

James Latter  
Harper Latter Architects  
Common Ground  
Hill Place House  
55A High Street  
London SW19 5BA

02 June 2023

By email only: james@harperlatterarchitects.co.uk

Dear James,

**Re: ROL01122 – Flat 18, Sovereign House, 1 Draxmont, London SW19 7PG – Daylight and Sunlight – Planning Statement**

Anstey Horne have been instructed to consider the daylight and sunlight position associated with the proposed extension of Flat 18, Sovereign House, 1 Draxmont. We have considered the position in relation to the existing neighbouring properties in the vicinity of the site, and the immediately adjacent property at Flat 17 Sovereign House.

In the first instance, we reviewed the relevant planning policy and guidance and set out the relevant extracts below. We then considered the drawings of the proposed extension received from Harper Latter Architects on 24 May 2023 alongside site photos of the front and rear elevations and aerial imagery in order to form a view on the daylight and sunlight position.

**Planning Policy and Guidance**

**National Planning Policy and Guidance**

The Revised National Planning Policy Framework (revised July 2021, Department for Communities and Local Government) sets out the Government's planning policies and how these are expected to be applied. It provides a framework within which councils can produce their own local plans that reflect the needs and priorities of their communities.

In terms of daylight and sunlight, under section 11 'Making effective use of land', paragraph 123(c) states that:

*“local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, 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).”*

The Building Research Establishment, whose aims include achieving a higher quality built environment, publish BRE guidelines 209, Site Layout Planning for Daylight and Sunlight: A guide to good practice (third edition, 2022) by PJ Littlefair. This guide gives advice on site layout planning to retain good daylighting and sunlighting in existing surrounding buildings and achieve to it in new buildings. The guide is intended for use by designers, consultants and planning officials and notes that:

*“The advice given here is not mandatory and this document should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer.”*

The BRE guidelines also sets out the following in respect of existing buildings and the room uses which should be considered:

*“The guidelines given here are intended for use for rooms in adjoining dwellings where daylight is required, including living rooms, kitchens, and bedrooms. Windows to bathrooms, toilets, storerooms, circulation areas, and garages need not be analysed. The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops, and some offices.”*

#### Regional Planning Policy and Guidance

London Plan March 2021

The Mayor of London’s London Plan March 2021 sets out the spatial development strategy for London. It forms part of the development plan for Greater London, along with local plans of the London boroughs.

Policy D6 Housing quality and standards states the following:

*“D. The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.”*

#### Local Planning Policy and Guidance

The development site is located within the London Borough of Merton.

Merton Council is currently creating a New Local Plan which will replace the Merton’s adopted borough-wide Local Plan (the Core Planning Strategy 2021 and Sites and Policies Plan 2014) under the draft New Local Plan Stage 3: Whole Local Plan: Chapter 01A Introduction - states that daylight and sunlight should be protected to neighbouring properties:

Strategic Policy D12.1 - Delivering well designed and resilient neighbourhoods.

- d. Ensure that the site of the development is appropriate for its proposed function and use through the analysis of site constraints such as air quality, noise pollution, land contamination, flooding (from all sources) and daylight and sunlight.

**The Proposed Scheme**

The design information provided to us indicates that the proposed extension of 18 Sovereign House entails the addition of single storey massing to both the front and rear of the property which is located on the fourth floor of Sovereign House. The front extension will be an infill of the current terraced area to provide a breakfast room. The rear extensions are located mid-elevation and in the south-east corner of the building. The mid-elevation extension will provide a master bedroom which is slightly offset from the boundary with Flat 17 Sovereign House and the south-east extension will provide a conservatory separated from the master bedroom by a terraced area. The proposed massing changes are indicated in red at Figure 1 below:

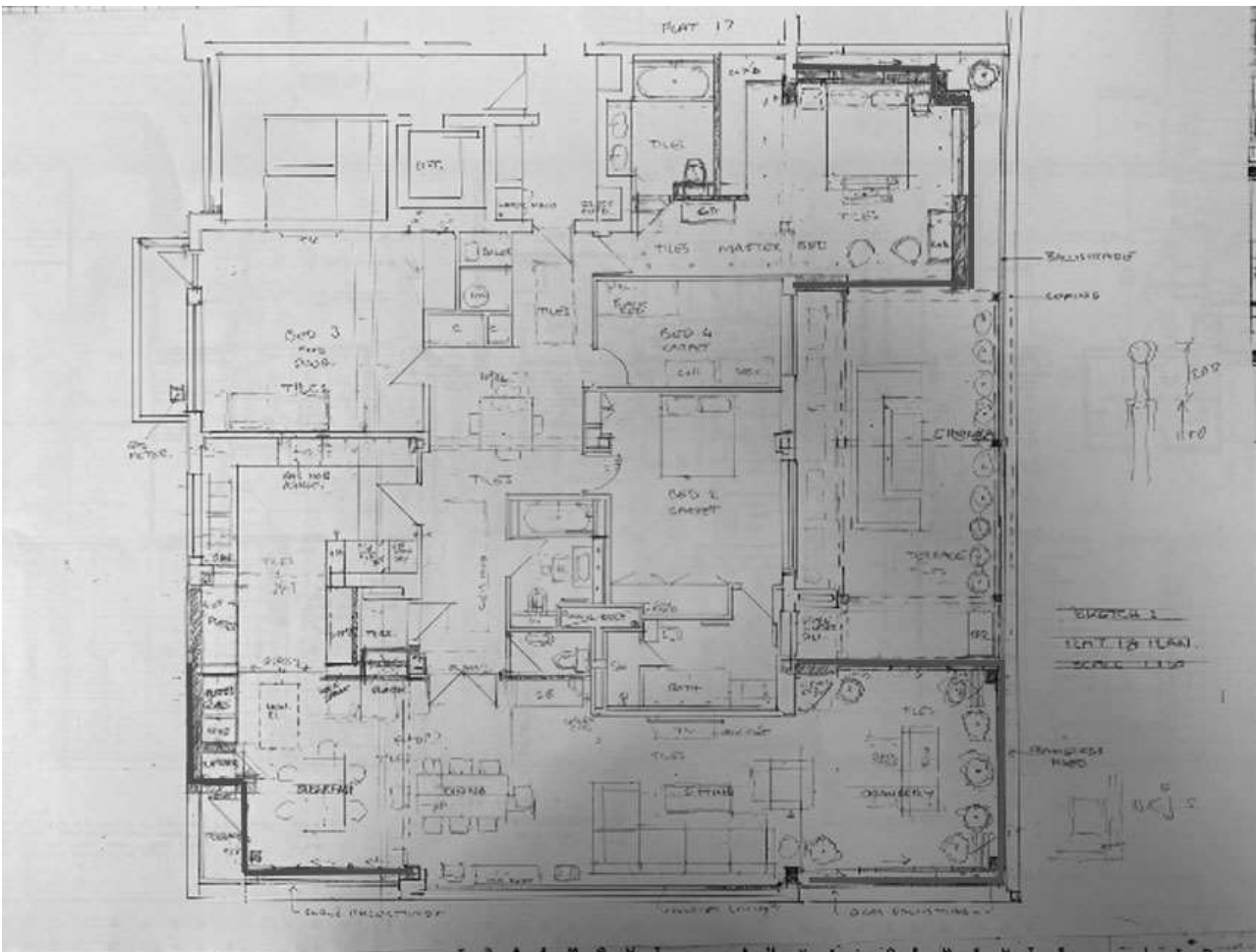


Figure 1: Proposed Site Plan – Rear and front extension outlined in red

**Desktop review and findings**

Having reviewed the site in the context of the proposed drawings, we have identified the neighbouring properties at Sussex House, Keswick House, Grosvenor Court and Flat 17 Sovereign House to contain residential content. The location of each of these properties is indicated at Figure 2 below:



Figure 2: Boundary of Flat 18, Sovereign House in red and orange arrows pointing to neighbouring properties

### **Desktop review**

From our desktop review, we can confirm that the proposed extension is unlikely to result in any noticeable reduction to the daylight and sunlight availability to the adjoining neighbouring properties.

In respect of the neighbouring properties at Sussex House and Keswick House, the separation distance between these properties and the development site is generous (over 15m) and they are also positioned at a lower level. Furthermore, both properties appear to have a thick line of trees along the boundary with Sovereign House. On this basis, these properties will have a very limited view of any small changes to the massing at fourth floor level.

Turning to Grosvenor Court, again there is a material separation distance between the neighbouring property and the development site (over 20m). The position of Grosvenor Court is offset to the south of Sovereign House as opposed to directly opposite and therefore this property will continue to enjoy daylight and sunlight from the south-east.

In relation to Flat 17 Sovereign House, this property is located to the north-east of the development site and is also at fourth floor level. It should be noted that the property has a consented planning application (ref: 19/P1593) to re-configure the internal layouts and therefore we have considered the daylight and sunlight position in respect of both the existing and proposed layouts.

Firstly, it is worth noting that Flat 17 will not have a view of the proposed corner extensions at either the front or the rear of the property. In the existing condition, Flat 17 has one south facing window which faces the proposed mid-elevation extension serving a conservatory and another east facing window abutting the proposed mid-elevation extension serving a bedroom. These windows will remain in the same locations in the proposed condition, however the internal layouts will be reconfigured so that they will serve a living/dining room and a study. The living/dining area will continue to be tri aspect, with its primary window facing south-east. Therefore, this room will continue to receive high levels of daylight and sunlight with the proposed extension in place. The study window faces south-east and will therefore only have an oblique view of the proposed extension. It is worth noting that the mid-elevation extension will be located behind the wall which currently divides the two flats, and therefore any view of the extension itself will be limited. It is also worth bearing in mind that Flat 17 Sovereign House is a penthouse located on the top floor of the building where there is limited obstruction therefore it will inherently receive good levels of daylight and sunlight.

**Conclusion**

In conclusion, the layout of the proposed extension follows the BRE guidelines and is unlikely to result in a noticeable reduction in daylight or sunlight to the existing surrounding residential properties. In our opinion, the London Borough of Merton’s planning policy on daylight and sunlight to neighbouring properties will be satisfied.

We trust the above provides a useful summary of the position.

Yours sincerely

.....  
Anstey Horne

02 June 2023

This page is intentionally left blank