to the rear courtyard garden, we have applied the quantitative assessment methodology provided by the BRE, and this shows that there will not be a material change in sunlight amenity.

12.19 In conclusion, I have carefully reviewed the impact of the scheme on the neighbouring properties in terms of daylight and sunlight. Although there are effects, giving consideration to the urban context, retained levels of daylight and sunlight to the surrounding properties will

remain more than satisfactory after development. The effects are, therefore, in my view acceptable and will be commensurate with similar sites and localities.

APPENDIX A – Existing Drawings

Sources: LRM Survey Services
2D Survey (received 07/06/21)
Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

Stitch Architects
Proposed Scheme 3D Model (received 13/07/21)
210712-Massing.skp

Key: Existing Buildings
Proposed Scheme

Project: Avonmouth House

Title: Site Plan
Existing Buildings

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	SA/BW	1:1000	AUG 21	P2747/01	02

POINT 2

Sources: LRM Survey Services
2D Survey (received 07/06/21)
Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

Stitch Architects
Proposed Scheme 3D Model (received 13/07/21)
210712-Massing.skp

Key: Existing Buildings
Proposed Scheme

All Heights in mm AOD

Project: Avonmouth House

Title: 3D View
Existing Buildings

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	SA/BW	NTS	AUG 21	P2747/02	02

POINT 2

Sources: LRM Survey Survices
2D Survey (received 07/06/21)
Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

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210712-Massing.skp

Key: Existing Buildings
Proposed Scheme

All Heights in mm AOD

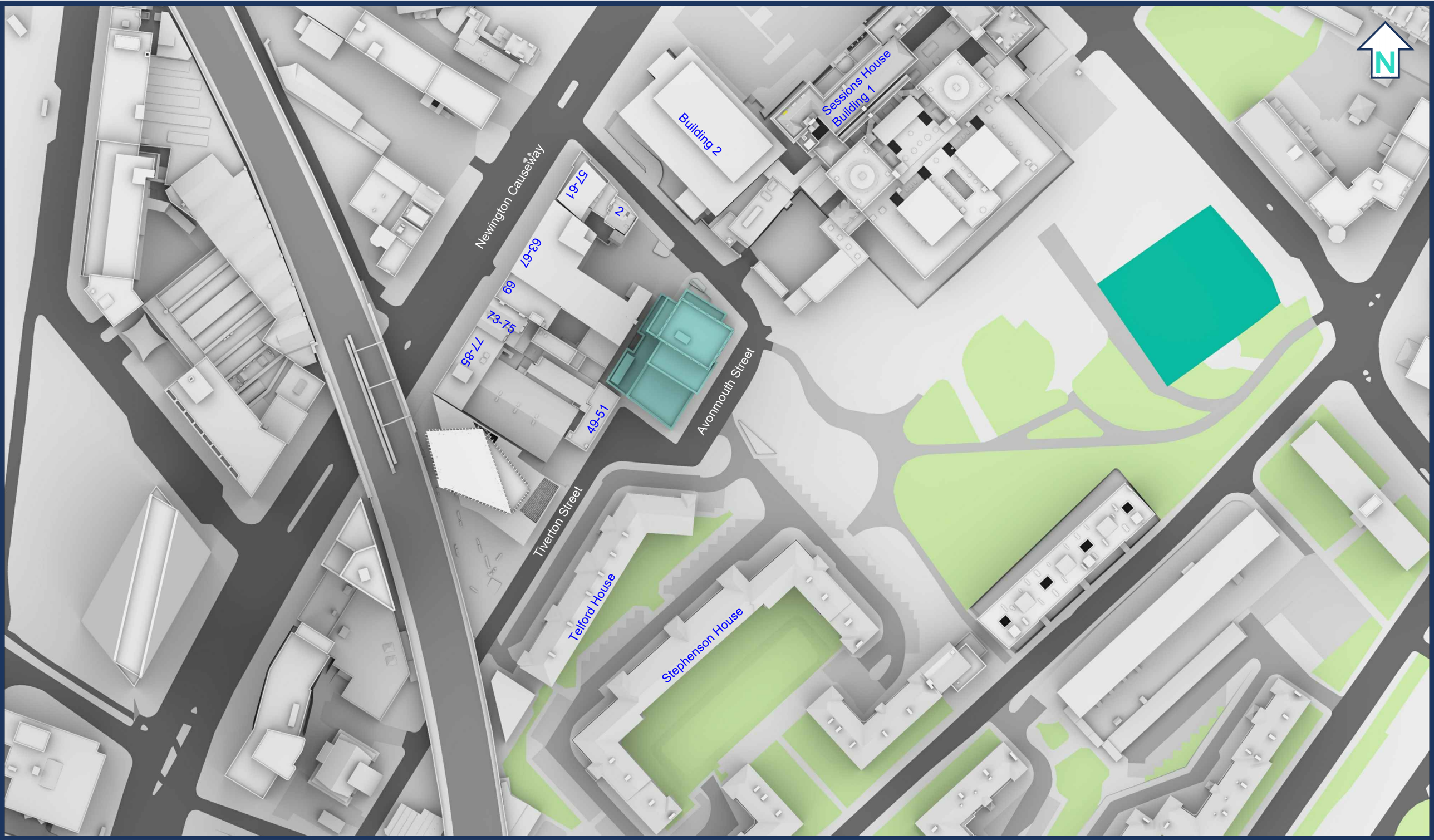
Project: Avonmouth House

Title: 3D View
Existing Buildings

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	SA/BW	NTS	AUG 21	P2747/03	02

POINT 2

APPENDIX B – Proposed Drawings



Sources: LRM Survey Survices
2D Survey (received 07/06/21)
Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

Stitch Architects
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210712-Massing.skp
Proposed Scheme 3D Model (received 07/09/21)
210907-AvonmouthModel.skp
21235-STCH-XX-ZZ-DR-A-0200-0203.pdf
21235-STCH-SK-50-Geolocation.pdf
Proposed Scheme 2D Data (received 09/09/21)
21235-STCH-XX-02-DR-A-0103-Level 02.dwg
21235-STCH-XX-ZZ-DR-A-0300-Proposed building - Section AA.dwg
21235-STCH-XX-ZZ-DR-A-0201-Proposed building - East elevation.dwg

Key: Existing Buildings
Proposed Scheme

Project: Avonmouth House

Title: Site Plan
Proposed Scheme 07/09/21

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	HE	1:1000	Sep 21	P2747/07	03

POINT 2

Sources: LRM Survey Survices
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Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

Stitch Architects
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21235-STCH-XX-ZZ-DR-A-0200-0203.pdf
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Proposed Scheme 2D Data (received 09/09/21)
21235-STCH-XX-02-DR-A-0103-Level 02.dwg
21235-STCH-XX-ZZ-DR-A-0300-Proposed building - Section AA.dwg
21235-STCH-XX-ZZ-DR-A-0201-Proposed building - East elevation.dwg

Key: Existing Buildings
Proposed Scheme

All Heights in mm AOD

Project: Avonmouth House

Title: 3D View
Proposed Scheme 07/09/21

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	HE	NTS	Sep 21	P2747/08	03

Sources: LRM Survey Survices
2D Survey (received 07/06/21)
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Stitch Architects
Proposed Scheme 3D Model (received 13/07/21)
210712-Massing.skp
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21235-STCH-XX-02-DR-A-0103-Level 02.dwg
21235-STCH-XX-ZZ-DR-A-0300-Proposed building - Section AA.dwg
21235-STCH-XX-ZZ-DR-A-0201-Proposed building - East elevation.dwg

Key: Existing Buildings
Proposed Scheme

All Heights in mm AOD

Project: Avonmouth House

Title: 3D View
Proposed Scheme 07/09/21

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	HE	NTS	Sep 21	P2747/09	03

POINT 2

APPENDIX C - Assessment Methodology

1.1 To determine whether a neighbouring existing building may be adversely affected, the initial test provided by the BRE is to establish if any part of the proposal subtends an angle of more than 25˚ from the lowest window serving the existing building. If this is the case then there may be an adverse effect, and more detailed calculations are required to quantify the extent of any impact.

1.2 The BRE guidelines provide two principal measures of daylight for assessing the impact on properties neighbouring a site, namely Vertical Sky Component (VSC) and No-SkyLine (NSL).

1.3 In relation to sunlight effects on windows and rooms within neighbouring properties, the BRE provide the Annual Probable Sunlight Hours (APSH) methodology. In relation to sunlight amenity to gardens and amenity spaces, the BRE provide quantitative overshadowing guidance that relates to the proportion of shading on March 21st.

1.4 **Vertical Sky Component (VSC)** – VSC is a measure of the direct skylight reaching a point from an overcast sky. It is the ratio of the illuminance at a point on a given vertical plane to the illuminance at a point on a horizontal plane due to an unobstructed sky.

1.5 For existing buildings, the BRE guideline is based on the loss of VSC at a point at the centre of a window, on the outer plane of the wall.

1.6 The BRE guidelines state that if the VSC at the centre of a window is less than 27%, and it is less than 0.8 times its former value (i.e. the proportional reduction is greater than 20%), then the reduction in skylight will be noticeable, and the existing building may be adversely affected.

1.7 **No-Sky Line (NSL)** - NSL is a measure of the distribution of daylight within a room. It maps out the region within a room where light can penetrate directly from the sky, and therefore accounts for the size of and number of windows by simple geometry.

1.8 The BRE suggest that the area of the working plane within a room that can receive direct skylight should not be reduced to less than 0.8 times its former value (i.e. the proportional reduction in area should not be greater than 20%).

1.9 **Annual Probable Sunlight Hours (APSH) -** In relation to sunlight, the BRE recommends that the APSH received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter.

1.10 Where the proposed values fall short of these, and the absolute loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period (i.e. the proportional reductions should not be greater than 20%).

1.11 The BRE guidelines state that *'...all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block out too much sun'.*

1.12 The APSH figures are calculated for each window, and where a room is served by more than one window the contribution of each is accounted for in the overall figures for the room. The acceptability criteria are applied to overall room-based figures.

1.13 **Overshadowing** - Section 3.3 of the BRE guidelines describes the method of assessment of the availability of sunlight within garden/amenity spaces. This relates to the proportion of shading on March 21st.

1.14 The BRE criteria for gardens or amenity areas are as follows, *'It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity space should receive at least two hours of sunlight on 21 March. If as a result of a new development an existing garden or amenity space does not meet the above, and the area which can receive two hours of sunlight on 21 march is less than 0.8 times its former value, then the loss of amenity is likely to be noticeable.'*

APPENDIX D – Telford House: Tabular VSC, NSL Results, Window Maps and NSL Contour Plots

DAYLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

DAYLIGHT						
Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
TELFORD HOUSE						
R1/100	BEDROOM	W1/100	33.78	23.86	9.92	29.37
R5/100	KITCHEN	W5/100	16.82	9.59	7.23	42.98
R6/100	KITCHEN	W6/100	16.77	9.56	7.21	42.99
R10/100	BEDROOM	W10/100	16.09	9.79	6.30	39.15
R11/100	KITCHEN	W11/100	15.74	9.68	6.06	38.50
R12/100	BEDROOM	W12/100	7.93	7.69	0.24	3.03
R1/101	BEDROOM	W1/101	35.24	24.80	10.44	29.63
R5/101	KITCHEN	W5/101	18.01	10.01	8.00	44.42
R6/101	KITCHEN	W6/101	18.02	10.03	7.99	44.34
R10/101	BEDROOM	W10/101	17.65	10.56	7.09	40.17
R11/101	KITCHEN	W11/101	17.52	10.66	6.86	39.16
R12/101	BEDROOM	W12/101	9.09	8.70	0.39	4.29
R1/102	BEDROOM	W1/102	36.13	25.61	10.52	29.12
R5/102	KITCHEN	W5/102	19.19	10.83	8.36	43.56
R6/102	KITCHEN	W6/102	19.23	10.90	8.33	43.32
R10/102	BEDROOM	W10/102	19.01	11.61	7.40	38.93
R11/102	KITCHEN	W11/102	18.99	11.82	7.17	37.76
R12/102	BEDROOM	W12/102	10.12	9.62	0.50	4.94
R1/103	BEDROOM	W1/103	36.57	26.12	10.45	28.58
R5/103	KITCHEN	W5/103	19.89	11.41	8.48	42.63
R6/103	KITCHEN	W6/103	19.95	11.51	8.44	42.31
R10/103	BEDROOM	W10/103	19.78	12.30	7.48	37.82

DAYLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

DAYLIGHT

Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
R11/103	KITCHEN	W11/103	19.74	12.51	7.23	36.63
R12/103	BEDROOM	W12/103	10.69	10.12	0.57	5.33
R1/104	BEDROOM	W1/104	30.22	19.95	10.27	33.98
R5/104	KITCHEN	W5/104	26.57	17.21	9.36	35.23
R6/104	KITCHEN	W6/104	26.83	17.51	9.32	34.74
R10/104	BEDROOM	W10/104	26.71	18.42	8.29	31.04
R11/104	KITCHEN	W11/104	26.59	18.63	7.96	29.94
R12/104	BEDROOM	W12/104	14.89	14.05	0.84	5.64

DAYLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

Walkway Effects Removed

Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
TELFORD HOUSE						
R1/100	BEDROOM	W1/100	33.78	23.86	9.92	29.37
R5/100	KITCHEN	W5/100	33.22	23.99	9.23	27.78
R6/100	KITCHEN	W6/100	33.07	24.03	9.04	27.34
R10/100	BEDROOM	W10/100	32.54	24.22	8.32	25.57
R11/100	KITCHEN	W11/100	32.16	24.50	7.66	23.82
R12/100	BEDROOM	W12/100	20.53	19.17	1.36	6.62
R1/101	BEDROOM	W1/101	35.24	24.80	10.44	29.63
R5/101	KITCHEN	W5/101	34.91	25.01	9.90	28.36
R6/101	KITCHEN	W6/101	34.84	25.11	9.73	27.93
R10/101	BEDROOM	W10/101	34.60	25.54	9.06	26.18
R11/101	KITCHEN	W11/101	34.37	25.97	8.40	24.44
R12/101	BEDROOM	W12/101	22.08	20.63	1.45	6.57
R1/102	BEDROOM	W1/102	36.13	25.61	10.52	29.12
R5/102	KITCHEN	W5/102	35.86	25.91	9.95	27.75
R6/102	KITCHEN	W6/102	35.85	26.06	9.79	27.31
R10/102	BEDROOM	W10/102	35.77	26.64	9.13	25.52
R11/102	KITCHEN	W11/102	35.61	27.13	8.48	23.81
R12/102	BEDROOM	W12/102	22.99	21.55	1.44	6.26
R1/103	BEDROOM	W1/103	36.57	26.12	10.45	28.58
R5/103	KITCHEN	W5/103	36.70	26.84	9.86	26.87
R6/103	KITCHEN	W6/103	36.77	27.07	9.70	26.38
R10/103	BEDROOM	W10/103	36.73	27.71	9.02	24.56

DAYLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

Walkway Effects Removed

Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
R11/103	KITCHEN	W11/103	36.60	28.23	8.37	22.87
R12/103	BEDROOM	W12/103	23.81	22.41	1.40	5.88
R1/104	BEDROOM	W1/104	30.22	19.95	10.27	33.98
R5/104	KITCHEN	W5/104	37.68	28.04	9.64	25.58
R6/104	KITCHEN	W6/104	37.71	28.10	9.61	25.48
R10/104	BEDROOM	W10/104	37.63	28.84	8.79	23.36
R11/104	KITCHEN	W11/104	37.51	29.36	8.15	21.73
R12/104	BEDROOM	W12/104	24.64	23.28	1.36	5.52

NSL ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

NSL						
Room	Room Use	Whole Room sq ft	Existing sq ft	Proposed sq ft	Loss sq ft	%Loss
TELFORD HOUSE						
R1/100	BEDROOM	118.3	112.5	75.0	37.5	33.3
R5/100	KITCHEN	51.4	39.7	21.2	18.6	46.9
R6/100	KITCHEN	50.7	39.7	18.3	21.4	53.9
R10/100	BEDROOM	86.2	76.5	73.3	3.3	4.3
R11/100	KITCHEN	86.9	75.1	67.5	7.6	10.1
R12/100	BEDROOM	123.5	96.6	95.8	0.8	0.8
R1/101	BEDROOM	118.3	112.5	75.6	36.9	32.8
R5/101	KITCHEN	51.4	39.7	21.2	18.6	46.9
R6/101	KITCHEN	50.7	39.7	18.3	21.4	53.9
R10/101	BEDROOM	86.2	76.5	73.3	3.3	4.3
R11/101	KITCHEN	86.9	76.4	68.8	7.6	9.9
R12/101	BEDROOM	123.5	101.3	100.2	1.1	1.1
R1/102	BEDROOM	118.3	112.5	77.2	35.3	31.4
R5/102	KITCHEN	51.4	39.7	21.7	18.0	45.3
R6/102	KITCHEN	50.7	39.7	18.6	21.1	53.1
R10/102	BEDROOM	86.2	76.5	73.3	3.3	4.3
R11/102	KITCHEN	86.9	76.5	69.1	7.5	9.8
R12/102	BEDROOM	123.5	102.0	100.9	1.1	1.1
R1/103	BEDROOM	118.3	112.5	79.4	33.2	29.5
R5/103	KITCHEN	51.4	39.7	22.8	17.0	42.8
R6/103	KITCHEN	50.7	39.7	19.6	20.1	50.6
R10/103	BEDROOM	86.2	76.5	73.3	3.3	4.3
R11/103	KITCHEN	86.9	76.5	69.8	6.7	8.8
R12/103	BEDROOM	123.5	102.4	101.3	1.1	1.1
R1/104	BEDROOM	118.3	112.5	78.0	34.5	30.7
R5/104	KITCHEN	51.4	40.8	26.9	13.9	34.1
R6/104	KITCHEN	50.7	40.8	25.1	15.6	38.2
R10/104	BEDROOM	86.2	78.4	75.4	3.1	4.0
R11/104	KITCHEN	86.9	77.5	73.9	3.6	4.6
R12/104	BEDROOM	123.5	103.0	102.2	0.7	0.7

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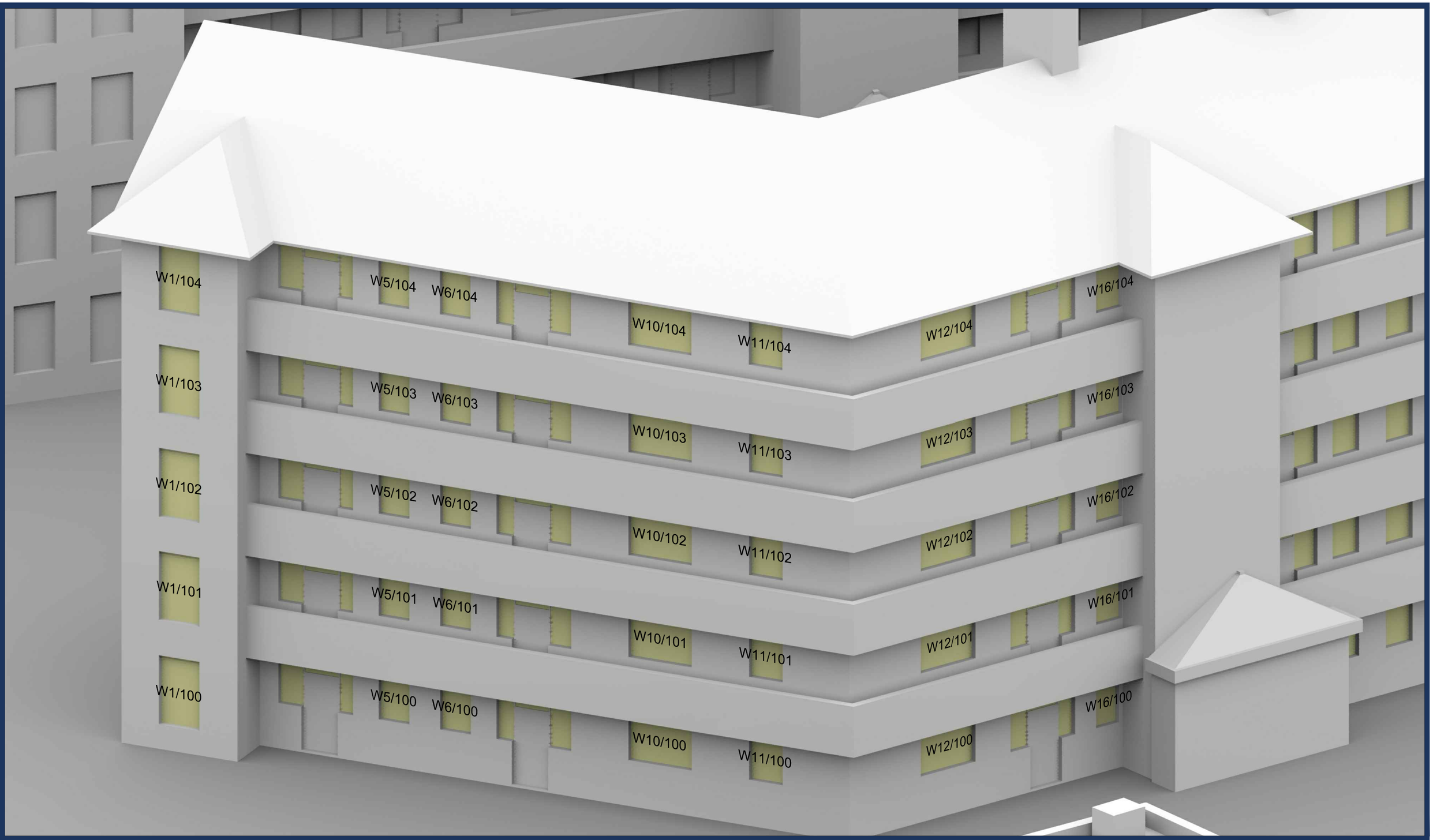

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21235-STCH-XX-ZZ-DR-A-0300-Proposed building - Section AA.dwg
21235-STCH-XX-ZZ-DR-A-0201-Proposed building - East elevation.dwg

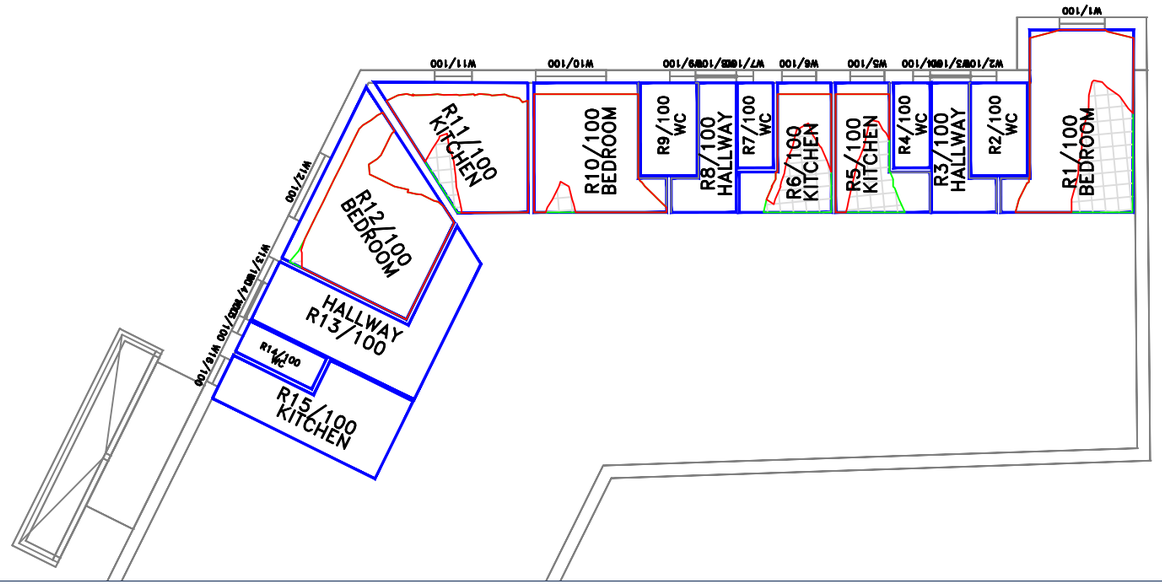
Key:

Project: Avonmouth House

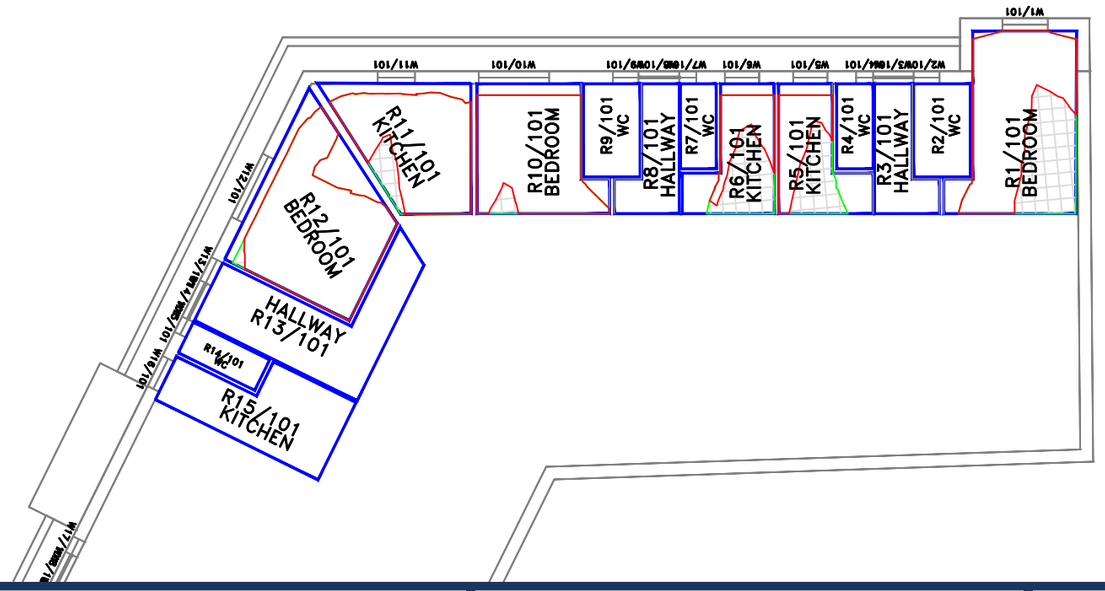
Title: Window Locations
Telford House

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	MC	NTS@A3	Sep 21	P2747/WM/02	04

POINT 2



Ground Floor



First Floor

Sources: LRM Survey Survices
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Stitch Architects
Proposed Scheme 3D Model (received 07/09/21)
210907-AvonmouthModel.skp
21235-STCH-XX-ZZ-DR-A-0200-0203.pdf
21235-STCH-SK-50-Geolocation.pdf

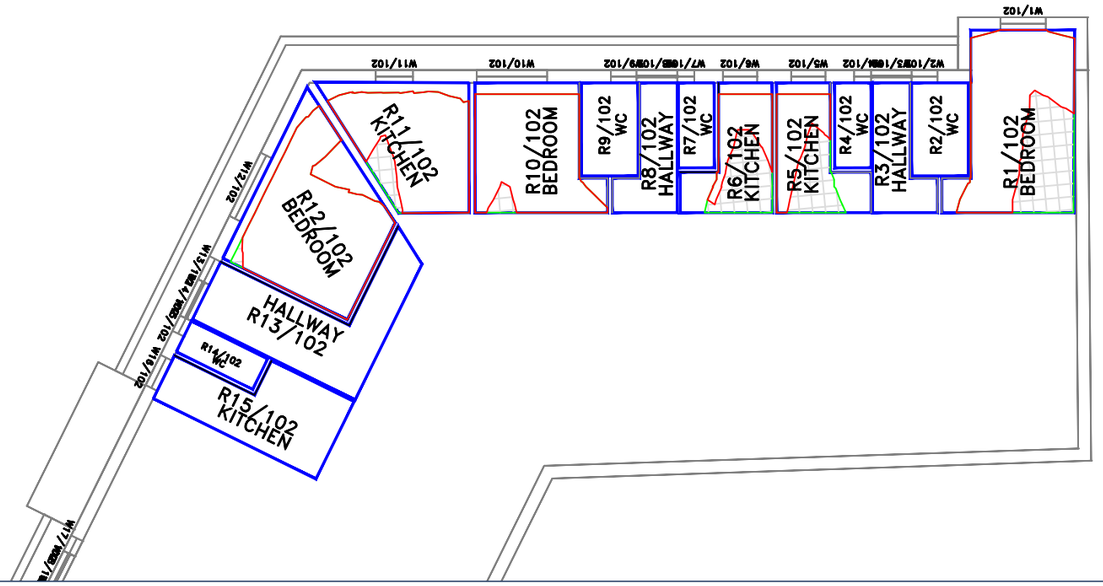
Key:
- Existing NSL Contour
- Proposed NSL Contour
- Region of Loss / Gain

Project: Avonmouth House

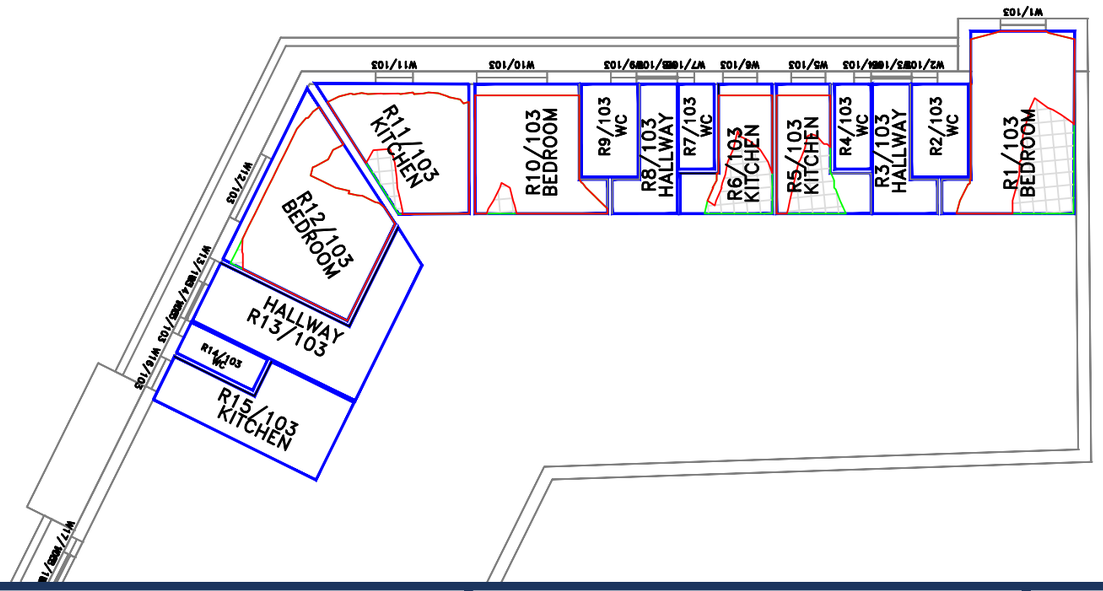
Title: Daylight & Sunlight Contours
Existing vs Proposed Scheme 07/09/21

Telford House

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	AG	1:150@A3	Nov 22	P2747/NSL/01	13



Second Floor



Third Floor

Sources: LRM Survey Survices
2D Survey (received 07/06/21)
Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

Stitch Architects
Proposed Scheme 3D Model (received 07/09/21)
210907-AvonmouthModel.skp
21235-STCH-XX-ZZ-DR-A-0200-0203.pdf
21235-STCH-SK-50-Geolocation.pdf

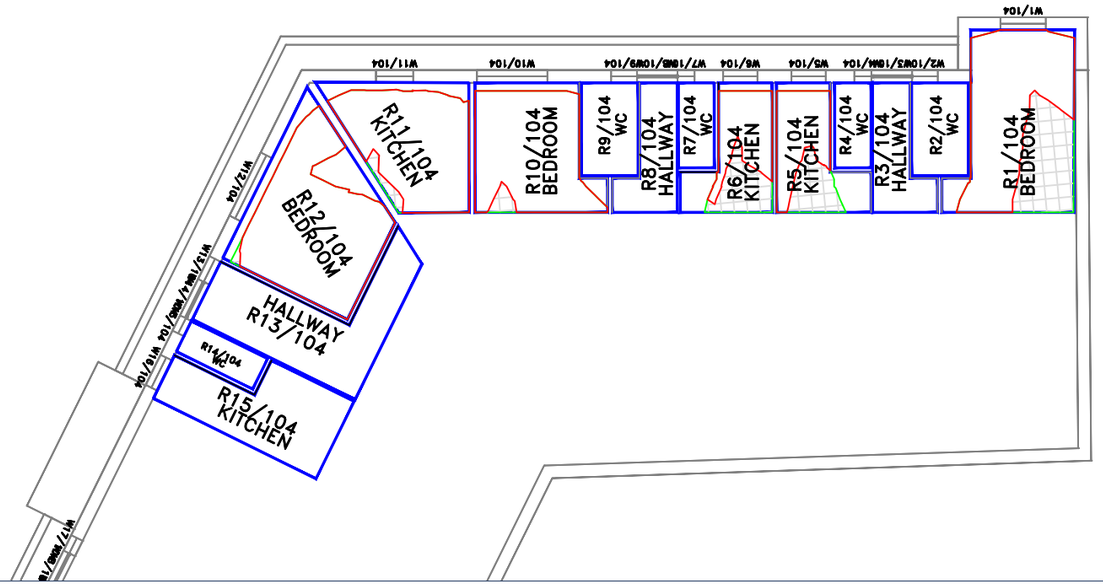
Key:
- Existing NSL Contour
- Proposed NSL Contour
- Region of Loss / Gain

Project: Avonmouth House

Title: Daylight & Sunlight Contours
Existing vs Proposed Scheme 07/09/21

Telford House

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	AG	1:150@A3	Nov 22	P2747/NSL/02	13



Fourth Floor

Sources: LRM Survey Survices
2D Survey (received 07/06/21)
Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

Stitch Architects
Proposed Scheme 3D Model (received 07/09/21)
210907-AvonmouthModel.skp
21235-STCH-XX-ZZ-DR-A-0200-0203.pdf
21235-STCH-SK-50-Geolocation.pdf

Key:
Existing NSL Contour
Proposed NSL Contour
Region of Loss / Gain

Project: Avonmouth House

Title: Daylight & Sunlight Contours
Existing vs Proposed Scheme 07/09/21

Telford House

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	AG	1:150@A3	Nov 22	P2747/NSL/03	13

APPENDIX E – Stephenson House: Tabular VSC, NSL Results, Window Maps and NSL Contour Plots

DAYLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

DAYLIGHT						
Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
STEPHENSON HOUSE						
R1/120	BEDROOM	W46/120	15.26	15.01	0.25	1.64
R2/120	BEDROOM	W1/120	10.76	6.29	4.47	41.54
R5/120	KITCHEN	W4/120	9.64	5.31	4.33	44.92
R9/120	BEDROOM	W8/120	7.57	3.69	3.88	51.25
R10/120	BEDROOM	W9/120	23.17	19.06	4.11	17.74
R11/120	BEDROOM	W10/120	22.56	18.85	3.71	16.45
R14/120	KITCHEN	W14/120	4.75	2.77	1.98	41.68
R15/120	KITCHEN	W15/120	4.97	3.29	1.68	33.80
R18/120	BEDROOM	W19/120	4.63	3.56	1.07	23.11
R19/120	KITCHEN	W20/120	4.50	3.65	0.85	18.89
R1/121	BEDROOM	W46/121	16.08	15.79	0.29	1.80
R2/121	BEDROOM	W1/121	11.61	7.06	4.55	39.19
R5/121	KITCHEN	W4/121	10.69	6.29	4.40	41.16
R9/121	BEDROOM	W8/121	8.61	4.66	3.95	45.88
R10/121	BEDROOM	W9/121	25.11	21.01	4.10	16.33
R11/121	BEDROOM	W10/121	24.60	20.88	3.72	15.12
R14/121	KITCHEN	W14/121	6.35	4.18	2.17	34.17
R15/121	KITCHEN	W15/121	6.57	4.66	1.91	29.07
R18/121	BEDROOM	W19/121	6.21	4.88	1.33	21.42
R19/121	KITCHEN	W20/121	6.04	4.92	1.12	18.54
R1/122	BEDROOM	W46/122	16.58	16.26	0.32	1.93
R2/122	BEDROOM	W1/122	12.35	7.78	4.57	37.00

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cur: \\p2server\Projects\2700\Avonmouth House.2747\Appeal\Appendices\Appendix E - Stephenson House\APR070921.xlsb

DAYLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

DAYLIGHT

Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
R5/122	KITCHEN	W4/122	11.60	7.19	4.41	38.02
R9/122	BEDROOM	W8/122	9.56	5.60	3.96	41.42
R10/122	BEDROOM	W9/122	27.14	23.07	4.07	15.00
R11/122	BEDROOM	W10/122	26.68	22.96	3.72	13.94
R14/122	KITCHEN	W14/122	7.80	5.48	2.32	29.74
R15/122	KITCHEN	W15/122	7.73	5.68	2.05	26.52
R18/122	BEDROOM	W19/122	7.39	5.87	1.52	20.57
R19/122	KITCHEN	W20/122	7.22	5.88	1.34	18.56
R1/123	BEDROOM	W46/123	17.74	17.38	0.36	2.03
R2/123	BEDROOM	W1/123	13.10	8.54	4.56	34.81
R5/123	KITCHEN	W4/123	12.99	8.54	4.45	34.26
R9/123	BEDROOM	W8/123	10.63	6.65	3.98	37.44
R10/123	BEDROOM	W9/123	28.56	24.49	4.07	14.25
R11/123	BEDROOM	W10/123	28.06	24.30	3.76	13.40
R14/123	KITCHEN	W14/123	9.32	6.78	2.54	27.25
R15/123	KITCHEN	W15/123	9.64	7.27	2.37	24.59
R18/123	BEDROOM	W19/123	9.32	7.42	1.90	20.39
R19/123	KITCHEN	W20/123	9.13	7.40	1.73	18.95
R1/124	BEDROOM	W46/124	26.42	25.82	0.60	2.27
R2/124	BEDROOM	W1/124	20.11	15.52	4.59	22.82
R5/124	KITCHEN	W4/124	19.67	15.31	4.36	22.17
R9/124	BEDROOM	W8/124	17.84	13.92	3.92	21.97

DAYLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

DAYLIGHT

Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
R10/124	BEDROOM	W9/124	22.46	18.41	4.05	18.03
R11/124	BEDROOM	W10/124	21.99	18.16	3.83	17.42
R14/124	KITCHEN	W14/124	16.44	13.58	2.86	17.40
R15/124	KITCHEN	W15/124	16.84	14.11	2.73	16.21
R18/124	BEDROOM	W19/124	16.43	14.12	2.31	14.06
R19/124	KITCHEN	W20/124	16.02	13.90	2.12	13.23

DAYLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

Walkway Effects Removed

Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
STEPHENSON HOUSE						
R1/120	BEDROOM	W46/120	35.02	33.96	1.06	3.03
R2/120	BEDROOM	W1/120	28.61	23.16	5.45	19.05
R5/120	KITCHEN	W4/120	25.88	20.88	5.00	19.32
R9/120	BEDROOM	W8/120	20.05	15.52	4.53	22.59
R10/120	BEDROOM	W9/120	23.17	19.06	4.11	17.74
R11/120	BEDROOM	W10/120	22.56	18.85	3.71	16.45
R14/120	KITCHEN	W14/120	21.02	18.50	2.52	11.99
R15/120	KITCHEN	W15/120	21.58	19.38	2.20	10.19
R18/120	BEDROOM	W19/120	21.35	19.88	1.47	6.89
R19/120	KITCHEN	W20/120	20.31	19.03	1.28	6.30
R1/121	BEDROOM	W46/121	35.77	34.72	1.05	2.94
R2/121	BEDROOM	W1/121	29.77	24.42	5.35	17.97
R5/121	KITCHEN	W4/121	27.32	22.40	4.92	18.01
R9/121	BEDROOM	W8/121	21.25	16.82	4.43	20.85
R10/121	BEDROOM	W9/121	25.11	21.01	4.10	16.33
R11/121	BEDROOM	W10/121	24.60	20.88	3.72	15.12
R14/121	KITCHEN	W14/121	22.97	20.36	2.61	11.36
R15/121	KITCHEN	W15/121	23.51	21.18	2.33	9.91
R18/121	BEDROOM	W19/121	23.21	21.59	1.62	6.98
R19/121	KITCHEN	W20/121	22.15	20.70	1.45	6.55
R1/122	BEDROOM	W46/122	36.53	35.50	1.03	2.82
R2/122	BEDROOM	W1/122	30.95	25.73	5.22	16.87

DAYLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

Walkway Effects Removed

Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
R5/122	KITCHEN	W4/122	29.05	24.25	4.80	16.52
R9/122	BEDROOM	W8/122	22.61	18.29	4.32	19.11
R10/122	BEDROOM	W9/122	27.14	23.07	4.07	15.00
R11/122	BEDROOM	W10/122	26.68	22.96	3.72	13.94
R14/122	KITCHEN	W14/122	24.84	22.17	2.67	10.75
R15/122	KITCHEN	W15/122	25.46	23.01	2.45	9.62
R18/122	BEDROOM	W19/122	25.12	23.33	1.79	7.13
R19/122	KITCHEN	W20/122	23.98	22.33	1.65	6.88
R1/123	BEDROOM	W46/123	37.41	36.41	1.00	2.67
R2/123	BEDROOM	W1/123	32.16	27.11	5.05	15.70
R5/123	KITCHEN	W4/123	30.78	26.14	4.64	15.07
R9/123	BEDROOM	W8/123	24.67	20.49	4.18	16.94
R10/123	BEDROOM	W9/123	28.56	24.49	4.07	14.25
R11/123	BEDROOM	W10/123	28.06	24.30	3.76	13.40
R14/123	KITCHEN	W14/123	27.07	24.26	2.81	10.38
R15/123	KITCHEN	W15/123	27.61	24.99	2.62	9.49
R18/123	BEDROOM	W19/123	27.18	25.14	2.04	7.51
R19/123	KITCHEN	W20/123	25.94	24.02	1.92	7.40
R1/124	BEDROOM	W46/124	38.50	37.53	0.97	2.52
R2/124	BEDROOM	W1/124	33.27	28.44	4.83	14.52
R5/124	KITCHEN	W4/124	32.49	28.06	4.43	13.63
R9/124	BEDROOM	W8/124	30.31	26.33	3.98	13.13

DAYLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

Walkway Effects Removed

Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
R10/124	BEDROOM	W9/124	22.46	18.41	4.05	18.03
R11/124	BEDROOM	W10/124	21.99	18.16	3.83	17.42
R14/124	KITCHEN	W14/124	29.82	26.82	3.00	10.06
R15/124	KITCHEN	W15/124	29.94	27.10	2.84	9.49
R18/124	BEDROOM	W19/124	29.54	27.25	2.29	7.75
R19/124	KITCHEN	W20/124	28.76	26.60	2.16	7.51

NSL ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

NSL

Room	Room Use	Whole Room sq ft	Existing sq ft	Proposed sq ft	Loss sq ft	%Loss
STEPHENSON HOUSE						
R1/120	BEDROOM	107.2	97.2	96.8	0.4	0.4
R2/120	BEDROOM	99.1	86.8	86.5	0.3	0.3
R5/120	KITCHEN	57.8	44.9	36.6	8.3	18.5
R9/120	BEDROOM	101.7	70.7	70.7	0.0	0.0
R10/120	BEDROOM	85.0	64.4	60.0	4.4	6.8
R11/120	BEDROOM	85.0	71.6	61.6	10.1	14.1
R14/120	KITCHEN	79.1	29.3	29.3	0.0	0.0
R15/120	KITCHEN	79.1	29.6	29.6	0.0	0.0
R18/120	BEDROOM	137.7	60.6	60.6	0.0	0.0
R19/120	KITCHEN	79.1	25.8	25.8	0.0	0.0
R1/121	BEDROOM	107.2	97.2	96.8	0.4	0.4
R2/121	BEDROOM	99.1	86.8	86.6	0.2	0.2
R5/121	KITCHEN	57.8	45.0	37.7	7.3	16.2
R9/121	BEDROOM	101.7	77.1	77.1	0.0	0.0
R10/121	BEDROOM	85.0	80.0	79.6	0.4	0.5
R11/121	BEDROOM	85.0	81.8	78.2	3.6	4.4
R14/121	KITCHEN	79.1	44.4	44.4	0.0	0.0
R15/121	KITCHEN	79.1	44.3	44.3	0.0	0.0
R18/121	BEDROOM	137.7	92.9	92.9	0.0	0.0
R19/121	KITCHEN	79.1	41.8	41.8	0.0	0.0
R1/122	BEDROOM	107.2	97.2	96.8	0.4	0.4
R2/122	BEDROOM	99.1	86.8	86.8	0.0	0.0
R5/122	KITCHEN	57.8	45.0	38.6	6.4	14.2
R9/122	BEDROOM	101.7	77.1	77.1	0.0	0.0
R10/122	BEDROOM	85.0	81.6	81.6	0.0	0.0
R11/122	BEDROOM	85.0	83.1	82.3	0.8	1.0
R14/122	KITCHEN	79.1	58.9	58.9	0.0	0.0
R15/122	KITCHEN	79.1	61.7	61.7	0.0	0.0
R18/122	BEDROOM	137.7	124.7	124.7	0.0	0.0
R19/122	KITCHEN	79.1	61.7	61.7	0.0	0.0
R1/123	BEDROOM	107.2	97.2	96.8	0.4	0.4
R2/123	BEDROOM	99.1	86.8	86.8	0.0	0.0
R5/123	KITCHEN	57.8	45.1	38.9	6.2	13.7
R9/123	BEDROOM	101.7	77.2	77.2	0.0	0.0
R10/123	BEDROOM	85.0	81.6	81.6	0.0	0.0
R11/123	BEDROOM	85.0	83.1	82.5	0.6	0.7
R14/123	KITCHEN	79.1	57.7	57.7	0.0	0.0
R15/123	KITCHEN	79.1	63.4	63.4	0.0	0.0
R18/123	BEDROOM	137.7	125.9	125.9	0.0	0.0
R19/123	KITCHEN	79.1	61.8	61.8	0.0	0.0
R1/124	BEDROOM	107.2	100.4	100.4	0.0	0.0
R2/124	BEDROOM	99.1	89.1	89.1	0.0	0.0
R5/124	KITCHEN	57.8	45.1	39.1	5.9	13.1

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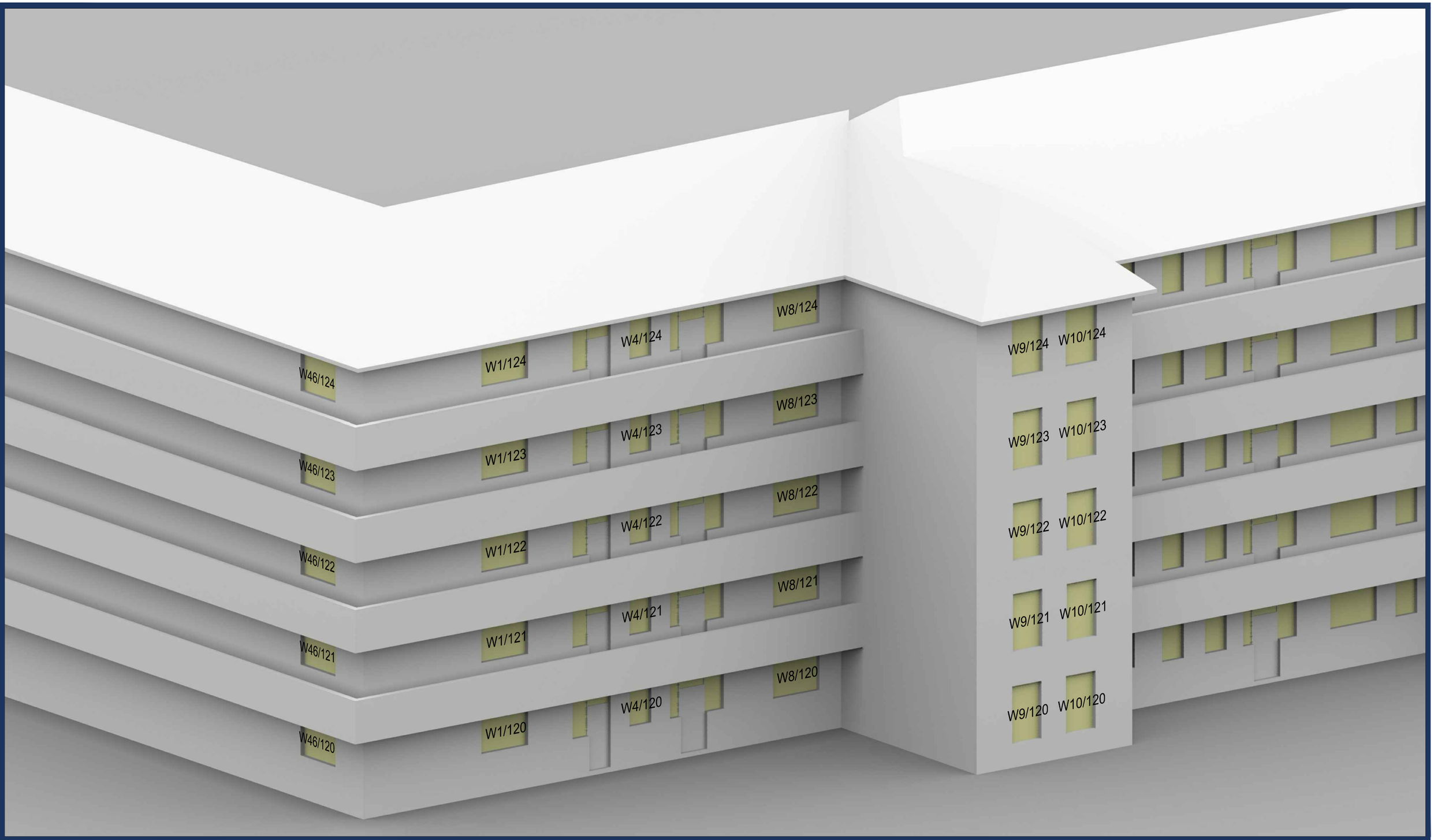
NSL ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

NSL

Room	Room Use	Whole Room sq ft	Existing sq ft	Proposed sq ft	Loss sq ft	%Loss
R9/124	BEDROOM	101.7	90.5	90.5	0.0	0.0
R10/124	BEDROOM	85.0	81.3	81.3	0.0	0.0
R11/124	BEDROOM	85.0	83.1	82.4	0.7	0.8
R14/124	KITCHEN	79.1	59.0	59.0	0.0	0.0
R15/124	KITCHEN	79.1	63.4	63.4	0.0	0.0
R18/124	BEDROOM	137.7	128.9	128.9	0.0	0.0
R19/124	KITCHEN	79.1	62.2	62.2	0.0	0.0



Sources: LRM Survey Services
2D Survey (received 07/06/21)
Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

Stitch Architects
Proposed Scheme 3D Model (received 13/07/21)
210712-Massing.skp
Proposed Scheme 3D Model (received 07/09/21)
210907-AvonmouthModel.skp
21235-STCH-XX-ZZ-DR-A-0200-0203.pdf
21235-STCH-SK-50-Geolocation.pdf
Proposed Scheme 2D Data (received 09/09/21)
21235-STCH-XX-02-DR-A-0103-Level 02.dwg
21235-STCH-XX-ZZ-DR-A-0300-Proposed building - Section AA.dwg
21235-STCH-XX-ZZ-DR-A-0201-Proposed building - East elevation.dwg

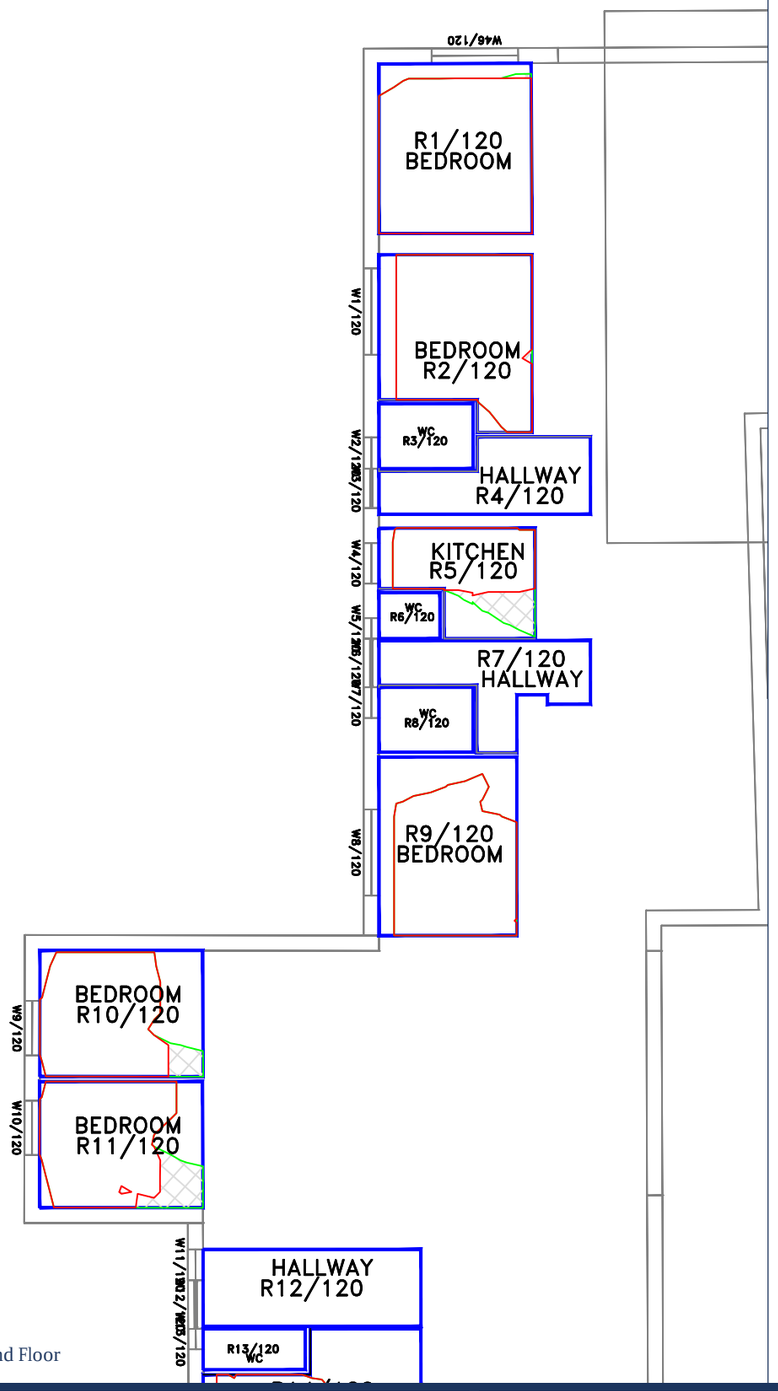
Key:

Project: Avonmouth House

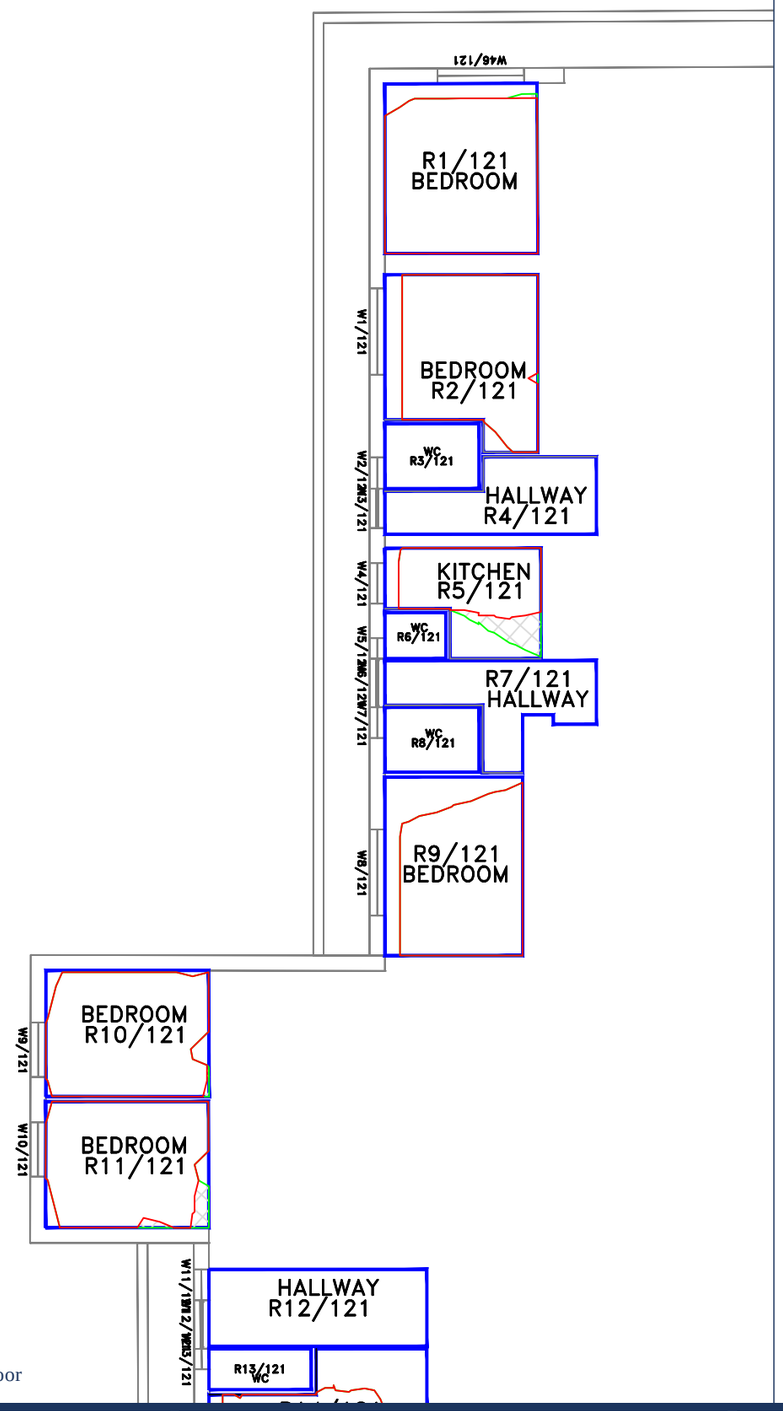
Title: Window Locations
Stephenson House

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	MC	NTS@A3	Sep 21	P2747/WM/04	04

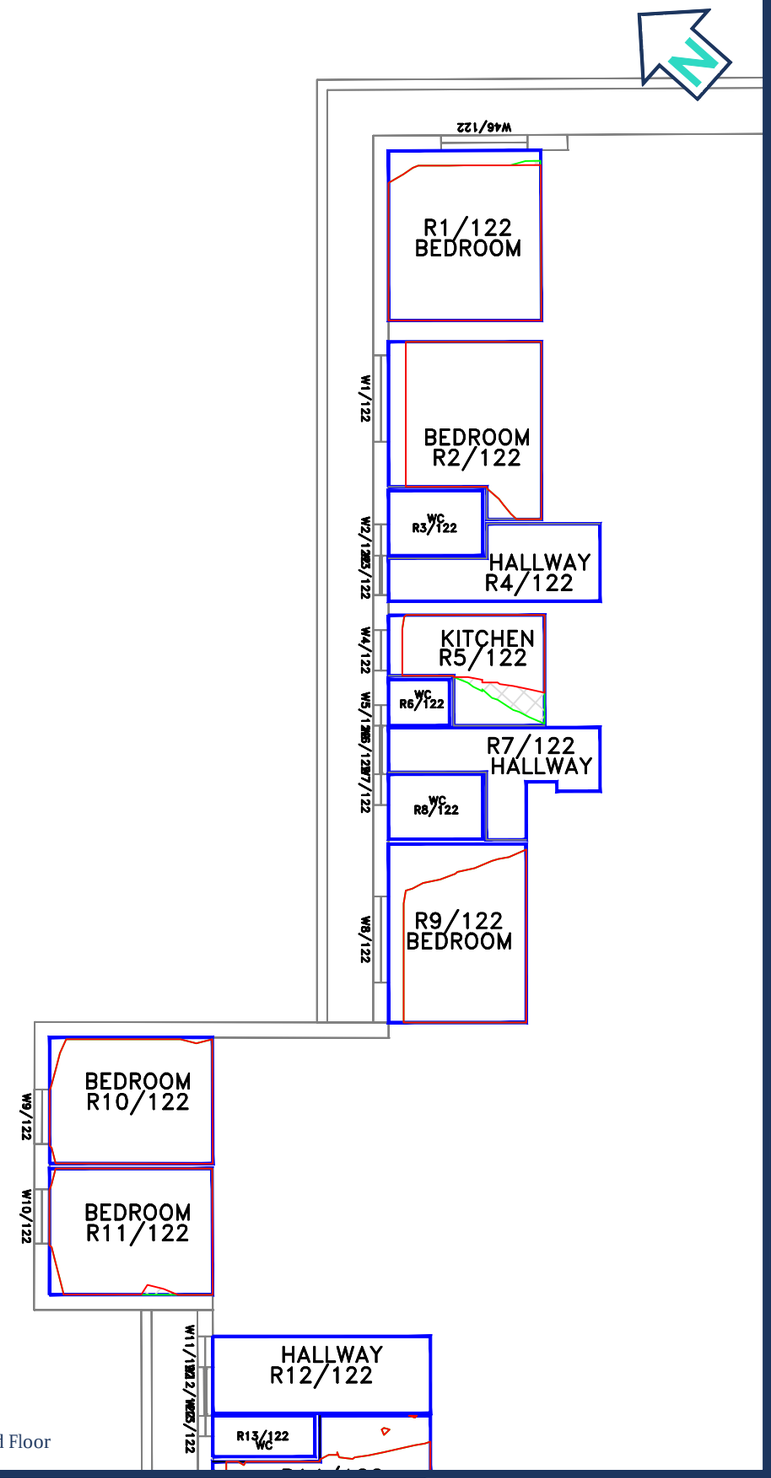
POINT 2



Ground Floor



First Floor



Second Floor

Sources: LRM Survey Services
2D Survey (received 07/06/21)
Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

Stitch Architects
Proposed Scheme 3D Model (received 07/09/21)
210907-AvonmouthModel.skp
21235-STCH-XX-ZZ-DR-A-0200-0203.pdf
21235-STCH-SK-50-Geolocation.pdf

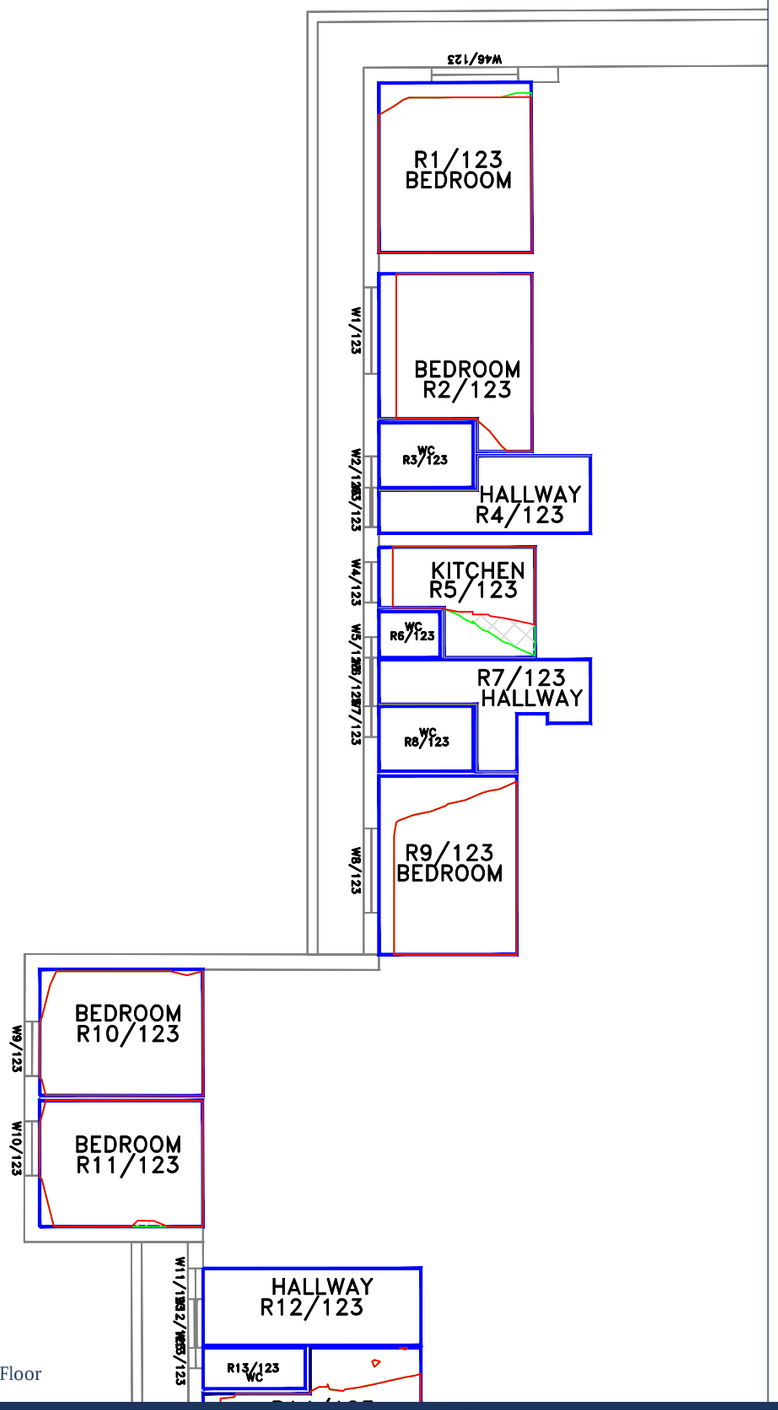
Key:
- Existing NSL Contour
- Proposed NSL Contour
- Region of Loss / Gain

Project: Avonmouth House

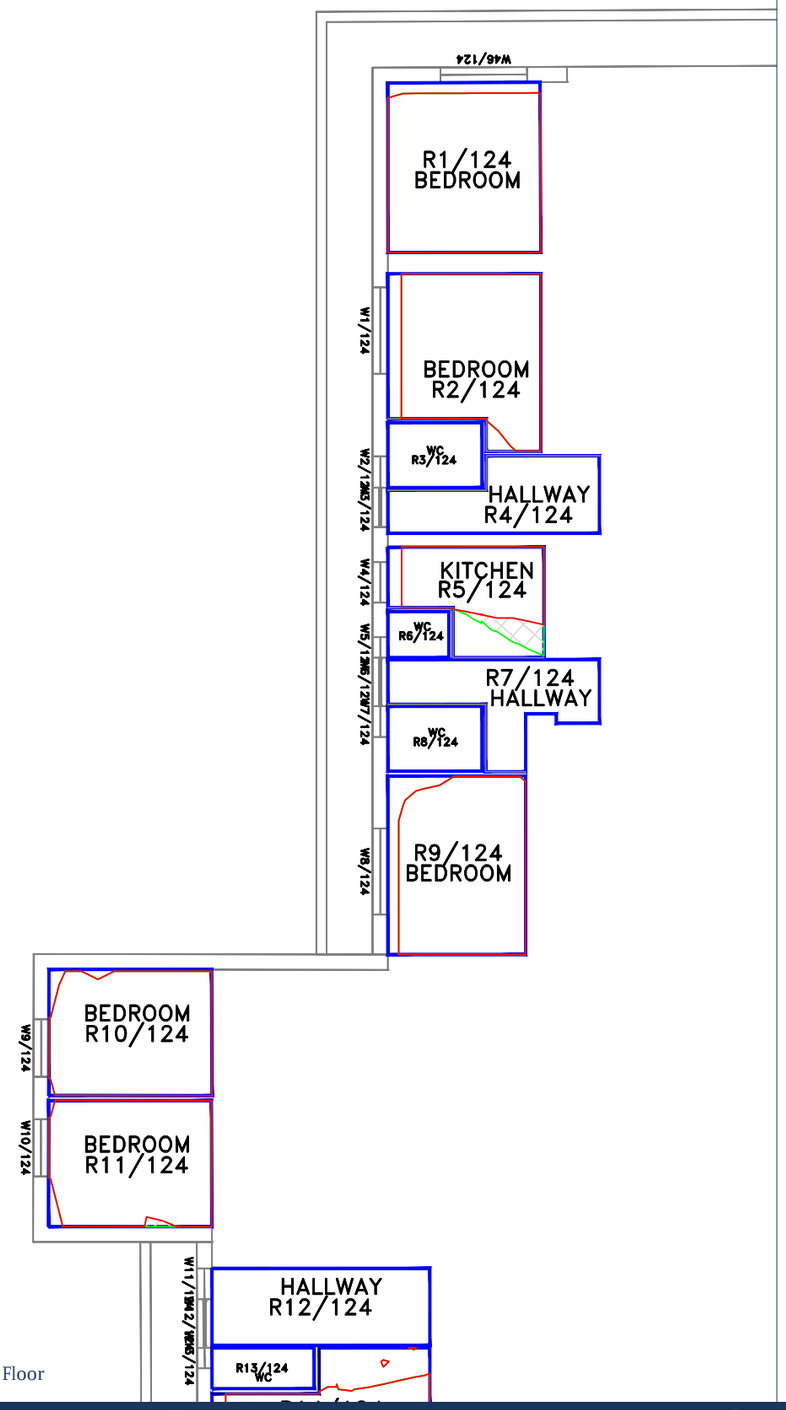
Title: Daylight & Sunlight Contours
Existing vs Proposed Scheme 07/09/21

Stephenson House

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	AG	1:125@A3	Nov 22	P2747/NSL/04	13



Third Floor



Fourth Floor

Sources: LRM Survey Services
2D Survey (received 07/06/21)
Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

Stitch Architects
Proposed Scheme 3D Model (received 07/09/21)
210907-AvonmouthModel.skp
21235-STCH-XX-ZZ-DR-A-0200-0203.pdf
21235-STCH-SK-50-Geolocation.pdf

Key:
- Existing NSL Contour
- Proposed NSL Contour
- Region of Loss / Gain

Project: Avonmouth House

Title: Daylight & Sunlight Contours
Existing vs Proposed Scheme 07/09/21

Stephenson House

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	AG	1:125@A3	Nov 22	P2747/NSL/05	13

APPENDIX F – 57-61 Newington Causeway: Tabular VSC, NSL, APSH Results, Window Maps and NSL Contour Plots

DAYLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

DAYLIGHT						
Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
57-61 NEWINGTON CAUSEWAY						
R1/261	BEDROOM	W1/261	5.81	4.62	1.19	20.48
R2/261	LKD	W2/261	8.64	4.41	4.23	48.96
R2/261	LKD	W3/261	30.81	30.81	0.00	0.00
R1/262	BEDROOM	W1/262	8.49	6.61	1.88	22.14
R2/262	LKD	W2/262	13.86	8.08	5.78	41.70
R2/262	LKD	W3/262	30.79	30.79	0.00	0.00
R1/263	BEDROOM	W1/263	13.34	10.69	2.65	19.87
R2/263	LKD	W2/263	23.86	17.40	6.46	27.07
R2/263	LKD	W3/263	36.54	36.54	0.00	0.00
R2/264	ASSUMED	W1/264	49.95	41.98	7.97	15.96

NSL ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

NSL						
Room	Room Use	Whole Room sq ft	Existing sq ft	Proposed sq ft	Loss sq ft	%Loss
57-61 NEWINGTON CAUSEWAY						
R1/261	BEDROOM	111.4	41.7	38.4	3.3	7.9
R2/261	LKD	365.9	336.4	321.5	14.8	4.4
R1/262	BEDROOM	111.4	44.4	40.0	4.4	9.9
R2/262	LKD	367.4	345.5	339.6	5.9	1.7
R1/263	BEDROOM	111.4	52.4	47.2	5.2	9.9
R2/263	LKD	367.4	351.1	345.1	6.1	1.7
R2/264	ASSUMED	135.7	105.7	96.4	9.4	8.9

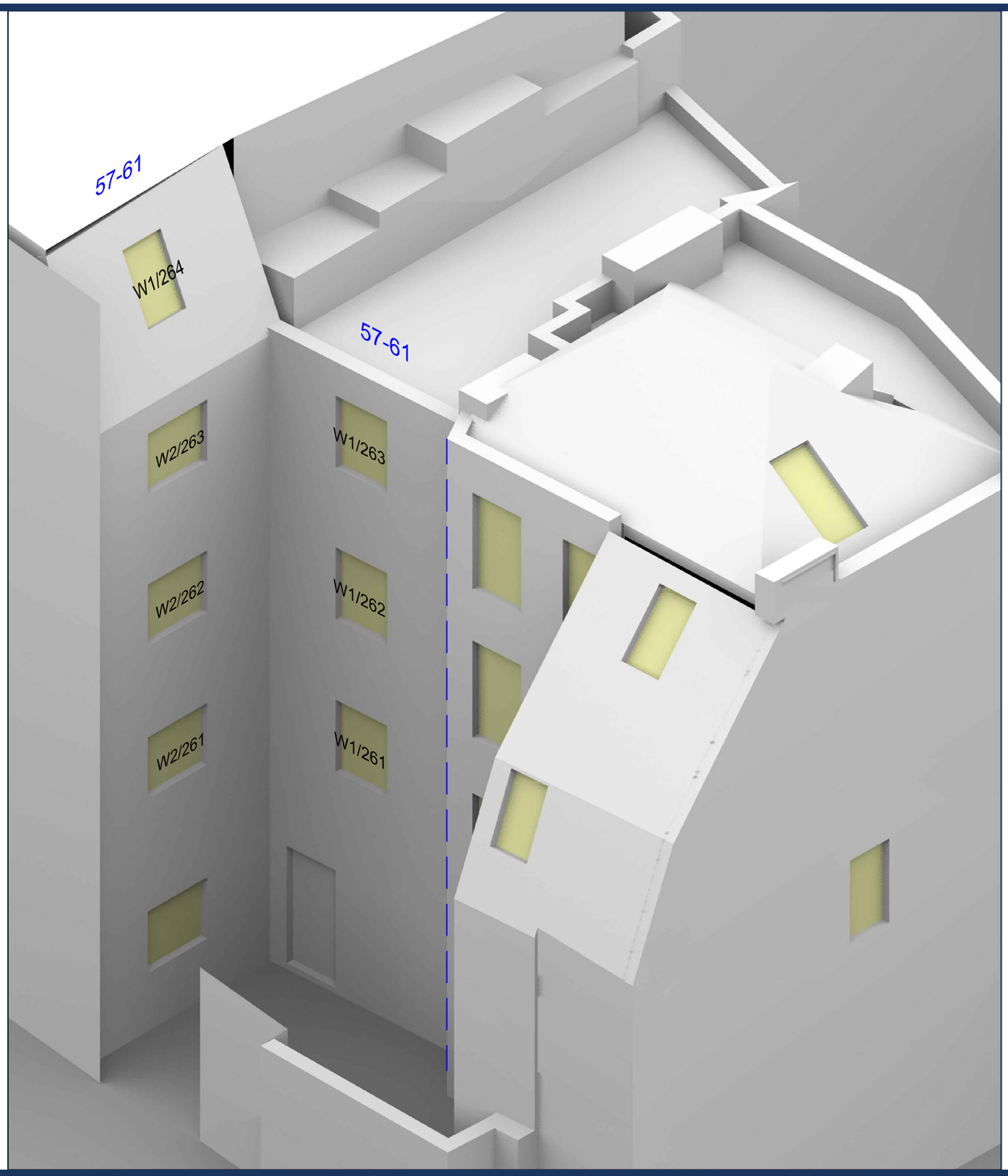
SUNLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

APSH

Room	Window	Room Use	Window				Winter %Loss	Annual %Loss	Room				Winter %Loss	Annual %Loss
			Existing		Proposed				Existing		Proposed			
			Winter APSH	Annual APSH	Winter APSH	Annual APSH			Winter APSH	Annual APSH	Winter APSH	Annual APSH		
57-61 NEWINGTON CAUSEWAY														
R1/261	W1/261	BEDROOM	4	13	3	9	25.0	30.8	4	13	3	9	25.0	30.8
R2/261	W2/261	LKD	2	13	0	3	100.0	76.9						
R2/261	W3/261	LKD	2	25	2	25	0.0	0.0	4	38	2	28	50.0	26.3
R1/262	W1/262	BEDROOM	6	18	4	13	33.3	27.8	6	18	4	13	33.3	27.8
R2/262	W2/262	LKD	4	18	0	6	100.0	66.7						
R2/262	W3/262	LKD	3	26	3	26	0.0	0.0	7	44	3	32	57.1	27.3
R1/263	W1/263	BEDROOM	10	30	4	18	60.0	40.0	10	30	4	18	60.0	40.0
R2/263	W2/263	LKD	6	31	1	19	83.3	38.7						
R2/263	W3/263	LKD	3	27	3	27	0.0	0.0	9	58	4	46	55.6	20.7
R2/264	W1/264	ASSUMED	9	44	3	32	66.7	27.3	9	44	3	32	66.7	27.3



Sources: LRM Survey Services
2D Survey (received 07/06/21)
Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

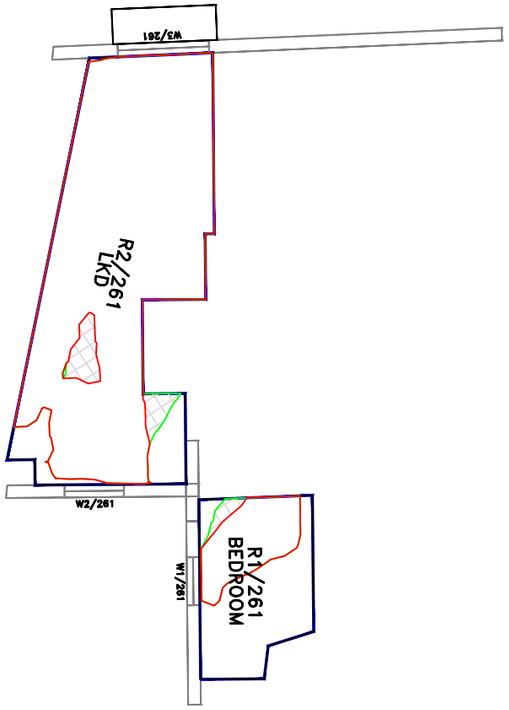
Stitch Architects
Proposed Scheme 3D Model (received 13/07/21)
210712-Massing.skp
Proposed Scheme 3D Model (received 07/09/21)
210907-AvonmouthModel.skp
21235-STCH-XX-ZZ-DR-A-0200-0203.pdf
21235-STCH-SK-50-Geolocation.pdf
Proposed Scheme 2D Data (received 09/09/21)
21235-STCH-XX-02-DR-A-0103-Level 02.dwg
21235-STCH-XX-ZZ-DR-A-0300-Proposed building - Section AA.dwg
21235-STCH-XX-ZZ-DR-A-0201-Proposed building - East elevation.dwg

Key:

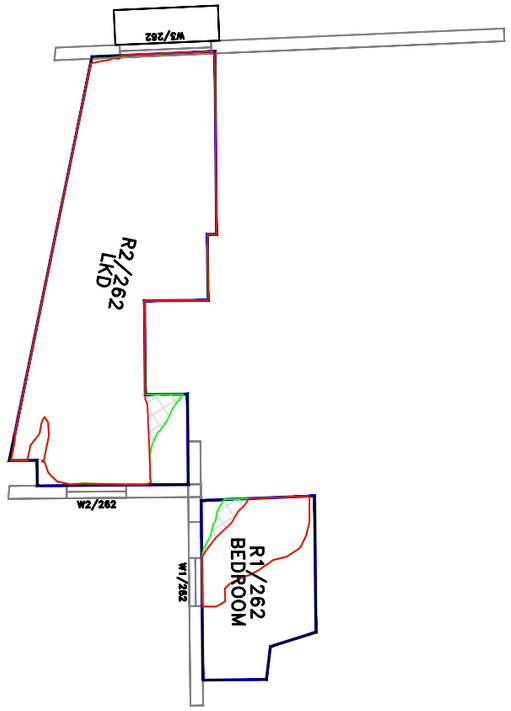
Project: Avonmouth House

Title: Window Locations
57-61 Newington Causeway

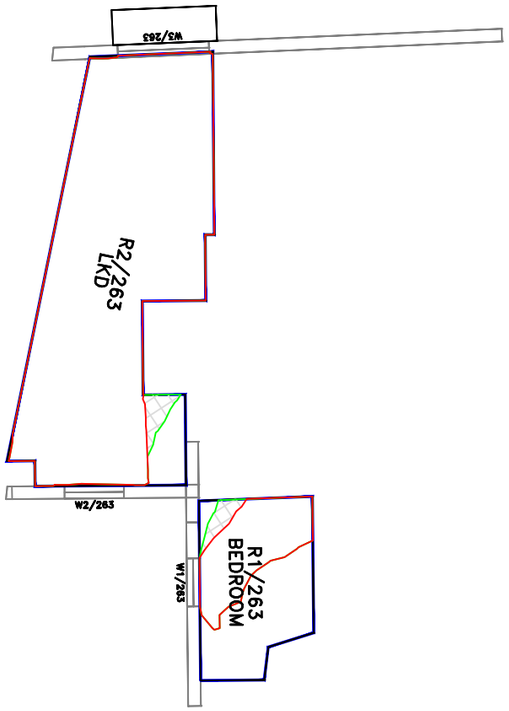
Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	MC	NTS@A3	Sep 21	P2747/WM/06	04



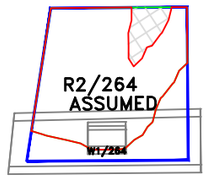
First Floor



Second Floor



Third Floor



Fourth Floor

Sources: LRM Survey Services
2D Survey (received 07/06/21)
Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

Stitch Architects
Proposed Scheme 3D Model (received 07/09/21)
210907-AvonmouthModel.skp
21235-STCH-XX-ZZ-DR-A-0200-0203.pdf
21235-STCH-SK-50-Geolocation.pdf

Key:
- Existing NSL Contour
- Proposed NSL Contour
- Region of Loss / Gain

Project: Avonmouth House

Title: Daylight & Sunlight Contours
Existing vs Proposed Scheme 07/09/21

57-61 Newington Causeway

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	AG	1:150@A3	Nov 22	P2747/NSL/06	13

APPENDIX G – 2 Avonmouth Street: Tabular VSC, NSL, APSH Results, Window Maps, NSL Contour Plots and BRE Overshadowing Assessment (2 hour sunlight test).

DAYLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

DAYLIGHT						
Room	Room Use	Window	Existing VSC	Proposed VSC	Loss	%Loss
2 AVONMOUTH STREET						
R1/271	ASSUMED	W1/271	3.92	3.92	0.00	0.00
R1/271	ASSUMED	W2/271	6.92	6.92	0.00	0.00
R1/272	ASSUMED	W1/272	6.29	6.29	0.00	0.00
R1/272	ASSUMED	W2/272	11.28	10.61	0.67	5.94
R1/273	ASSUMED	W1/273	17.79	14.41	3.38	19.00
R1/273	ASSUMED	W2/273	14.93	14.91	0.02	0.13
R1/281	ASSUMED	W1/281	32.88	23.57	9.31	28.32
R1/282	ASSUMED	W1/282	31.70	26.01	5.69	17.95
R1/283	ASSUMED	W1/283	56.98	48.77	8.21	14.41
R1/283	ASSUMED	W2/283	81.96	70.71	11.25	13.73

NSL ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

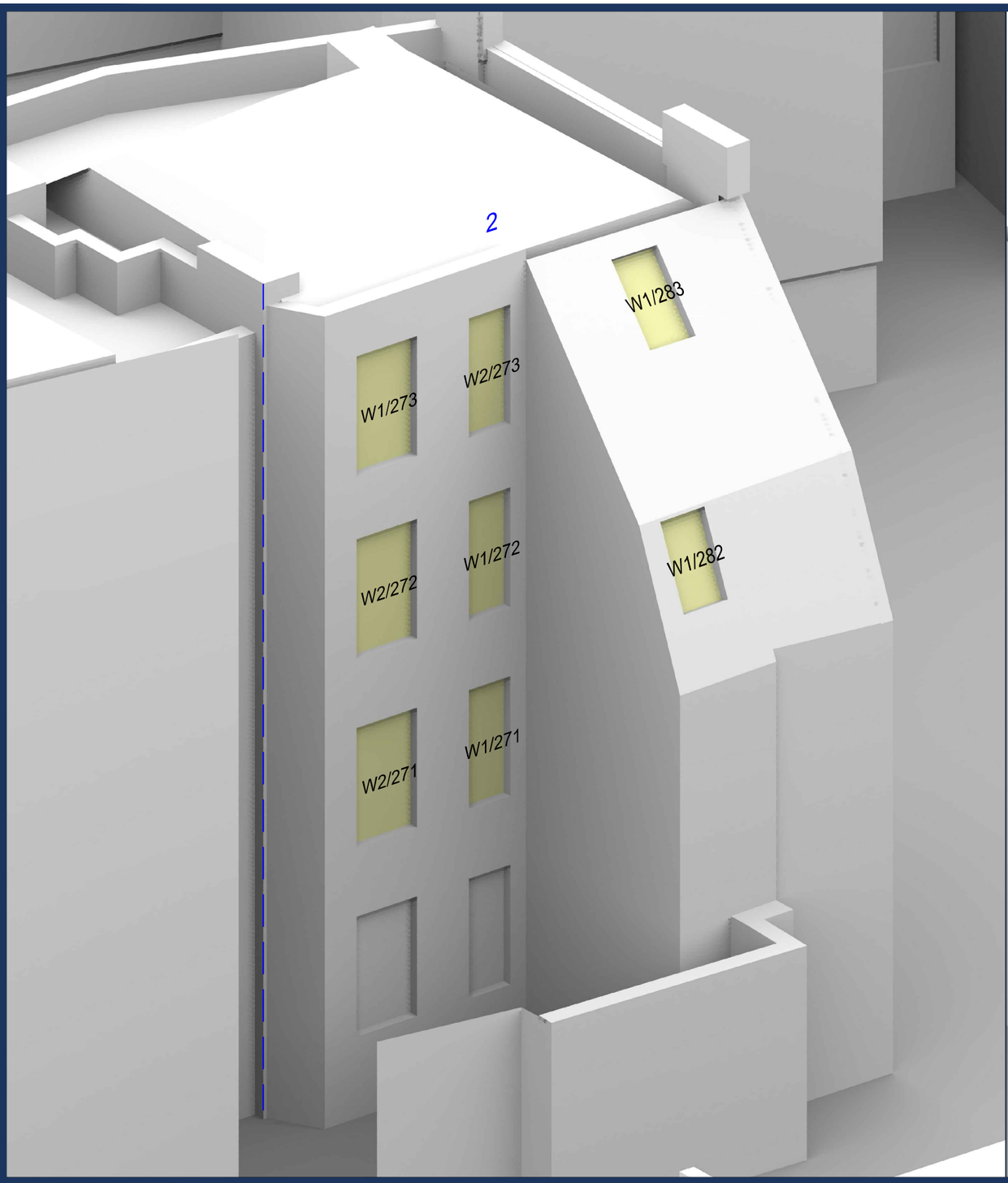
NSL						
Room	Room Use	Whole Room sq ft	Existing sq ft	Proposed sq ft	Loss sq ft	%Loss
2 AVONMOUTH STREET						
R1/271	ASSUMED	132.8	56.0	56.0	0.0	0.0
R1/272	ASSUMED	132.8	94.7	94.6	0.1	0.1
R1/273	ASSUMED	132.8	119.9	119.7	0.1	0.1
R1/281	ASSUMED	70.9	68.4	57.6	10.7	15.6
R1/282	ASSUMED	125.1	27.6	27.6	0.0	0.0
R1/283	ASSUMED	173.3	157.5	157.5	0.0	0.0

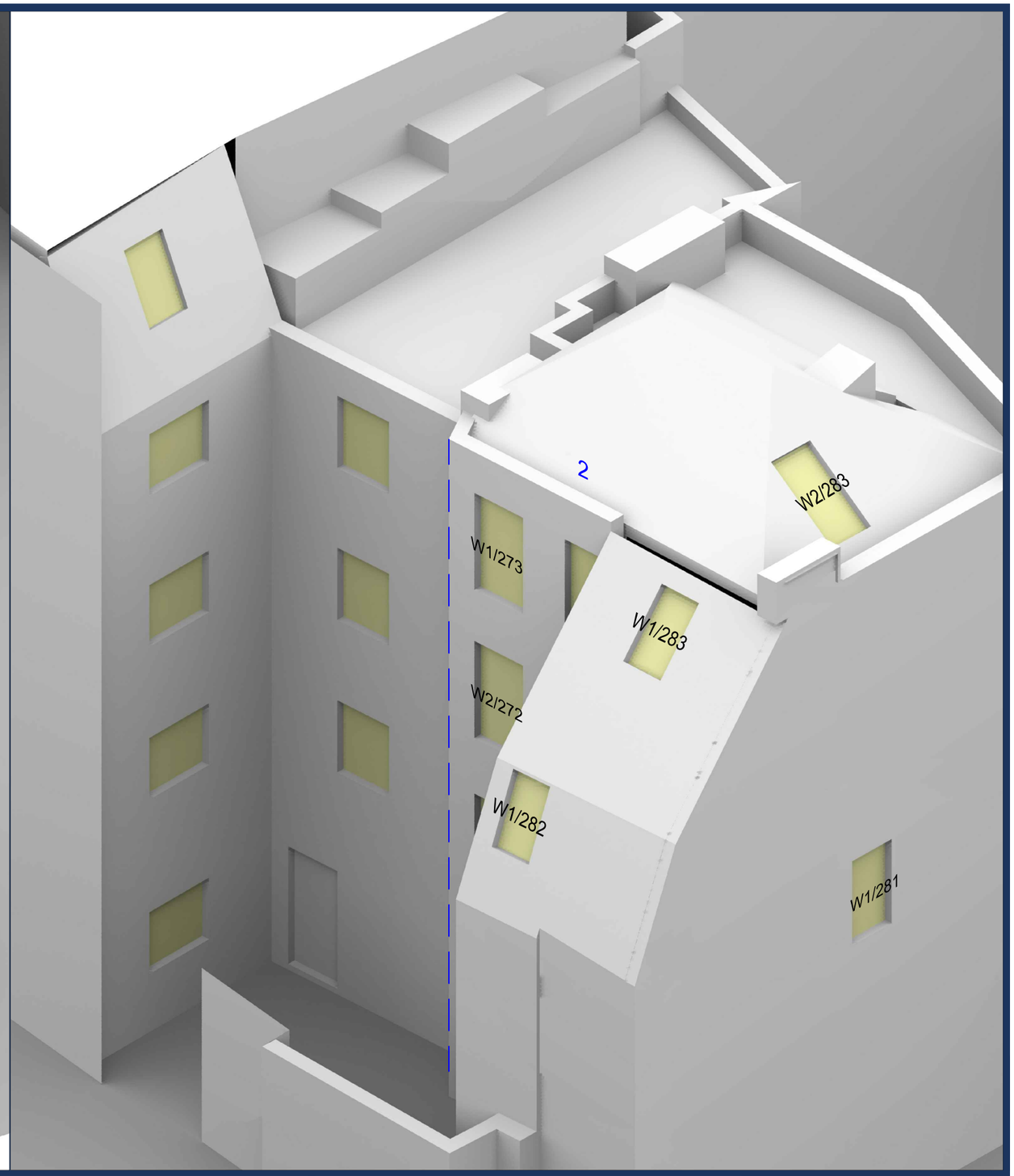
SUNLIGHT ANALYSIS

AVONMOUTH HOUSE, LONDON

EXISTING VS PROPOSED SCHEME DATED 07-09-21

APSH														
Room	Window	Room Use	Window				Winter %Loss	Annual %Loss	Room				Winter %Loss	Annual %Loss
			Existing		Proposed				Existing		Proposed			
			Winter APSH	Annual APSH	Winter APSH	Annual APSH			Winter APSH	Annual APSH	Winter APSH	Annual APSH		
2 AVONMOUTH STREET														
R1/271	W1/271	ASSUMED	0	5	0	5	-	0.0						
R1/271	W2/271	ASSUMED	1	10	1	10	0.0	0.0	1	13	1	13	0.0	0.0
R1/272	W1/272	ASSUMED	0	7	0	7	-	0.0						
R1/272	W2/272	ASSUMED	4	19	4	18	0.0	5.3	4	23	4	22	0.0	4.3
R1/273	W1/273	ASSUMED	16	42	8	26	50.0	38.1						
R1/273	W2/273	ASSUMED	4	23	4	22	0.0	4.3	16	45	8	29	50.0	35.6
R1/281	W1/281	ASSUMED	13	54	6	35	53.8	35.2	13	54	6	35	53.8	35.2
R1/282	W1/282	ASSUMED	11	48	4	30	63.6	37.5	11	48	4	30	63.6	37.5
R1/283	W1/283	ASSUMED	21	60	12	39	42.9	35.0						
R1/283	W2/283	ASSUMED	21	75	11	55	47.6	26.7	21	75	12	57	42.9	24.0





Sources: LRM Survey Services
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Stitch Architects
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21235-STCH-SK-50-Geolocation.pdf
Proposed Scheme 2D Data (received 09/09/21)
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21235-STCH-XX-ZZ-DR-A-0300-Proposed building - Section AA.dwg
21235-STCH-XX-ZZ-DR-A-0201-Proposed building - East elevation.dwg

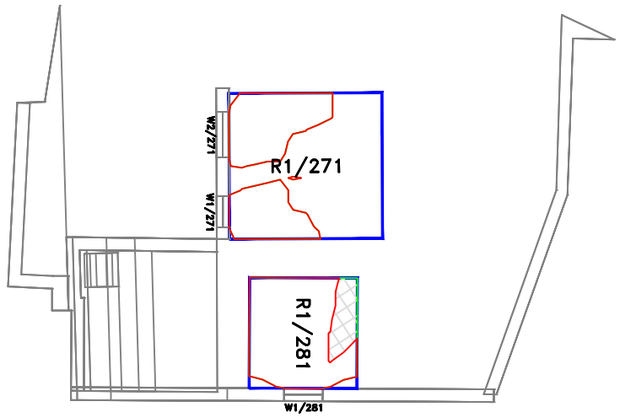
Key:

Project: Avonmouth House

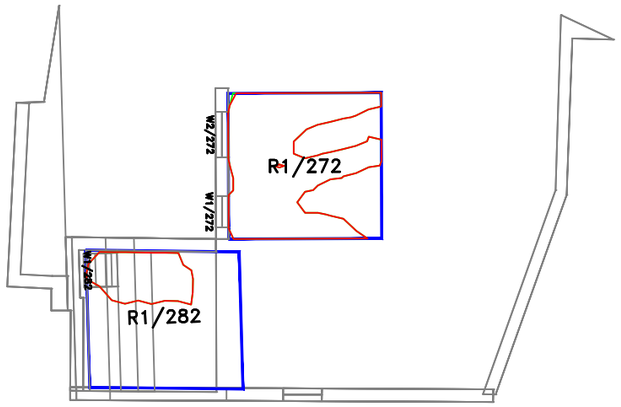
Title: Window Locations
2 Avonmouth Street

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	MC	NTS@A3	Sep 21	P2747/WM/07	04

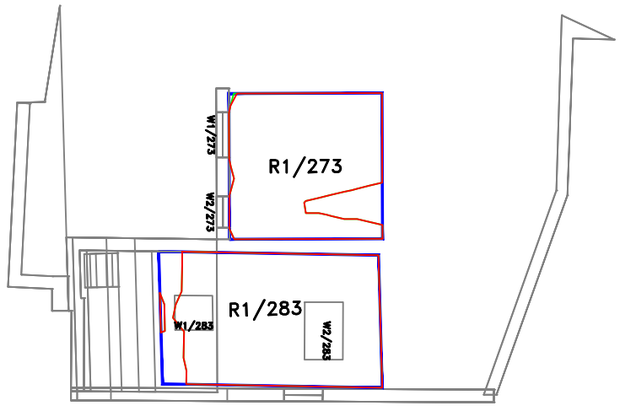
POINT 2



First Floor



Second Floor



Third Floor

Sources: LRM Survey Survices
2D Survey (received 07/06/21)
Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

Stitch Architects
Proposed Scheme 3D Model (received 07/09/21)
210907-AvonmouthModel.skp
21235-STCH-XX-ZZ-DR-A-0200-0203.pdf
21235-STCH-SK-50-Geolocation.pdf

Key:
- Existing NSL Contour
- Proposed NSL Contour
- Region of Loss / Gain

Project: Avonmouth House

Title: Daylight & Sunlight Contours
Existing vs Proposed Scheme 07/09/21

2 Avonmouth Street

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	AG	1:150@A3	Nov 22	P2747/NSL/07	13

Sources: LRM Survey Survices
2D Survey (received 07/06/21)
Avonmouth House, 6 Avonmouth Street, SE1 6NX - Topographical Survey.dwg

Stitch Architects
Proposed Scheme 3D Model (received 07/09/21)
210907-AvonmouthModel.skp
21235-STCH-XX-ZZ-DR-A-0200-0203.pdf
21235-STCH-SK-50-Geolocation.pdf

Key:
- Area analysed
- Area with more than 2 hours of direct sunlight
- Area with less than 2 hours of direct sunlight
- 50% Percentage of area with more than 2 hours of direct sunlight

Project: Avonmouth House

Title: BRE 2hrs Sunlight Test
Plan View
Existing vs Proposed Scheme 07/09/21
March 21st

Scheme Confirmed:	Date:	Drawn By:	Scale:	Date:	Dwg No:	Rel:
-	-	AG	1:500@A3	Nov 22	P2747/SHA/01	13

POINT 2

APPENDIX H - Standard Survey Limitations

1.1 Our understanding of the existing site and surrounding properties, including their fenestration, was established from the survey information, a 3d model of the site and surrounding area created from photogrammetric survey and site photographs. Planning records for the neighbouring properties, estate agent particulars and site photographs have been used to supplement this information.

1.2 The model of the proposal used in the analysis was provided by the architects.

1.3 We have sourced estate agent particulars for flats within each of Telford House, Stephenson House and 57-61 Newington Causeway. These have been used to inform the internal room arrangements used in the analysis. No information was available online in relation to the room layouts within 2 Avonmouth Street, and we have therefore made best estimates regarding the internal arrangements of this property.