



Unlocking potential for a better built environment

DAYLIGHT, SUNLIGHT AND OVERSHADOWING

IMPACT ON NEIGHBOURING
PROPERTIES REPORT

Trout Road

Troutbourne LLP

08 September 2025

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CONTENTS

1	EXECUTIVE SUMMARY	2
2	THE SITE & PROPOSED DEVELOPMENT	4
3	POLICY & GUIDANCE	6
4	DAYLIGHT & SUNLIGHT IMPACTS TO NEIGHBOURING PROPERTIES	8
5	OVERSHADOWING ASSESSMENT	28
6	CONCLUSIONS	30

APPENDICES (BOUND SEPARATELY)

APPENDIX 01
**PRINCIPLES OF DAYLIGHT, SUNLIGHT, OVERSHADOWING
AND PHOTOVOLTAICS**

APPENDIX 02
DRAWINGS

APPENDIX 03
ASSUMPTIONS

APPENDIX 04
RESULTS & CONTOURS

APPENDIX 05
FLOOR PLANS

APPENDIX 05
OVERSHADOWING STUDY

1 EXECUTIVE SUMMARY

GLA have assessed the Patel Taylor scheme at Rainbow and Kirby Industrial Estates, Trout Road, Yiewsley, UB7 7XT to understand the potential changes in light to the relevant sensitive receptors.

- 1.1 GLA have been instructed by Troutbourne LLP ("The Applicant") to advise on impacts to daylight, sunlight and overshadowing in relation to the proposal at Rainbow and Kirby Industrial Estates, Trout Road, Yiewsley, UB7 7XT ("The Site").
- 1.2 The technical analysis has been considered by reference to the criteria and methodology within the Building Research Establishment Guidance (BR209, 2022) which when published, recognised that it *"is advisory and the numerical target values within it may be varied to meet the needs of the development and its location"*¹.
- 1.3 Our detailed analysis considers 705 windows across 38 individual properties which have been selected due to their planning use, proximity and orientation towards the Site.
- 1.4 Whilst the methodology within the BRE Guidelines focuses on whether the alteration in daylight and/or sunlight will cause a noticeable change, this does not necessarily mean that the change in light condition is unacceptable. The Mayor of London's Housing Supplementary Planning Guidance (Housing SPG – see Section 3) focuses on retained values and allows a contextual appreciation of daylight and sunlight amenity against the requirement for higher density at housing sites within London.
- 1.5 It should also be noted that in recent GLA and appeal decisions retained VSC values in the 'mid-teens' are regularly regarded as acceptable in an urban locality such as West Drayton. The Whitechapel Estate (ref: APP/E5900/W/17/3171437) Appeal Decision, as one example, states: *"The figures show that a proportion of residential Vertical Sky Component ('VSC') values in the mid-teens have been found acceptable in major developments across London"*.
- 1.6 When assessed against the Vertical Sky Component ("VSC") methodology for daylight, 520/705 (74%) windows meet BRE criteria. Of the 185 windows falling short of guidance for VSC, 118 (64%) will have VSC values in the mid teens. In GLA's experience and in consideration of appeal decisions elsewhere, such levels may be considered acceptable.
- 1.7 Where neighbouring windows experience greater BRE transgressions, there are 39 windows across Caxton House, Onslow Court and Rowlock House have VSC values below the mid-teen range in the existing scenario which are reduced further in the proposed scenario. The remaining shortfalls are attributable mainly to the underdeveloped nature of the existing site. The lack of obstruction opposite the sensitive receptors will mean that any viable scheme will inevitably produce a reduction to the daylight conditions of neighbouring buildings. Some impacts are further compounded by the effects of recessed windows beneath roof overhangs or projecting balconies. Such architectural features serve to self-limit the amount of light which can penetrate the windows/rooms beneath. Taking into consideration the underdeveloped site and the architectural form of the impacted buildings, such factors mean that meeting the BRE's nationally applicable recommendations is more challenging.
- 1.8 We have been able to source floor plans for 17 of the neighbouring properties and have assessed the rooms within these properties against the No Sky Line ("NSL") daylight methodology in accordance with 2.2.10 of the BRE Guidelines. Of the 331 rooms assessed, 263 (80%) will meet BRE criteria for daylight.
- 1.9 GLA considers there to be 376 windows across the 31 existing properties which face within 90° due south of the Site relevant for sunlight assessment. When assessed against Annual Probable Sunlight Hours ("APSH") methodology, 340/374 (91%) windows demonstrate BRE compliance.
- 1.10 There will be an expectation for change to daylight and sunlight in this location given the Site's allocation and that it is on the fringe of the Yiewsley and West Drayton Town Centre (Hillingdon Local Plan 2020). As such, a practical and flexible application of the BRE Guidelines is necessary in this context. With the Proposed Development in place, the overall results indicate high levels of retained daylight for neighbouring properties, with a considerable majority of non-compliant windows maintaining VSC values in the mid-teen teens to low twenties.
- 1.11 It is important to note that the BRE Guidelines should be treated flexibly in an urban environment, Section 1.6 of the guidelines state that; *"Although, it gives numerical guidelines, these should be interpreted*

¹ Littlefair, P. (2022). Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice. Hertfordshire: HIS BRE Press, p 85 para F1

flexibly since natural lighting is only one of many factors in site layout design”.

- 1.12 In relation to the overshadowing assessment conducted upon to the amenity spaces Rowlock House, Caxton House and private gardens are 14-20 (even) St Stephen Street, all amenity spaces will demonstrate BRE compliance.
- 1.13 Overall, having considered the relevant local policies and the Governments recognition for increased flexibility on daylight and sunlight matters, it is in GIA's view that the impacts arising by the Proposed Development are within the flexible intention of the BRE Guidelines. Therefore can be considered acceptable from a daylight and sunlight perspective.
- 1.14 This report is supported by several documents, drawings and results which are all enclosed within the Appendices as listed on the Contents Page. All assumptions used in collating this report can be found in Appendix 03.

2 THE SITE & PROPOSED DEVELOPMENT

GIA have been instructed to review and advise on the daylight and sunlight impacts associated with the implementation of the Proposed Development at Trout Road.

THE SITE

- 2.1 The Site comprises the Rainbow and Kirby Industrial Estates, which accommodate an approximately 2.3 hectare plot within the London Borough of Hillingdon ('LBH'). Parts of the Site front the south side of Trout Road, the western side of Yiewsley High Street, and the northwest side of St Stephen's Road, with the entire southwest boundary bordered by the Grand Union Canal. The Site largely accommodates a range of single-storey and two-storey industrial buildings, many of which were in a poor state of repair, particularly those fronting Trout Road.
- 2.2 The surrounding area comprises a mix of industrial uses, commercial uses and residential properties, with building heights ranging from two storeys up

to five storeys. Both the former church immediately opposite the Site's High Street frontage and the George & Dragon Public House to the north are locally listed buildings. The Site is not located within a conservation area and does not contain any statutory listed or locally listed buildings.

- 2.3 The Site is allocated in the LBH Local Plan, adopted in 2020, for a mixed-use development which is to be brought forward 'in accordance with the broad parameters of the approved scheme, subject to site-specific constraints (Ref: 38058/APP/2013/1756)'.
- 2.4 Figure 01 below illustrates the Site in the existing scenario. Further drawings are enclosed at Appendix 02 of this report.

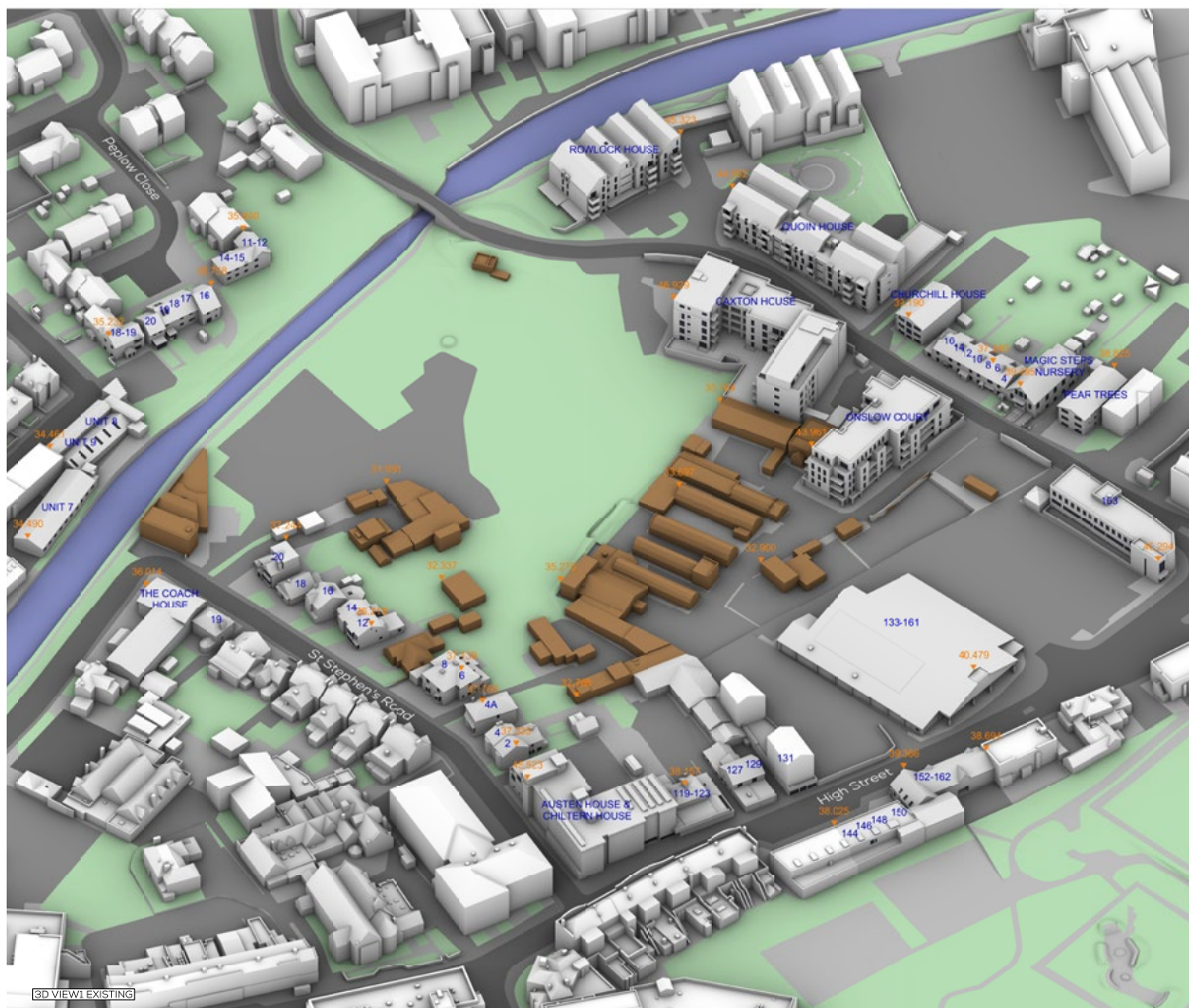


Figure 01: 3D model of existing site

THE PROPOSED DEVELOPMENT

- 2.5 The Proposed Development seeks for the “Demolition of existing structures and phased redevelopment of the site to provide nine plots ranging between 3 storeys and 11 storeys in height (including ground level) to include residential units (Use Class C3), flexible retail/café/restaurant floorspace (Class E (a,b,c)), light industrial floorspace (Class E (g)(iii)), associated hard and soft landscaping, car parking, cycle parking, servicing, refuse and plant areas, public realm improvements, highways works and other works associated with the development.”
- 2.6 Figure 02 below illustrates the Site in the proposed scenario. Further drawings are enclosed at Appendix 02 of this report.

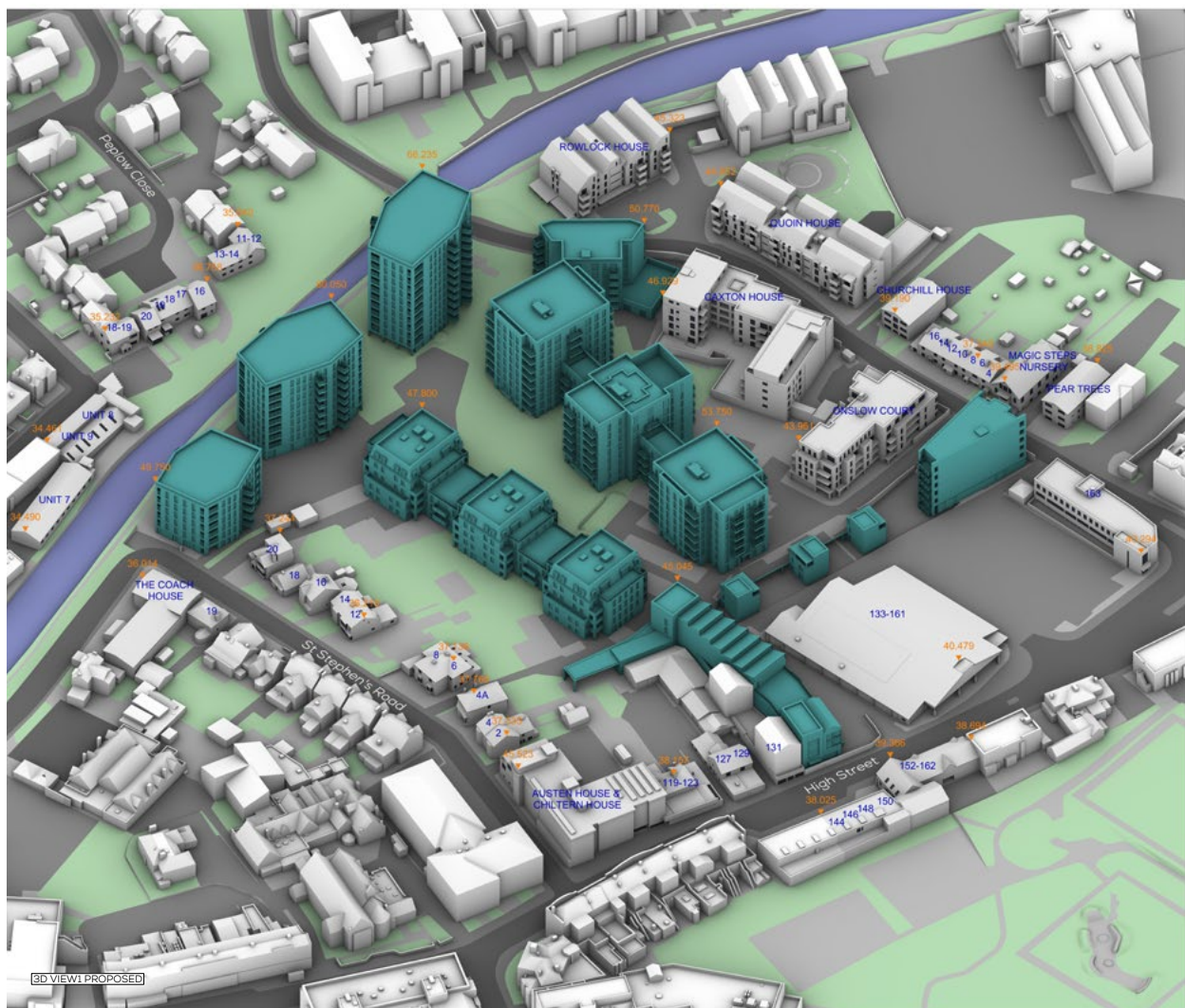


Figure 02: 3D model of the Proposed Development

3 POLICY & GUIDANCE

This section details the relevant policy and guidance for daylight and sunlight amenity including overshadowing.

3.1 Outlined below are sections from the following documents which are considered to be the most pertinent in relation to daylight and sunlight matters and how the effects of the Proposed Development on relevant neighbouring properties have been approached:

- National Planning Policy Framework (December 2024);
- National Planning Practice Guidance (updated February 2025);
- London Plan (March 2021);
- Housing Design Standards LPG (June 2023);
- Mayor's Housing SPG (March 2016); and
- Hillingdon Local Plan - Development Management Policies (adopted January 2020) (LBH).

3.2 The key headlines from each of the documents can be summarised as follows:

- 1 The NPPF highlights the Government's recognition that increased flexibility is required on daylight and sunlight in response to the requirement for higher density development. By stating that *"when considering applications for housing, 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)"*¹ (our emphasis).
- 2 The NPPG outlines that all developments should *"maintain acceptable living standards"* and that assessing appropriate daylight and sunlight amenity *"will depend to some degree on context"*².
- 3 It is clear from the London Plan 2021 that the GLA's focus is on "sufficient" or retained daylight and sunlight to neighbouring properties "that is appropriate for its context" by reference to criterion 'd' of Policy D6 (Housing Quality and Standards);
- 4 The GLA published new guidance which aims to help interpret the London Plan 2021 policies on housing-related design to assist designers and decision makers when designing and assessing a development. At

paragraph 4.1.2, the LPG outlines that daylight impacts should be considered in a specific way: *"These standards aim to complement the consideration of daylight and sunlight impacts using the BRE guidance (Site layout planning for daylight and sunlight: a guide to good practice). This process involves a two-stage approach: firstly, by applying the BRE guidance; and secondly, by considering the location and wider context when assessing any impact."*

- 5 The GLA's Housing SPG advocates a flexible approach to daylight and sunlight matters, advising that *"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."*
- 6 Policy DMHB 11 (Design of New Development) states that *"development proposals should not adversely impact on amenity, daylight and sunlight of adjacent properties and open space"*. The supplementary text within the policy document sets out at para. 5.41 that *"The Council will expect the impact of the development to be assessed following the methodology set out in the most recent version of the Building Research Establishments (BRE) 'Site layout planning for daylight and sunlight: A guide to good practice'."*

3.3 Finally, the BRE Guidelines 2022 offer a numerical methodology to calculate changes in daylight and sunlight condition and are widely used in the industry. The key criteria within the BRE (Vertical Sky Component "VSC", No Sky Line "NSL" and Annual Probable Sunlight Hours "APSH") have been used to understand and compare the existing and retained levels of light once the Proposed Development has been implemented.

1 MHCLG. (2019). National Planning Policy Framework (2021), p 37, paragraph 125(c)

2 MHCLG. (2021). National Planning Policy Guidance (2021), paragraph 66-007-20190722

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4 DAYLIGHT & SUNLIGHT IMPACTS TO NEIGHBOURING PROPERTIES

This section details the daylight and sunlight impacts in relation to the relevant properties neighbouring the Site.

MODELLING

- 4.1 A three-dimensional computer model of the Site and surrounding properties was produced based on a full measured survey undertaken by GIA. Where available, floor plans of the relevant properties have been included and this context model has been used to carry out the technical assessments. All relevant assumptions made in producing this model can be found in Appendix 03.

TWO-STAGE APPROACH

- 4.2 The impacts to relevant neighbouring properties have been considered in two stages:

Stage 1 - Is there a strict compliance with the BRE Guidelines?

- The national numerical assessments for daylight and sunlight as outlined in the BRE Guidelines are applied. Where properties, windows and/or rooms meet the recommendations of the BRE Guidelines, these are not discussed further.

Stage 2 - Is there an adverse impact to daylight and sunlight amenity?

- Where properties, windows and rooms do not meet the recommendations of the BRE Guidelines, wider material considerations are examined and applied.

RELEVANT NEIGHBOURING PROPERTIES

- 4.3 Figure 01 illustrates the properties GIA have deemed relevant for daylight and sunlight assessment. All results can be found in Appendix 04.
- 4.4 The following properties will meet the numerical recommendations set out within the BRE Guidelines (Stage 1) and are not discussed further:
- 163 High Street
 - Austen House & Chiltern House
 - 2 St Stephens Road
 - 4 St Stephens Road
 - 4a St Stephens Road
 - 16 Trout Road
 - 14 Trout Road
 - 12 Trout Road
 - 10 Trout Road
 - 8 Trout Road

- 4 Trout Road
- 152-162 High Street
- 150 High Street

- 4.5 The properties which do not meet the numerical recommendations set out within the BRE Guidelines are considered in further detail. These properties are identified in Figure 03 overleaf. Furthermore, Table 01 on page 10 provides a summary of the overall daylight and sunlight results for all properties considered.

DISCUSSION OF RESULTS

- 4.6 In order to establish whether the Proposed Development will adversely impact to daylight and sunlight amenity (Stage 2), the following material considerations have been examined and applied (where relevant):
- 1 As part of the Hillingdon Local Plan 2020, the Site is allocated (Policy SA39: Trout Road Yiewsley) and sits on the fringe of the Yiewsley and West Drayton Town Centre. As such, there will be an expectation for change to daylight and sunlight in this location.
 - 2 If room layouts are unknown, then only the VSC methodology will be considered in line with paragraph 2.2.10 and Appendix D of the BRE Guidelines;
 - 3 If architectural features (e.g. overhanging balconies) exist which would restrict daylight or sunlight to rooms lit by windows beneath them in accordance with paragraph 2.2.17 of the BRE Guidelines. An assessment with balconies removed had been conducted in accordance with paragraph 2.2.13 of the BRE Guidelines;
 - 4 Where bedrooms are affected (daylight), Section 2.2.10 of the BRE Guidelines states that it *"should also be analysed although they are less important"*;
 - 5 Where single aspect rooms are greater than 5m deep, Section 2.2.12 of the BRE Guidelines states; *"if an existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the no sky line may be unavoidable"*;
 - 6 If the change in sunlight is to a bedroom or kitchen; the BRE Guidelines notes at Section 3.2.3 that *"Normally loss of sunlight need not be analysed to kitchens and bedrooms"*.



Figure 03: Location of properties to be discussed in detailed (Stage 2)

ADDRESS	VERTICAL SKY COMPONENT			
	WINDOW			
	TOTAL	PASS	COMP. %	20-30
CAXTON HOUSE	115	55	48%	6
ONslow COURT	116	64	55%	8
163 HIGH STREET	29	29	100%	0
131 HIGH STREET	22	14	64%	0
AUSTEN HOUSE & CHILTERN HOUSE	46	46	100%	0
2 ST STEPHENS ROAD	7	7	100%	0
4 ST STEPHENS ROAD	4	4	100%	0
4A ST STEPHENS ROAD	7	7	100%	0
6 ST STEPHENS ROAD	16	15	94%	1
8 ST STEPHENS ROAD	15	15	100%	0
12 ST STEPHENS ROAD	16	16	100%	0
14 ST STEPHENS ROAD	6	5	83%	1
16 ST STEPHENS ROAD	14	11	79%	3
18 ST STEPHENS ROAD	4	2	50%	1
20 ST STEPHENS ROAD	12	10	83%	1
19 ST STEPHENS ROAD	12	8	67%	4
18-19 PADCROFT ROAD	6	5	83%	1
20 PEPLOW CLOSE	5	1	20%	0
19 PEPLOW CLOSE	9	5	56%	1
18 PEPLOW CLOSE	2	0	0%	0
17 PEPLOW CLOSE	3	0	0%	1
16 PEPLOW CLOSE	5	1	20%	0
14-15 PEPLOW CLOSE	6	0	0%	0
11-12 PEPLOW CLOSE	8	6	75%	0
ROWLOCK HOUSE	45	37	82%	1
QUOIN HOUSE	60	56	93%	4
CHURCHILL HOUSE	6	6	100%	0
16 TROUT ROAD	3	3	100%	0
14 TROUT ROAD	3	3	100%	0
12 TROUT ROAD	2	2	100%	0
10 TROUT ROAD	2	2	100%	0
8 TROUT ROAD	2	2	100%	0
6 TROUT ROAD	6	2	33%	3
4 TROUT ROAD	3	3	100%	0
MAGIC STEPS NURSERY	18	13	72%	5
PEAR TREES	43	38	84%	5
152-162 HIGH STREET	25	25	100%	0
150 HIGH STREET	2	2	100%	0
TOTALS	705	520	74%	46

Table 01: Summary of daylight and sunlight results

			NO SKY LINE			ANNUAL PROBABLE SUNLIGHT HOURS		
			ROOM			WINDOW		
LOSS (%)			TOTAL	PASS	COMP. %	TOTAL	PASS	COMP. %
0	30-40	40+						
	14	40	82	59	72%	76	56	74%
	13	31	69	46	67%	42	31	74%
	0	0	20	20	100%	27	27	100%
	3	5	15	13	87%	12	12	100%
	0	0	31	31	100%	26	26	100%
	0	0	-	-	-	-	-	-
	0	0	-	-	-	1	1	100%
	0	0	4	4	100%	2	2	100%
	0	0	5	5	100%	3	3	100%
	0	0	5	4	80%	7	7	100%
	0	0	4	2	50%	6	6	100%
	0	0	-	-	-	2	2	100%
	0	0	-	-	-	6	6	100%
	1	0	-	-	-	1	0	0%
	0	1	8	8	100%	5	5	100%
	0	0	3	3	100%	-	-	-
	0	0	-	-	-	4	4	100%
	4	0	-	-	-	1	1	100%
	3	0	-	-	-	3	3	100%
	2	0	-	-	-	-	-	-
	2	0	-	-	-	-	-	-
	2	2	-	-	-	-	-	-
	6	0	-	-	-	-	-	-
	2	0	-	-	-	-	-	-
	3	4	28	23	82%	9	9	100%
	0	0	45	39	87%	57	57	100%
	0	0	6	0	0%	6	6	100%
	0	0	3	3	100%	3	3	100%
	0	0	-	-	-	3	3	100%
	0	0	-	-	-	2	2	100%
	0	0	-	-	-	2	2	100%
	0	0	-	-	-	2	2	100%
	1	0	2	2	100%	6	4	67%
	0	0	1	1	100%	2	2	100%
	0	0	-	-	-	7	7	100%
	0	0	-	-	-	24	24	100%
	0	0	-	-	-	25	25	100%
	0	0	-	-	-	2	2	100%
	56	83	331	263	80%	374	340	91%

CAXTON HOUSE



4.7 Caxton House is a residential building adjoining the northern boundary of the Site. Internal layouts for this property have been sourced from LBH's online planning portal and subsequently incorporated into GIA's 3D analysis model.

4.8 When undertaking our technical analysis, GIA have found there to be 115 windows serving 82 rooms relevant for assessment.

Stage 1 - Is there a strict compliance with the recommendations in the BRE Guidelines?

4.9 When assessed against the VSC methodology for daylight, 55/115 (48%) windows assessed will meet BRE criteria.

4.10 When assessed against the NSL methodology for daylight, 59/82 (72%) rooms assessed will meet BRE criteria.

4.11 GIA have considered 78 windows within this property that face within 90° due south of the Site relevant for sunlight assessment. When assessed against APSH sunlight methodology, 56/76 (74%) will satisfy BRE recommendations.

Stage 2 - Is there an adverse impact to daylight and sunlight amenity?

VSC

4.12 Of the windows falling below BRE Guidelines, six windows will see minor VSC alterations between 23.7% and 29.6% (against a BRE recommendation of

20%) and 14 windows will experience moderate VSC alterations between 30.7% and 39.5%. The remaining 40 windows will experience VSC alterations in excess of 40%.

4.13 When we consider the retained daylight levels to the impacted windows, 30 will retain VSC values between 15.7% and 25.7% (against a BRE recommendation of 27%). In GIAs experience and in consideration of appeal decisions elsewhere, VSC values in excess of the mid-teens may be considered acceptable in urban settings across London boroughs.

4.14 In instances where VSC values fall below this range, this is primarily attributable to their recessed positioning within the building (outlined in blue in Figure 04) or due to their location beneath projecting balconies (outlined in green in Figure 04). The BRE acknowledges (Section 2.2.13) 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". The windows recessed within the building (beneath projecting walkways) experience low VSC values between 2%-7% in the existing scenario which will be further reduced upon implementation of the Proposed Development. Whereas the impacted windows located beneath projecting balconies generally retain VSC values below 13% in the proposed scenario.

4.15 A second assessment has been undertaken without the balconies in place, in line with section 2.2.13 of the BRE Guidelines, to demonstrate the effect they are having. The analysis demonstrates that the VSC compliance remains the same, however, the degree of alteration is significantly reduced. We note that 40 of the windows experiencing VSC transgressions will see minor-moderate alterations between 23.1% and 39.6%. The quantity of windows experiencing a VSC alteration beyond 40% is reduced from 40 windows to 20 windows with balconies notionally removed. Where larger alterations continue to occur, this is due to windows recessed windows within the building or the close proximity of windows overlooking the Development Site. Retained VSC values will also vastly improve with 42 of the impacted windows retaining between 15% and 26% VSC. It is evident that the architectural make up of the building itself will lead to exaggerated VSC impacts.

NSL

- 4.16 Of the 23 rooms falling below BRE criteria for NSL, nine rooms will experience minor NSL alterations between 20.2% and 29.4% and four rooms experience moderate alterations between 35%-38.9%. The remaining 13 rooms will experience NSL alterations in excess of 40%. We note that 18 of the impacted rooms are bedrooms, Section 2.2.10 of the BRE Guidelines states that bedrooms *"should also be analysed although they are less important"*. The remaining five rooms are living rooms/LKD's, three of which will continue to retain good NSL values between 57.2% and 79.3%. Two LKD's (R7/F00 and R7/R01) retaining lower NSL values directly overlook the proposed massing at the northern end of the Site.

APSH

- 4.17 Of the 20 windows falling short of BRE for APSH, four windows serve rooms which remain compliant when assessed against the supplementary APSH to room assessment, due to the presence of mitigating windows that also serve these rooms. Of the remaining 16 windows, 13 serve either bedrooms or kitchens. The BRE outlines at Section 3.2.3 that *"Normally loss of sunlight need not be analysed to kitchens and bedrooms"*. The final three windows serve LKD's on the ground and first floor of Caxton House. One LKD window (W12/F01) will see annual sunlight levels reduce to 24% (against a BRE recommendation of 25%) and will meet BRE criteria for winter sunlight. The remaining two windows (W19/F00 and W19/F01) will meet BRE criteria for annual sunlight, however, will see winter sunlight levels reduce to 3% and 4% respectively

(against a BRE recommendation of 5%) which is a marginal shortfall.

Summary

- 4.18 The windows within Caxton House directly overlook the underdeveloped Site, therefore, they currently have an unobstructed view across the Site, which is uncommon for urban areas such as this. We also note that Appendix F of the BRE Guidelines acknowledges this circumstance in which buildings may represent a 'bad neighbour' which sit unusually close to the site boundary, taking *"more than their fair share of light"*.
- 4.19 Many of the windows and rooms experiencing daylight alterations are inherently constrained by their own architectural design, such as being recessed within the building or located beneath projecting balconies. When these architectural limitations are considered alongside the currently underdeveloped nature of the Site, achieving full compliance with the BRE Guidelines becomes particularly challenging. We also note that as part of the Hillingdon Local Plan 2020, the Site is allocated (Policy SA39: Trout Road Yiewsley) and sits on the fringe of the Yiewsley and West Drayton Town Centre. As such, there will be an expectation for change to daylight and sunlight in this location.
- 4.20 In light of this, it is GIA's opinion that the daylight and sunlight impacts to this property are acceptable and remain consistent with the flexible intent of the BRE Guidelines.



Figure 04: Caxton House window map

ONSLow COURT



- 4.21 Onslow Court is a residential building adjoining the northern boundary of the Site. Internal layouts for this property have been sourced from LBH's online planning portal and subsequently incorporated into GIA's 3D analysis model.
- 4.22 When undertaking our technical analysis, GIA have found there to be 116 windows serving 69 rooms relevant for assessment.

Stage 1 - Is there a strict compliance with the recommendations in the BRE Guidelines?

- 4.23 When assessed against the VSC methodology for daylight, 64/116 (55%) windows assessed will meet BRE criteria.
- 4.24 When assessed against the NSL methodology for daylight, 46/69 (67%) rooms assessed will meet BRE criteria.
- 4.25 GIA have considered 42 windows within this property that face within 90° due south of the Site relevant for sunlight assessment. When assessed against APSP sunlight methodology, 31/42 (74%) will satisfy BRE recommendations.

Stage 2 - Is there an adverse impact to daylight and sunlight amenity?

VSC

- 4.26 Of the windows falling short of BRE criteria for VSC, eight windows experience minor VSC alterations between 21.5% and 29.5% and 13 experience moderate VSC alterations between 33% and

39.2%. The remaining 31 windows experience VSC alterations in excess of 40%. When we consider the retained daylight levels to the impacted windows, 22 windows will retain VSC values between 15% and 26.5%. As previously discussed within this report, VSC values in excess of the mid-teens may be considered acceptable in urban settings across London boroughs. Where windows retain lower VSC values, this is primarily attributable to their recessed position in the building or due to their location beneath projecting balconies. We note there are 13 architecturally burdened windows with low existing VSC values below 10% which are further reduced in the proposed scenario.

- 4.27 A second assessment has been undertaken without the balconies in place, in line with section 2.2.13 of the BRE Guidelines, to demonstrate the effect they are having. The analysis demonstrates that four additional windows will meet BRE criteria for VSC and the overall degree of alteration has significantly reduced. We note that 29 of the windows experiencing VSC transgressions will see minor-moderate alterations between 21.3% and 38.6%. The quantity of windows experiencing a VSC alteration beyond 40% is reduced from 31 windows to 20 windows with balconies notionally removed. Retained VSC values will also vastly improve with 33 of the impacted windows retaining between 15% and 26% VSC. The 15 windows that continue to retain lower VSC values below the mid-teen range are architecturally burdened by their own building form and all serve bedrooms which are considered less sensitive to daylight alterations.

NSL

- 4.28 Of the rooms falling short of BRE criteria for NSL, five experience minor alterations between 20.2% and 28.5% and six experience moderate alterations between 32.7% and 36.6%. The remaining 12 rooms experience NSL alterations in excess of 40%. We have identified that 16 of the impacted rooms serve bedrooms which the BRE considers to be "less important" when considering daylight distribution. The remaining seven rooms are LKD's which will retain NSL values between 40.2% and 52%. All seven LKD's are single aspect and between 6m-8m deep. Section 2.2.12 of the BRE states 'If an existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the no sky line may be unavoidable.'

APSH

- 4.29 Of the 11 windows falling short of BRE criteria for APSH, four windows serve rooms which remain compliant when assessed against the supplementary APSH to room assessment, due to the presence of mitigating windows that also serve these rooms. Five of the impacted windows serve bedrooms, Section 3.2.3 that *“Normally loss of sunlight need not be analysed to kitchens and bedrooms”*. The remaining two windows serve LKD’s. The ground floor window (W19/F00) will retain 22% annual sunlight (against a BRE recommendation of 25%) and the first floor window will remain compliant for annual sunlight. In relation to winter sunlight, the LKD windows will retain 2% and 4% winter sunlight (against a BRE recommendation of 5%).

Summary

- 4.30 The windows within Onslow Court directly overlook the currently underdeveloped Site to the south and east, therefore, they currently have an unobstructed view across the Site, which is uncommon for urban areas such as this. Many of the windows and rooms experiencing daylight alterations are inherently constrained by their own architectural design, such as being recessed within the building or located beneath projecting balconies. When these architectural limitations are considered alongside the currently undeveloped nature of the Site, achieving full compliance with the BRE Guidelines becomes particularly challenging. We also note that as part of the Hillingdon Local Plan 2020, the Site is allocated (Policy SA39: Trout Road Yiewsley) and sits on the fringe of the Yiewsley and West Drayton Town Centre. As such, there will be an expectation for change to daylight and sunlight in this location.
- 4.31 In light of this, it is GIA’s opinion that the daylight and sunlight impacts to this property are acceptable and remain consistent with the flexible intent of the BRE Guidelines.

131 HIGH STREET



- 4.32 131 High Street is a recently completed residential development located to the east of the Site (LBH ref: 50382/APP/2017/3164). Internal layouts for this property have been sourced from LBH's online planning portal, however, we note that the plans obtained do not exactly replicate what has been built and we have modelled this building to closely reflect what is now constructed.
- 4.33 When undertaking our technical analysis, GIA have found there to be 22 windows serving 15 rooms relevant for assessment.

Stage 1 - Is there a strict compliance with the recommendations in the BRE Guidelines?

- 4.34 When assessed against the VSC methodology for daylight, 14/22 (64%) windows assessed will meet BRE criteria.
- 4.35 When assessed against the NSL methodology for daylight, 13/15 (87%) rooms assessed will meet BRE criteria.
- 4.36 GIA have considered 12 windows within this property that face within 90° due south of the Site relevant for sunlight assessment. When assessed against APSH sunlight methodology, all 12 windows (100%) will satisfy BRE recommendations.

Stage 2 - Is there an adverse impact to daylight and sunlight amenity?

VSC

- 4.37 Of the windows falling short of BRE Guidelines for VSC, three windows will experience a VSC alteration of between 30.3% and 37.3% and five windows will experience VSC alterations in excess of 40%. Seven of the windows retain VSC values between 16.6% and 24.4%, such values have been widely considered acceptable (on appeal) by Planning Inspectorates across the London boroughs. The remaining window (W9/F01) serves a bedroom which the BRE deems 'less important'.

NSL

- 4.38 The two rooms falling short of BRE Guidance for the NSL daylight methodology will experience alterations in excess of 40%. One room has been identified as a bedroom (F01/R7) which the BRE considers to be "less important" when considering daylight distribution. The remaining room is a single aspect LKD (F01/R6) and is more than 5m deep. Section 2.2.12 of the BRE; 'If an existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the no sky line may be unavoidable.'

Summary

- 4.39 While many of the windows experience reductions in VSC, majority of the windows retain values widely considered acceptable (on appeal) by Planning Inspectorates across the London boroughs. Furthermore, when we consider the daylight assessment to the rooms, majority of the rooms will meet BRE criteria. It is GIA's opinion that the daylight and sunlight impacts to this property are acceptable and remain consistent with the flexible intent of the BRE Guidelines.

18-19 PADCROFT ROAD



Summary

- 4.45 It is GIA's opinion that the isolated daylight impact to one window is considered acceptable and remains consistent with the flexible intent of the BRE Guidelines.

4.40 18-19 Padcroft Road is a residential building comprising flats and is located to the south west of the Site. GIA have been unable to obtain internal layouts for 18-19 Padcroft Road, therefore, we have only considered the VSC daylight methodology and APSH sunlight methodology to the windows facing the Site.

4.41 When undertaking our technical analysis, GIA have considered six windows relevant for assessment.

Stage 1 - Is there a strict compliance with the recommendations in the BRE Guidelines?

- 4.42 When assessed against the VSC methodology for daylight, 5/6 (83%) windows assessed will meet BRE criteria.
- 4.43 GIA have considered four windows within this property that face within 90° due south of the Site relevant for sunlight assessment. When assessed against APSH sunlight methodology, all four windows (100%) will satisfy BRE recommendations.

Stage 2 - Is there an adverse impact to daylight and sunlight amenity?

VSC

- 4.44 The single window (W5/F00) falling short of guidance for VSC will experience a minor alteration of 27.4%. The ground floor window will continue to retail a high VSC value of 24.1% (against a BRE recommendation of 27%).

ST STEPHENS ROAD



- 4.46 The properties at St Stephens Road are located to the south of the Site. Internal layouts for 4A, 6, 8, 12, 18, 19 and 20 St Stephens Road have been sourced from LBH's online planning portal and subsequently incorporated into GIA's 3D analysis model. Where room layouts are unknown within the remaining properties, we have only considered the VSC daylight methodology and APSH sunlight methodology to the windows facing the Site.
- 4.47 The properties located at 2, 4, and 4a St Stephens Road will remain fully BRE compliant for daylight and sunlight and are therefore not considered further (highlighted green in Table O2 overleaf). The discussion below is in consideration of 6, 8, 12, 14, 16, 18, 19 and 20 St Stephen Street. Refer to summary table (overleaf) for a breakdown of the daylight/sunlight results of each individual property at St Stephens Road.

Stage 1 - Is there a strict compliance with the recommendations in the BRE Guidelines?

- 4.48 When assessed against the VSC methodology for daylight, 82/95 (86%) windows assessed will meet BRE criteria. Where alterations beyond BRE guidance are experienced, these are seen within six of the eight impacted properties at St Stephens Road.
- 4.49 When assessed against the NSL methodology for daylight, 22/25 (88%) rooms assessed will meet BRE criteria. Where impacts beyond BRE guidance are experienced, these are seen within two of the eight impacted properties.

- 4.50 GIA have considered 30 windows within the eight properties that face within 90° due south of the Site relevant for sunlight assessment. When assessed against APSH sunlight methodology, 29/30 (97%) will satisfy BRE recommendations.

Stage 2 - Is there an adverse impact to daylight and sunlight amenity?

VSC

- 4.51 Of the 13 windows falling below BRE criteria for VSC, 11 will experience minor VSC alterations between 20.3% and 27.9%. One window in 18 St Stephen Road experiences a moderate VSC alteration of 38% and one window in 20 St Stephen Road will experience a VSC alterations in excess of 40%. Of the impacted windows, 10 will retain high VSC values in excess of 23% (against a BRE recommendation of 27%) and two windows retain VSC value of approximately 17% such values have been widely considered acceptable (on appeal) by Planning Inspectorates across the London boroughs. The remaining window in 20 St Stephens has been identified as a bedroom (W6/F01), when assessed against the supplementary VSC to room assessment, the room served by this window will meet BRE criteria due to the presence of mitigating windows that also serve this rooms

NSL

- 4.52 Of the three rooms falling short of BRE criteria for NSL, two rooms (kitchen and dining room) in 12 St Stephens Road will experience NSL alterations of 26.4% and 47.4% respectively. The remaining room (kitchen/dining) in 8 St Stephens Road will experience a moderate NSL alteration of 37.3%. All three rooms retain between 50.2% and 72.4% NSL.

APSH

- 4.53 The single window (W2/F00) within 18 St Stephens Road experiencing APSH transgressions will see annual sunlight levels reduced to 19% (against a BRE recommendation of 25%) and winter sunlight levels reduced to 1% (against a BRE recommendation of 5%). Such alterations are expected given that the impacted window would receive afternoon sun over the south-west corner of the Site which is currently underdeveloped.

Summary

- 4.54 Majority of the windows across the St Stephens Road properties retain VSC values above the mid-teens, such values have been widely considered acceptable (on appeal) by Planning Inspectorates across the London boroughs. It is GIA's opinion that the daylight and sunlight impacts to the St Stephens Road properties are acceptable and remain consistent with the flexible intent of the BRE Guidelines.

ADDRESS	VERTICAL SKY COMPONENT						NO SKY LINE			ANNUAL PROBABLE SUNLIGHT HOURS		
	WINDOW						ROOM			WINDOW		
	TOTAL	PASS	COMP. %	LOSS (%)			TOTAL	PASS	COMP. %	TOTAL	PASS	COMP. %
				20-30	30-40	40+						
2 ST STEPHENS ROAD	7	7	100%	0	0	0	-	-	-	-	-	-
4 ST STEPHENS ROAD	4	4	100%	0	0	0	-	-	-	1	1	100%
4A ST STEPHENS ROAD	7	7	100%	0	0	0	4	4	100%	2	2	100%
6 ST STEPHENS ROAD	16	15	94%	1	0	0	5	5	100%	3	3	100%
8 ST STEPHENS ROAD	15	15	100%	0	0	0	5	4	80%	7	7	100%
12 ST STEPHENS ROAD	16	16	100%	0	0	0	4	2	50%	6	6	100%
14 ST STEPHENS ROAD	6	5	83%	1	0	0	-	-	-	2	2	100%
16 ST STEPHENS ROAD	14	11	79%	3	0	0	-	-	-	6	6	100%
18 ST STEPHENS ROAD	4	2	50%	1	1	0	-	-	-	1	0	0%
20 ST STEPHENS ROAD	12	10	83%	1	0	1	8	8	100%	5	5	100%
19 ST STEPHENS ROAD	12	8	67%	4	0	0	3	3	100%	-	-	-

Table 02: Summary of daylight and sunlight results for St Stephens Road properties

PEPLOW CLOSE



4.55 The properties at Peplow Close are located to the south west of the Site and include 11-12, 13-14, 16, 17, 18, 19 and 20 Peplow Close. GIA have been unable to obtain internal layouts for these properties, therefore, we have only considered the VSC daylight methodology and APSH sunlight methodology to the windows facing the Site.

4.56 When undertaking our technical analysis, GIA have found there to be 38 windows relevant for assessment.

Stage 1 - Is there a strict compliance with the recommendations in the BRE Guidelines?

4.57 When assessed against the VSC methodology for daylight, 13/38 (34%) windows assessed will meet BRE criteria.

4.58 GIA have considered four windows within this property that face within 90° due south of the Site relevant for sunlight assessment. When assessed against APSH sunlight methodology, all four windows (100%) will satisfy BRE recommendations.

Stage 2 - Is there an adverse impact to daylight and sunlight amenity?

VSC

4.59 Of the windows falling short of BRE criteria for VSC across the properties at Peplow Close, two experience minor VSC alterations of approximately 29% (against a BRE recommendation of 20%) and 21 windows experience moderate VSC alterations

between 30% and 38.6%. The remaining two windows in 16 Peplow Close experience VSC alterations in excess of 40%. All windows will retain

4.60 Majority of the ground floor windows retain VSC values in excess of 17%. VSC values above the mid-teens have been widely considered acceptable (on appeal) by Planning Inspectorates across the London boroughs. We note that one window in 19 Peplow Close will retain 14.4% VSC, however the alteration from the existing scenario is considered minor (29.4%). First floor windows at the Peplow Close properties are architecturally burdened by their own building form by being positioned beneath a roof overhang. Notwithstanding this, all windows will retain in excess of a mid-teen VSC value.

4.61 It is important to note that the effect of the trees surrounding the Peplow Close properties has not factored into the technical assessment (trees shown in Figure 05 below). Owing to their deciduous characteristics, the trees have not been included in our analysis model which is the recommended approach by the BRE due to the difficulty in creating an accurate 3D model. What this means is that the existing daylight levels (at least for a portion of the year) are exaggerated and therefore the results presented within this report can be considered a worse case scenario. The true effects to this property would undoubtedly be less pronounced when these trees are in full or partial leaf.

Summary

4.62 Given that majority of the windows across Peplow Close properties retain daylight levels that are widely considered acceptable (on appeal) by Planning Inspectorates across the London boroughs, it is GIA's opinion that the daylight impacts are acceptable and remain consistent with the flexible intent of the BRE Guidelines.



Figure 05: Trees surrounding Peplow Close properties

ROWLOCK HOUSE



- 4.63 Rowlock House is a residential building located to the north-west of the Site. Internal layouts for this property have been sourced from LBH's online planning portal and subsequently incorporated into GIA's 3D analysis model.
- 4.64 When undertaking our technical analysis, GIA have found there to be 45 windows serving 28 rooms relevant for assessment.

Stage 1 - Is there a strict compliance with the recommendations in the BRE Guidelines?

- 4.65 When assessed against the VSC methodology for daylight, 37/45 (82%) windows assessed will meet BRE criteria. One additional window (W2/F00) serves a LKD which remains compliant when assessed against the supplementary VSC to room assessment, due to the presence of mitigating window that serves this room.
- 4.66 When assessed against the NSL methodology for daylight, 23/28 (82%) rooms assessed will meet BRE criteria.
- 4.67 GIA have considered nine windows within this property that face within 90° due south of the Site relevant for sunlight assessment. When assessed against APSH sunlight methodology, all nine windows (100%) will satisfy BRE recommendations.

Stage 2 - Is there an adverse impact to daylight and sunlight amenity?

VSC

- 4.68 Of the seven windows falling short of BRE criteria for VSC, three are unobstructed (W5/F00, W6/F00 and W4/F01) and will continue to retain good VSC values between 17.1% and 25.1%. Three windows (W4/F00, W3/F01 and W3/F02) are positioned beneath projecting balconies and will retain VSC values between 13.3% and 15.2%. The remaining window (W3/F00) is located on the southern side of the building beneath a patio cover. The absolute change to the window is 2.4%, which is unlikely to give rise to a noticeable change.
- 4.69 A second assessment has been undertaken without the balconies in place, in line with section 2.2.13 of the BRE Guidelines, to demonstrate the effect they are having. Our analysis confirms that the three windows (W4/F00, W3/F01 and W3/F02) mentioned above will retain 22.7%, 25.3% and 27.8% VSC respectively (against a BRE recommendation of 27%).

NSL

- 4.70 Of the five rooms falling short of BRE criteria for NSL, three experience minor NSL alterations between 22.5% and 23.5% and two rooms experience moderate NSL alterations of 33.4% and 37.1%. All rooms will retain good NSL values between 55.6% and 75.9%.

Summary

- 4.71 Many of the impacted windows will retain VSC values above the mid-teens, such values are widely considered acceptable (on appeal) by Planning Inspectorates across the London boroughs. Where greater transgressions occur this is due to the windows position beneath a projecting balcony. It is GIA's opinion that the daylight impacts are acceptable and remain consistent with the flexible intent of the BRE Guidelines.

QUOIN HOUSE



- 4.72 Quoin House is a residential building located to the north-west of the Site. Internal layouts for this property have been sourced from LBH's online planning portal and subsequently incorporated into GIA's 3D analysis model.
- 4.73 When undertaking our technical analysis, GIA have found there to be 60 windows serving 45 rooms relevant for assessment.

Stage 1 - Is there a strict compliance with the recommendations in the BRE Guidelines?

- 4.74 When assessed against the VSC methodology for daylight, 56/60 (93%) windows assessed will meet BRE criteria. Two additional windows (W4/F00 and W4/F02) serve rooms which remains compliant when assessed against the supplementary VSC to room assessment, due to the presence of mitigating windows that serve those rooms.
- 4.75 When assessed against the NSL methodology for daylight, 39/45 (87%) rooms assessed will meet BRE criteria.
- 4.76 GIA have considered 57 windows within this property that face within 90° due south of the Site relevant for sunlight assessment. When assessed against APSH sunlight methodology, all 57 windows (100%) will satisfy BRE recommendations.

Stage 2 - Is there an adverse impact to daylight and sunlight amenity?

VSC

- 4.77 The two windows (W5/F00 and W6/F00) falling short of BRE criteria for VSC experience minor VSC alterations of 23.3% and 20.2% respectively (against a BRE recommendation of 20%). Both windows will retain high VSC values of 19.1% and 24.5% respectively.

NSL

- 4.78 Of the rooms falling short of BRE criteria for NSL, three will experience minor NSL alterations between 22.4% and 26.4%. All three rooms are bedrooms which the BRE considers to be "less important" when considering daylight distribution. The remaining three rooms experiencing moderate NSL alterations are single aspect LKD's that are more than 5m deep. Section 2.2.12 of the BRE; 'If an existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the no sky line may be unavoidable.'

Summary

- 4.79 The isolated daylight transgressions are mostly considered minor in nature, it is therefore in GIA's opinion that the daylight impacts are acceptable and remain consistent with the flexible intent of the BRE Guidelines.

CHURCHILL HOUSE



- 4.80 Churchill House is a residential building located to the north of the Site. Internal layouts for this property have been sourced from LBH's online planning portal and subsequently incorporated into GIA's 3D analysis model.
- 4.81 When undertaking our technical analysis, GIA have found there to be six windows serving six rooms relevant for assessment.

Stage 1 - Is there a strict compliance with the recommendations in the BRE Guidelines?

- 4.82 When assessed against the VSC methodology for daylight, all six windows (100%) assessed will meet BRE criteria.
- 4.83 When assessed against the NSL methodology for daylight, all six rooms experience minor-moderate alterations beyond BRE criteria.
- 4.84 GIA have considered six windows within this property that face within 90° due south of the Site relevant for sunlight assessment. When assessed against APSH sunlight methodology, all six windows (100%) will satisfy BRE recommendations.

Stage 2 - Is there an adverse impact to daylight and sunlight amenity?

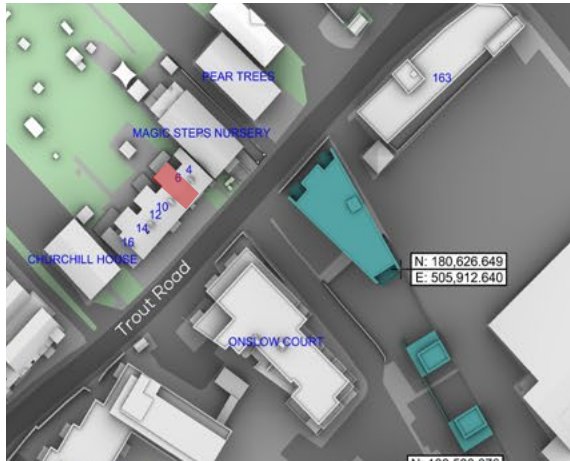
NSL

- 4.85 All six rooms falling short of BRE criteria for NSL have been identified as studio flats. Two rooms will experience minor alterations of 22.2% and 23.9% and four rooms experience moderate NSL alterations between 32.6% and 36.9%. All six rooms will retain good NSL values between 59.6% and 76.7%. We also note that all six rooms are single aspect and are 7.5m deep. Section 2.2.12 of the BRE states that "if an existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the no sky line may be unavoidable".

Summary

- 4.86 All windows meet BRE criteria for daylight and sunlight. The impacted site-facing rooms will continue to retain high NSL values for an urban location. It is in GIA's opinion that the daylight impacts are acceptable and remain consistent with the flexible intent of the BRE Guidelines.

6 TROUT ROAD



- 4.87 6 Trout Road is a residential terrace building located to the north of the Site. Internal layouts for this property have been sourced from Rightmove online property sales website and subsequently incorporated into GIA's 3D analysis model.
- 4.88 When undertaking our technical analysis, GIA have found there to be six windows serving two rooms relevant for assessment.

Stage 1 - Is there a strict compliance with the recommendations in the BRE Guidelines?

- 4.89 When assessed against the VSC methodology for daylight, 2/6 (33%) windows assessed will meet BRE criteria.
- 4.90 When assessed against the NSL methodology for daylight, both rooms assessed will meet BRE criteria.
- 4.91 GIA have considered six windows within this property that face within 90° due south of the Site relevant for sunlight assessment. When assessed against APSH sunlight methodology, 4/6 (67%) windows will satisfy BRE recommendations. When we consider APSH to the rooms, both rooms will meet BRE criteria for annual and winter sunlight.

Stage 2 - Is there an adverse impact to daylight and sunlight amenity?

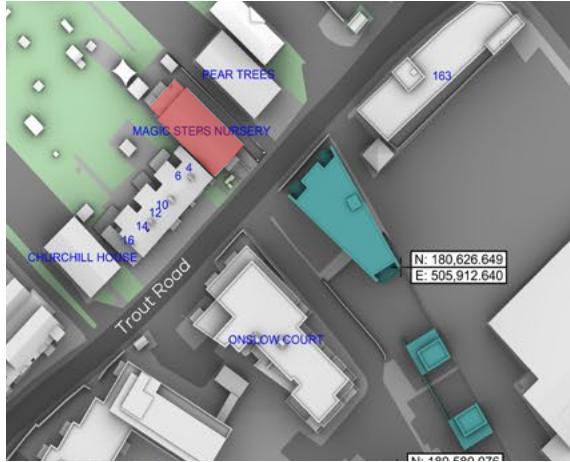
VSC

- 4.92 The four windows falling short of BRE criteria for VSC serve the ground floor living room. Three windows experience minor VSC alterations between 21.9% and 29% and will retain VSC values above 15%. The remaining window is recessed beneath a roof overhang and will experience a moderate VSC alteration of 36.3%. When assessed against the NSL daylight methodology, the living room will meet BRE criteria.

Summary

- 4.93 Both rooms facing site will meet BRE criteria for daylight and sunlight with daylight transgressions isolated to the ground floor windows. It is GIA's opinion that the daylight impacts are acceptable and remain consistent with the flexible intent of the BRE Guidelines.

MAGIC STEPS NURSERY



4.94 Magic Steps Nursery is a nursery building located to the north of the Site. We have considered the nursery within our assessment as it is stated in Section 2.2.2 of the BRE Guidelines that *'the guidelines may also be applied to any existing non-domestic building where occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices.'*

4.95 GIA have been unable to obtain internal layouts for these properties, therefore, we have only considered the VSC daylight methodology and APSH sunlight methodology to the windows facing the Site.

4.96 When undertaking our technical analysis, GIA have found there to be 18 windows relevant for assessment.

Stage 1 - Is there a strict compliance with the recommendations in the BRE Guidelines?

4.97 When assessed against the VSC methodology for daylight, 13/18 (72%) windows assessed will meet BRE criteria.

4.98 GIA have considered seven windows within this property that face within 90° due south of the Site relevant for sunlight assessment. When assessed against APSH sunlight methodology, all seven windows will satisfy BRE recommendations.

Stage 2 - Is there an adverse impact to daylight and sunlight amenity?

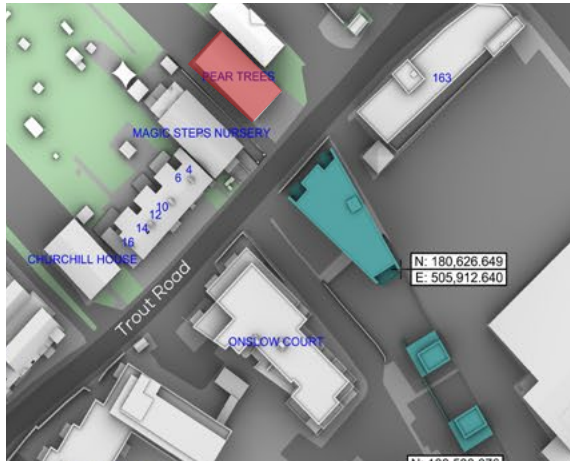
VSC

4.99 All five windows falling short of BRE criteria for VSC will experience minor alterations between 21.6% and 29.2%. All five windows retain good VSC values between 19.4% and 26.9% (against a BRE recommendation of 27%). Such values are widely considered acceptable by Planning Inspectorates across the London Boroughs for residential properties, therefore, they would also be acceptable for a transient building of this nature.

Summary

4.100 The isolated daylight transgressions are mostly considered minor in nature, it is therefore in GIA's opinion that the daylight impacts are acceptable and remain consistent with the flexible intent of the BRE Guidelines.

PEAR TREES



Summary

- 4.106 The isolated daylight transgressions are considered minor in nature and windows will continue to retain high VSC values for an urban setting. It is therefore in GIA's opinion that the daylight impacts are acceptable and remain consistent with the flexible intent of the BRE Guidelines.

- 4.101 Pear Trees is a residential building located to the north of the Site. GIA have been unable to obtain internal layouts for these properties, therefore, we have only considered the VSC daylight methodology and APSH sunlight methodology to the windows facing the Site.
- 4.102 When undertaking our technical analysis, GIA have found there to be 43 windows on the southern and western side of the building relevant for assessment.

Stage 1 - Is there a strict compliance with the recommendations in the BRE Guidelines?

- 4.103 When assessed against the VSC methodology for daylight, 38/43 (88%) windows assessed will meet BRE criteria.
- 4.104 GIA have considered 24 windows within this property that face within 90° due south of the Site relevant for sunlight assessment. When assessed against APSH sunlight methodology, all 24 windows (100%) will satisfy BRE recommendations.

Stage 2 - Is there an adverse impact to daylight and sunlight amenity?

VSC

- 4.105 All five windows falling short of BRE criteria are positioned on the southern side of the building. The windows will experience minor VSC alterations between 24.4% and 29% (against a BRE recommendation of 20%) and will retain high VSC values between 22.8% and 26.9%.

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5 OVERSHADOWING ASSESSMENT

This section details the overshadowing impacts in relation to the relevant amenity spaces neighbouring the Site.

- 5.1 In addition to the assessment of windows and rooms, GIA have also considered the overshadowing affect that the Proposed Development has upon the external amenity spaces at Rowlock House, Caxton House and private gardens are 14-20 (even) St Stephen Street, We have used the overshadowing methodology set out in the BRE Guidelines, denoted as Sun Hours on Ground ('SHOG').
- 5.2 Section 3.3.17 of the BRE Guidelines states; *"It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on the 21st March. If, as a result of new development, an existing garden or amenity area does not meet the above and the area which can receive two hours of sun on the 21st March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21st March".*
- 5.3 In the existing scenario, all amenity spaces assessed receive high levels of direct sunlight on the 21st March in excess of 50%. Upon implementation of the Proposed Development, the SHOG assessment indicates that all amenity spaces considered will continue to receive at least two hours of direct sunlight on the 21st March to more than 50% and will therefore satisfy BRE criteria for overshadowing.

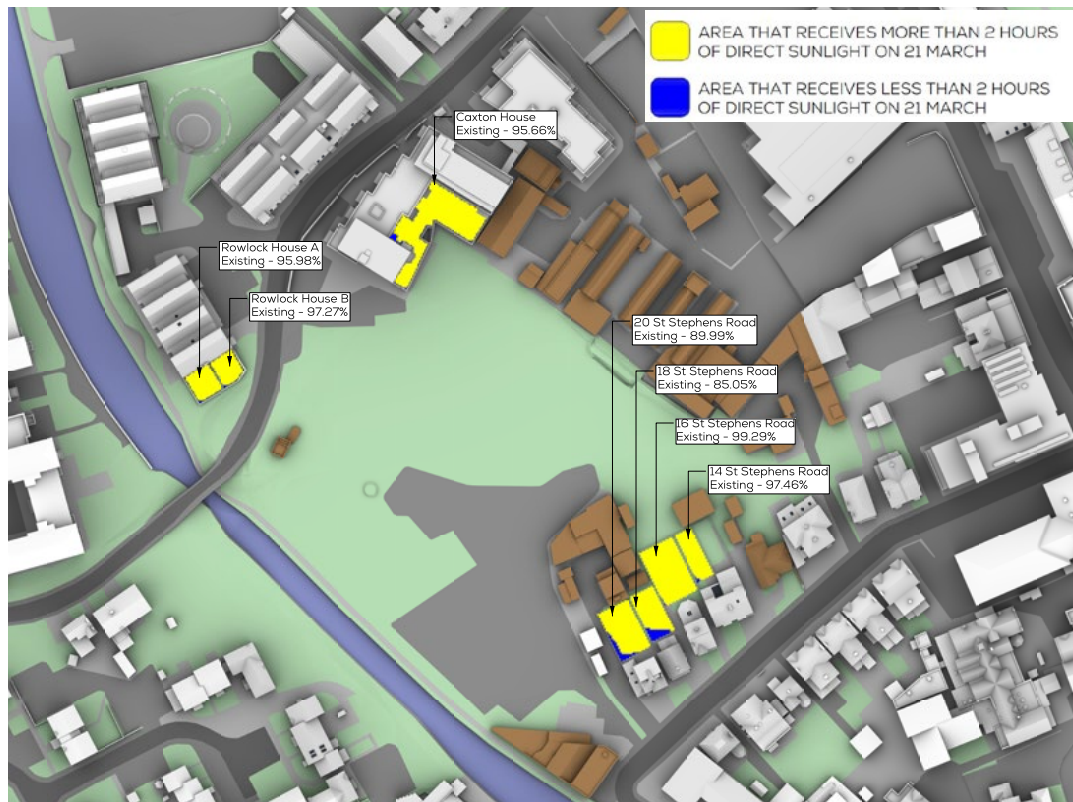


Figure 06: Existing Overshadowing Assessment



Figure 07: Proposed Overshadowing Assessment

6 CONCLUSIONS

GIA have undertaken a daylight, sunlight and overshadowing assessment in relation to the Proposed Development at Rainbow and Kirby Industrial Estates, Trout Road, Yiewsley. The technical analysis has been undertaken in accordance with the BRE Guidelines.

- 6.1 When constructing buildings alterations in light to adjoining properties are often unavoidable and the numerical guidance given in the BRE document can be treated flexibly in consideration of site specifics.
- 6.2 It is important to highlight that the Site is underdeveloped with the neighbouring properties sitting within a very close proximity to the site boundary. This means that it is inevitable for some degree of change in light condition to occur for this Site to be developed. In some instances, these effects are further compounded by the architectural features of a number of receptors, namely overhanging balconies, which serve to self-limit the amount of light which can be achieved to the rooms beneath. These factors combine to make 'BRE compliance' difficult to achieve.
- 6.3 Nonetheless, the Proposed Development produces good compliance rates of 74% for VSC, 80% for NSL (daylight) and 91% for APSH (sunlight). Where room layouts are known, NSL alterations are generally considered minor in nature or rooms have been identified as bedrooms which the BRE considers *"less important"*.
- 6.4 Where alterations in VSC do occur, retained VSC values are typically within the mid-teen range. In the 2018 Whitechapel Estate appeal (APP/E5900/W/17/3171437), mid-teens were considered to be a reasonable alternative benchmark in urban areas, with some retained levels falling into the lower bands. This reasoning has been upheld in many subsequent appeal cases, to the extent that it is now a widely accepted alternative target for an urban location.
- 6.5 Where windows retain lower daylight levels, this is a result of the self-limiting design of the neighbouring properties (overhanging balconies/roofs and recessed windows). Whilst balconies are used to provide occupants with an external sense of amenity, they will also have a detrimental effect on internal daylight amenity. This is consciously done on apartment dwellings and is seen as a necessary and acceptable trade off when considering amenity in the round. In undertaking the no balconies assessment in accordance with para.2.2.13 of the BRE Guidelines, we have demonstrated that it is the contextual constraints presented by the design of the neighbouring properties which exaggerates daylight alterations in most cases.
- 6.6 We have also conducted overshadowing assessments upon the amenity spaces at Rowlock House, Caxton House and private gardens at 14-20 (even) St Stephen Street. All amenity spaces considered will satisfy BRE criteria for overshadowing.
- 6.7 There will be an expectation for change to daylight and sunlight in this location given the Site's allocation and that it is on the fringe of the Yiewsley and West Drayton Town Centre (Hillingdon Local Plan 2020).
- 6.8 Having considered the Proposed Development in the context of local and national policy and guidance, it is our view that the daylight and sunlight impacts arising from the proposal do not give rise to adverse impacts upon daylight and sunlight amenity.

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What we do:

Building Surveying
Daylight & Sunlight
Light Obstruction Notices
Measured Surveys
Party Wall & Neighbourly Matters
Rights of Light
Solar PV
Wind Analysis

Where we are:

Belfast
Birmingham
Bristol
Dublin
London
Manchester