

James Latter  
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55A High Street  
London SW19 5BA

13 February 2023

By email only: james@harperlatterarchitects.co.uk

Dear James

**Re: ROL01122 – 18 Sovereign House, 1 Draxmont, London –Daylight and Sunlight Assessment**

Anstey Horne has been instructed by Sue Thompson to consider the daylight and sunlight position associated with the proposed development at Flat 18, Sovereign House, 1 Draxmont in respect of immediately adjacent property at Flat 17 Sovereign House.

We understand that the proposals for the development site include 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.

In the first instance, we have reviewed the relevant planning policy and guidance and set out the relevant extracts below. We then provide a summary of the BRE Methodology for considering the impacts on neighbouring properties, before discussing the results of the technical assessments.

**Planning Policy and Guidance**

**National Planning Policy and Guidance**

The Revised National Planning Policy Framework (revised December 2023, 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 129 (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."*

## Local Planning Policy and Guidance

The development site is located within 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 states that to achieve this, development should:

*"...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..."*

Strategic Policy D12.3 - Ensuring high quality design for all developments states that proposals for all development should:

*“... f. Provide appropriate levels of sunlight and daylight, quality of living conditions, amenity space and privacy, to both proposed and adjoining buildings and gardens...”*

## **BRE methodology**

### *Daylight*

There are two tests which the BRE guidelines recommend for assessing daylight in neighbouring properties. Those are to be calculated in the existing condition i.e. before the development is in place, and the proposed condition i.e. with the development in place. This allows the difference in light levels between the two scenarios to be quantified. The two tests are vertical sky component (VSC) which assesses the daylight availability at the centre point of the window, and daylight distribution (DD) which assesses the distribution of the light within the room. For VSC, the guide recommends either a retained value of greater than 27%, or that any reduction in light should be no more than 20% i.e. 0.8 times its former value. For DD, the distribution of light should not be reduced to less than 0.8 times its former value. The BRE recommends that these two tests are considered in parallel.

### *Sunlight*

The BRE guidelines recommend assessing the annual probable sunlight hours (APSH) and winter probable sunlight hours (WPSH) to determine whether the windows/rooms receive the guideline values for sunlight. The guidelines suggests that sunlight may be adversely affected if the centre of the window a) receives less than 25% APSH, including 5% during the winter months, b) sunlight in either period is less than 0.8 times former value and c) reduction in APSH is greater than 4%.

In respect of neighbouring amenity areas, the BRE guidelines recommend assessing the sunlight availability using the two hour sun on ground (SOG) test. The guidelines suggest that sunlight to an amenity space may be adversely affected if the area which receives two hours of sunlight on 21 March is a) reduced to less than 50% and b) reduced to less than 0.8 times former value.

## **Results of technical assessment**

We have assessed the window and habitable rooms within the neighbouring property at 17 Sovereign House which face onto the proposed rear extension at 18 Sovereign House. We have therefore tested a total of 6 windows serving 3 rooms. We have assessed a single window serving the study (W1), a single window serving the bedroom (W2) and four windows serving the main living room (W3-W6). It is worth noting that only W1-W3 will have any view of the development proposals. The internal layouts have been based on plan information obtained under planning application number 19/P1593. The 3D views of the model in the existing and proposed condition for the assessment are included at Appendix A and the results of the assessments are included at Appendix B.

The assessment confirms that there are very small reductions in VSC to the 3 windows closest to the extension (W1-W3) however, all 6 of the windows assessed exceed the BRE's absolute guideline for VSC, achieving VSC values of between 28.99% and 36.49%. This therefore indicates that the windows will continue to enjoy excellent levels of daylight with the proposed development in place. In respect of daylight distribution, the results confirm that there will be no reduction in lit area to any of the rooms assessed as a result of the proposed development.

In terms of sunlight availability to the neighbouring rooms, the assessment confirms that there will be a very small reduction in sunlight availability to the study, and no reduction in sunlight availability to either the living room or the bedroom. All three of the rooms assessed are shown to exceed the guideline values in the proposed condition, achieving annual APSH values of between 57% and 84% against the guideline of 25%, and achieving winter values of between 14% and 21% against the guideline of 5%. These rooms will therefore continue to enjoy high levels of sunlight availability with the proposed development in place.

Finally, in respect of the sunlight availability to the terrace amenity space, the assessment confirms that this space receives 2 hours of sunlight to 79.13% of its area in the proposed condition (reduced from 79.35% in the existing condition). The amenity space therefore continues to enjoy sunlight to well in excess of 50% of its area, as recommended by the BRE guidelines.

## Summary

In summary, the assessment demonstrates that the neighbouring property at 17 Sovereign House will experience some very small reductions in daylight and sunlight as a result of the proposed development, however, these reductions will be well within the BREs guideline values. Therefore, in our opinion London Borough of Merton's planning policy on daylight and sunlight to neighbouring properties will be satisfied.

We trust this provides a useful overview in respect of the daylight and sunlight levels associated with the proposed development at 18 Sovereign House.

If you have any immediate queries, please do let us know.

Yours sincerely



.....  
Anstey Horne

13 February 2023

**APPENDIX A**

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PLAN AND 3D VIEWS OF THE COMPUTER MODEL  
ROL01122\_R01\_V01\_3D-001 to 006



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CLIENT: SUE THOMPSON

PROJECT: 18 SOVEREIGN HOUSE  
 TITLE: DRAXMONT, SW19 7PG

SCHEME REF: SCHEME RECEIVED: 06/02/24

DRAWING TITLE: 3D MASSING MODEL VIEW  
 TITLE: EXISTING CONDITION

MODIFIED BY/DRAWN BY: DATE: SCALE: 1:200 A3  
 BSJK 13/02/24

PROJECT No.: RELEASE No.: VERSION No.: DRAWING No.:  
 ROL01122\_R01\_V01\_001

3D Massing Model



DRAXMONT

**LEGEND:**

-  Existing
  -  Proposed
  -  Consented
  -  Cutback
- AOD Height (mm)

**SOURCES OF INFORMATION:**

**EXISTING, SURROUNDING & ANALYSED BUILDINGS**

**LAND SURVEYOR**  
 Received on 18/02/24

Site and aerial photos.

**PROPOSED BUILDINGS**

**HARPER LATTER ARCHITECTS**  
 Received on 18/02/24

**PROJECT INFORMATION**

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**CLIENT:** SUE THOMPSON

**PROJECT:** 18 SOVEREIGN HOUSE

**TITLE:** DRAXMONT, SW19 7PG

**SCHEME REF:** SCHEME RECEIVED: 06/02/24

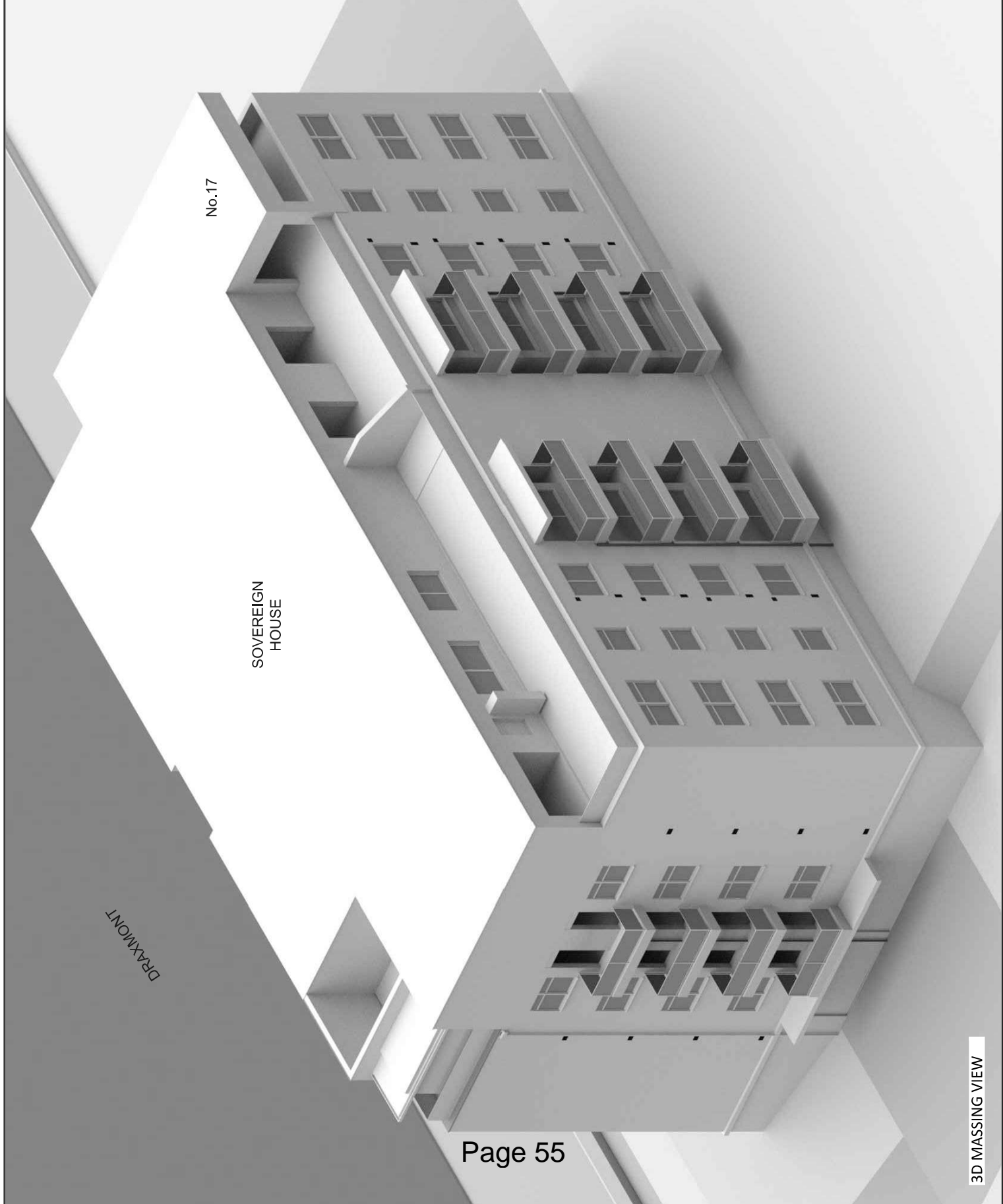
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**TITLE:** EXISTING CONDITION

MODELLED BY/DRAWN BY: BSJK DATE: 13/02/24 SCALE: N.T.S. **A3**

PROJECT No.: RELEASE No.: VERSION No.: DRAWING No.:

ROL01122\_R01\_V01\_002



**LEGEND:**

-  Existing
  -  Proposed
  -  Consented
  -  Cutback
- AOD Height (mm)

**SOURCES OF INFORMATION:**

**EXISTING, SURROUNDING & ANALYSED BUILDINGS**

**LAND SURVEYOR**  
 Received on 18/02/24

Site and aerial photos.

**PROPOSED BUILDINGS**  
**HARPER LATTER ARCHITECTS**  
 Received on 18/02/24

**PROJECT INFORMATION**

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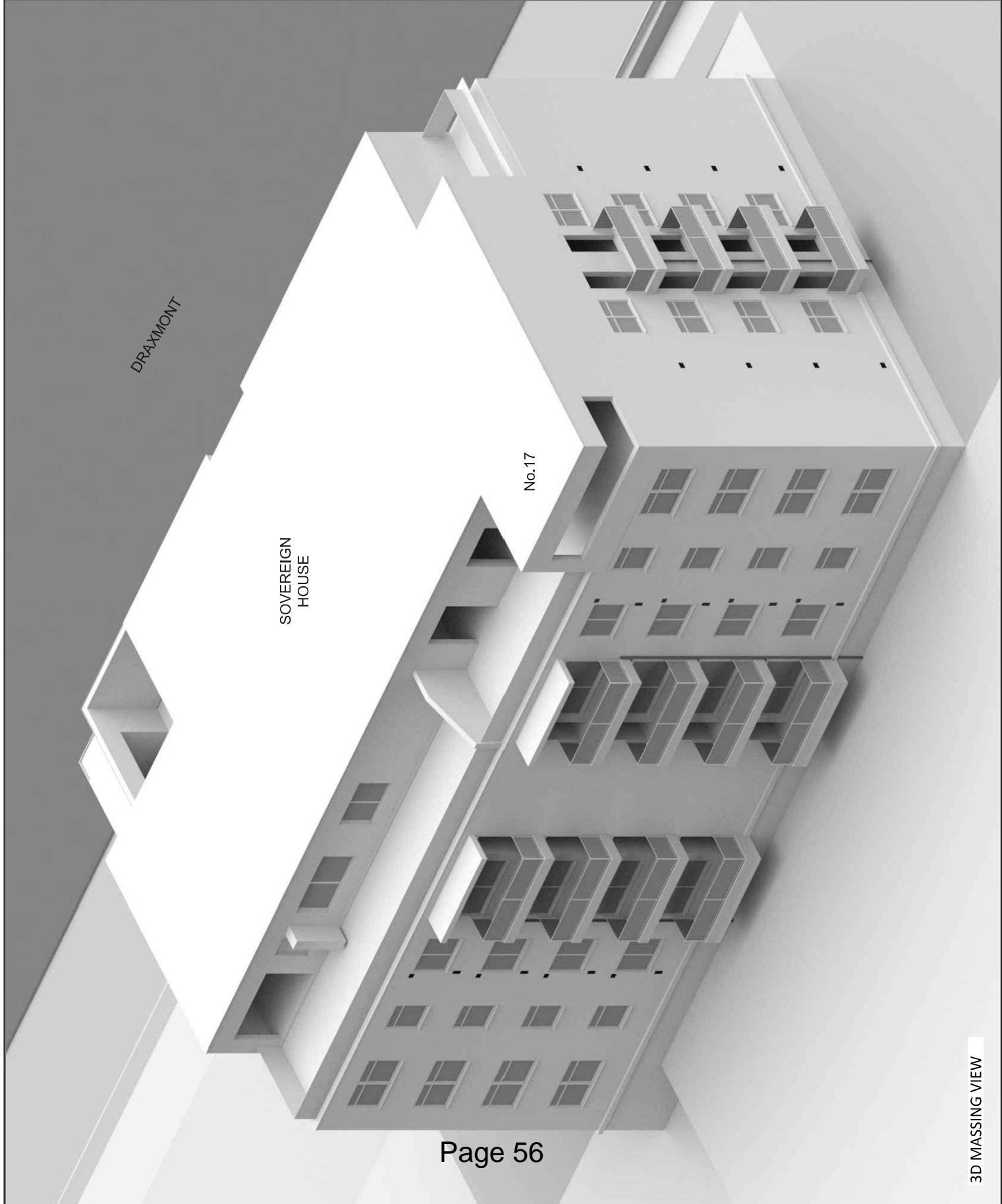
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**TITLE:** DRAXMONT, SW19 7PG

**SCHEME REF:** SCHEME RECEIVED: 06/02/24

**DRAWING TITLE:** 3D MASSING MODEL VIEW  
**EXISTING CONDITION**

MODIFIED BY/DRAWN BY: DATE: SCALE: N.T.S. **A3**

PROJECT No.: RELEASE No.: VERSION No.: DRAWING No.:  
**ROL01122\_R01\_V01\_003**





**LEGEND:**

	Existing		Consented
	Proposed		Cutback

AOD Height (mm)

**SOURCES OF INFORMATION:**

**EXISTING, SURROUNDING & ANALYSED BUILDINGS**  
**LAND SURVEYOR**  
 Received on 18/02/24  
 Site and aerial photos.  
**PROPOSED BUILDINGS**  
**HARPER LATTER ARCHITECTS**  
 Received on 18/02/24



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PROJECT: 18 SOVEREIGN HOUSE  
 TITLE: DRAXMONT, SW19 7PG

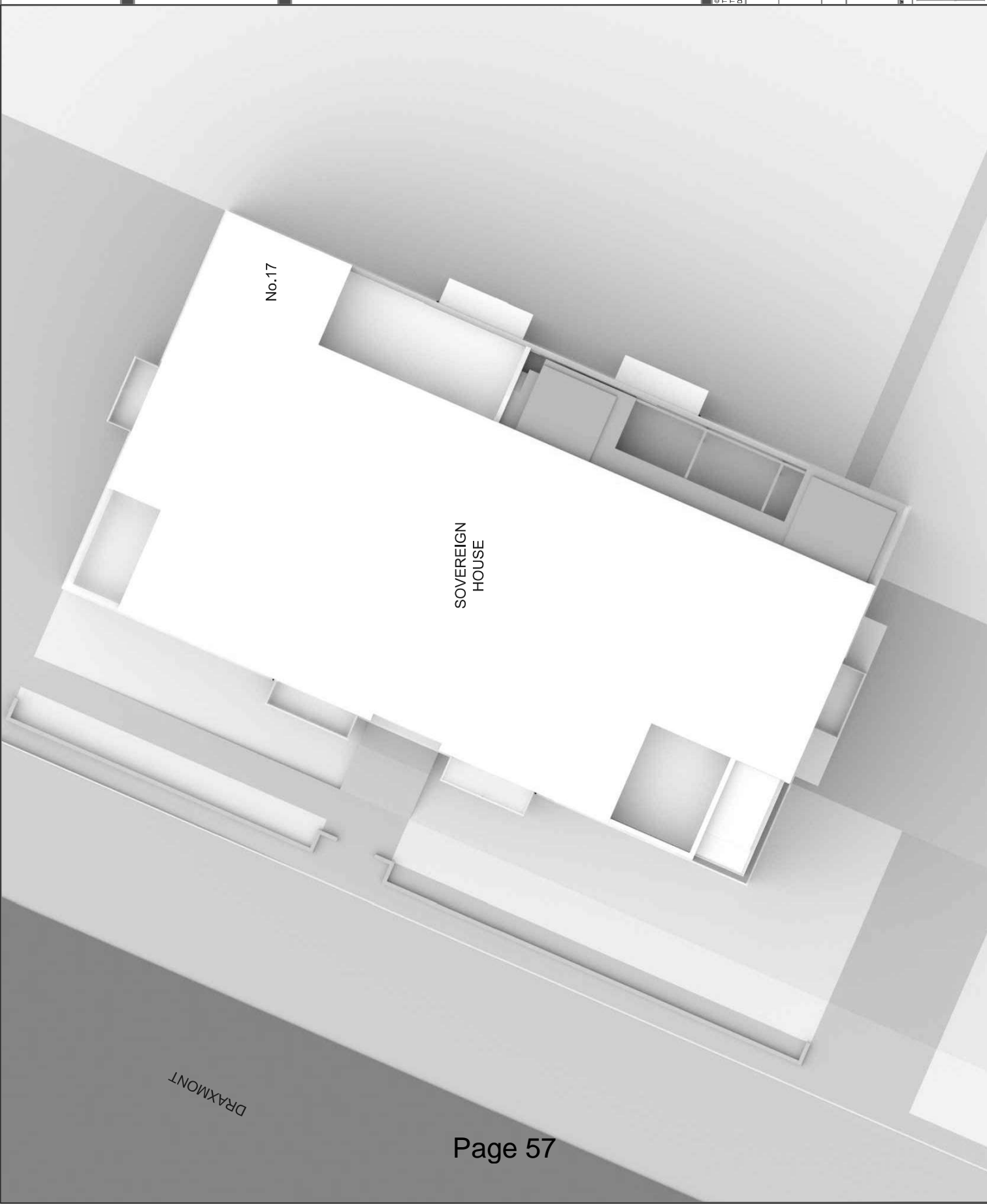
SCHEME REF: SCHEME RECEIVED: 06/02/24

DRAWING REF: 3D MASSING MODEL VIEW  
 TITLE: PROPOSED SCHEME

MODIFIED BY/DRAWN BY: DATE: 03/02/24 SCALE: 1:200 A3

PROJECT No.: RELEASE No.: VERSION No.: DRAWING No.:  
 ROL01122\_R01\_V01\_004

**3D Massing Model**



DRAXMONT

**LEGEND:**

- Existing
- Proposed
- Consented
- Cutback

AOD Height (mm)

No. 17

SOVEREIGN  
HOUSE

DRAXMONT

**SOURCES OF INFORMATION:**

**EXISTING, SURROUNDING & ANALYSED BUILDINGS**

LAND SURVEYOR  
 Received on 18/02/24

Site and aerial photos.

PROPOSED BUILDINGS  
 HARPER LATTER ARCHITECTS  
 Received on 18/02/24

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CLIENT: SUE THOMPSON

PROJECT: 18 SOVEREIGN HOUSE  
 TITLE: DRAXMONT, SW19 7PG

SCHEME REF: SCHEME RECEIVED: 06/02/24





DRAWING TITLE: 3D MASSING MODEL VIEW  
 TITLE: PROPOSED SCHEME

MODELER/DRAWN BY: BSJK DATE: 03/02/24 SCALE: 1:1.5 A3

PROJECT No.: RELEASE No.: VERSION No.: DRAWING No.:

ROL01122\_R01\_V01\_005

**LEGEND:**

-  Existing
  -  Proposed
  -  Consented
  -  Cutback
- AOD Height (mm)

**SOURCES OF INFORMATION:**

**EXISTING, SURROUNDING & ANALYSED BUILDINGS**

**LAND SURVEYOR**  
 Received on 18/02/24

Site and aerial photos.

**PROPOSED BUILDINGS**  
**HARPER LATTER ARCHITECTS**  
 Received on 18/02/24

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**CLIENT:** SUE THOMPSON

**PROJECT:** 18 SOVEREIGN HOUSE  
**TITLE:** DRAXMONT, SW19 7PG

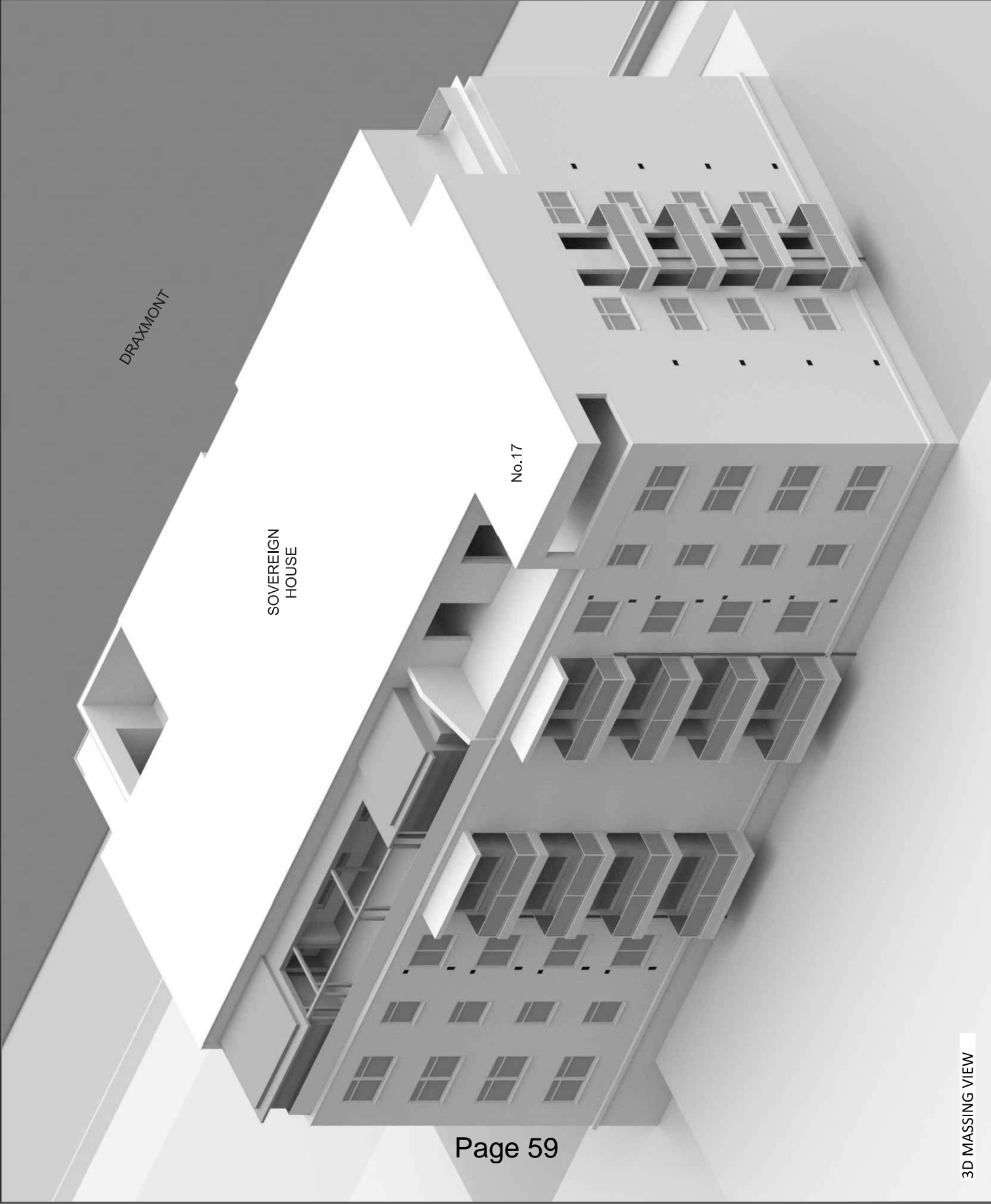
**SCHEME REF:** SCHEME RECEIVED: 06/02/24

**DRAWING TITLE:** 3D MASSING MODEL VIEW  
 PROPOSED SCHEME

**MODIFIED BY/DRAWN BY:** BSJK  
**DATE:** 03/02/24  
**SCALE:** N.T.S.  
**A3**

**PROJECT No. / RELEASE No. / VERSION No. / DRAWING No.:**  
 ROL01122\_R01\_V01\_006

**3D Massing Model**



**APPENDIX B**

-

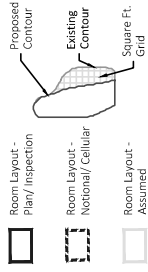
RESULTS OF TECHNICAL ASSESSMENTS – VSC, DD, APSH & SOG

TABLE P1  
 VERTICAL SKY COMPONENT (VSC)  
 SURROUNDING BUILDINGS

Property/ room ref.	Property type	Flat no.	Room usage	Window ref.	Existing VSC(%)	Proposed VSC(%)	*Factor of former value
<b>17 Sovereign House</b>							
<b>4th Floor</b>							
R1	RESIDENTIAL		STUDY	W1	36.54	36.49	N/A
R2	RESIDENTIAL		BEDROOM	W2	35.03	34.95	N/A
R3	RESIDENTIAL		LIVING ROOM	W3	30.68	30.49	N/A
R3	RESIDENTIAL		LIVING ROOM	W4	39.50	39.50	N/A
R3	RESIDENTIAL		LIVING ROOM	W5	39.50	39.50	N/A
R3	RESIDENTIAL		LIVING ROOM	W6	28.99	28.99	N/A

Property / room ref.	Property type	Flat no.	Room Usage	Room area (m <sup>2</sup> )	Existing lit area (m <sup>2</sup> )	Proposed lit area (m <sup>2</sup> )	*Factor of former value
<b>17 Sovereign House</b>							
<b>4th Floor</b>							
R1	RESIDENTIAL		STUDY	20.97	20.81	20.81	1.00
R2	RESIDENTIAL		BEDROOM	28.00	26.62	26.62	1.00
R3	RESIDENTIAL		LIVING ROOM	111.14	111.14	111.14	1.00

**LEGEND:**



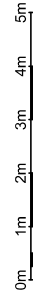
**SOURCES OF INFORMATION:**

**EXISTING, SURROUNDING & ANALYSED BUILDINGS**

LAND SURVEYOR  
Received on 18/02/24

Site and aerial photos.

PROPOSED BUILDINGS  
HARPER LATTER ARCHITECTS  
Received on 18/02/24



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CLIENT: SUE THOMPSON

PROJECT: 18 SOVEREIGN HOUSE  
TITLE: DRAXMOUNT, SW19 7PG

SCHEME REF: SCHEME RECEIVED: 06/02/24

DRAWING: DAYLIGHT DISTRIBUTION CONTOURS  
TITLE: 17 SOVEREIGN HOUSE

MODELER BY/DRAWN BY: DATE: 13/02/24 SCALE: 1:100 A3

PROJECT No.: RELEASE No.: VERSION No.: DRAWING No.:  
ROL01122\_R01\_V01\_101-01

Daylight & Sunlight

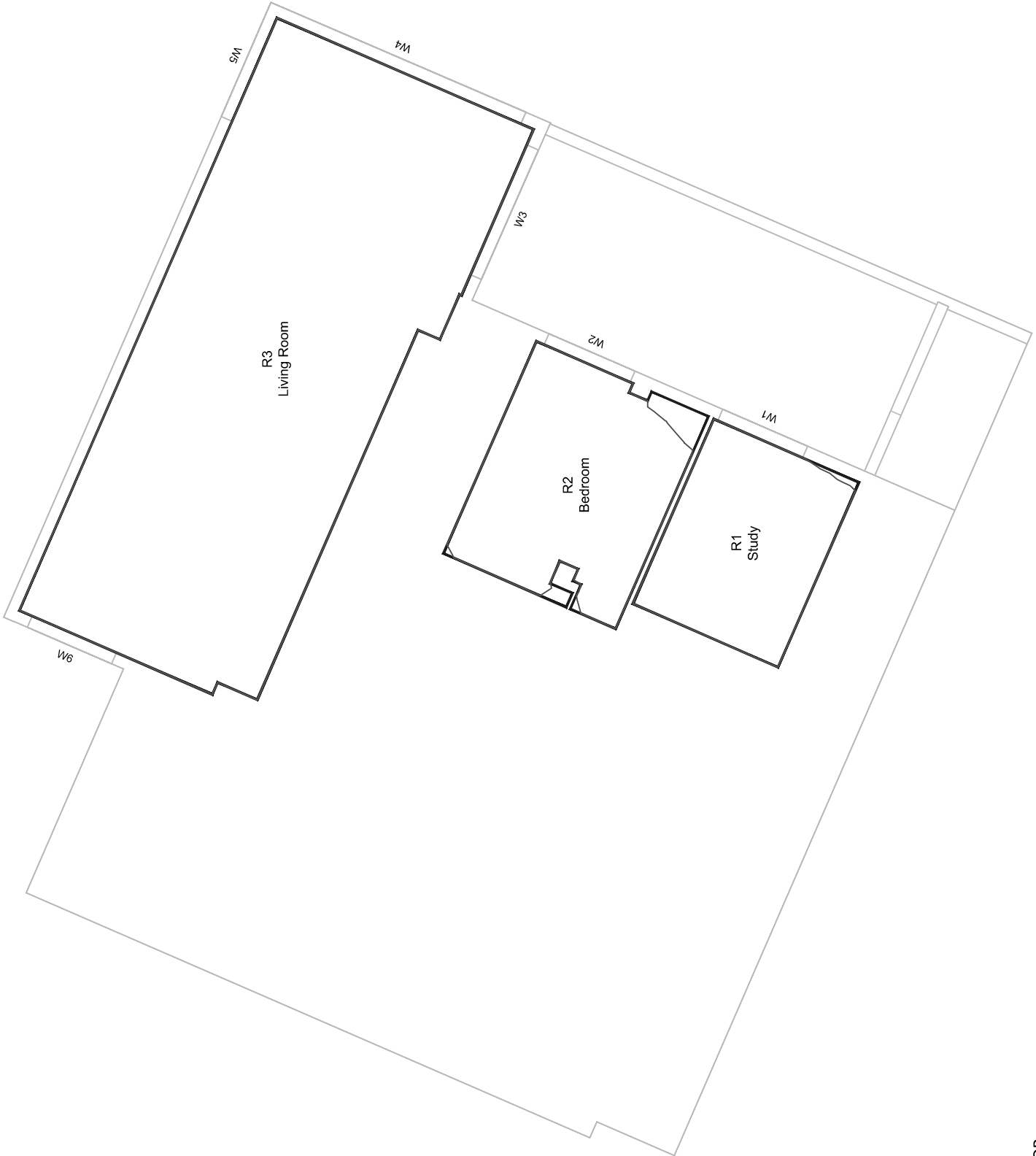




TABLE P3  
ANNUAL PROBABLE SUNLIGHT HOURS (APSH)  
SURROUNDING BUILDINGS

PROPERTY		WINDOW						ROOM					
		ANNUAL SUNLIGHT (%APSH)			WINTER SUNLIGHT (%APSH IN WINTER)			ANNUAL SUNLIGHT (%APSH)			WINTER SUNLIGHT (%APSH IN WINTER)		
Room ref.	Property type	Flat no.	Window ref.	Room use	Existing (%)	Proposed (%)	*Factor of former value	Existing (%)	Proposed (%)	*Factor of former value	Existing (%)	Proposed (%)	*Factor of former value
<b>17 Sovereign House</b>													
<b>4th Floor</b>													
R1	RESIDENTIAL		W1	STUDY	58	57	N/A	15	14	N/A	58	57	N/A
R2	RESIDENTIAL		W2	BEDROOM	61	61	N/A	21	21	N/A	61	61	N/A
R3	RESIDENTIAL		W3	LIVING ROOM	64	64	N/A	23	23	N/A	64	61	N/A
R3	RESIDENTIAL		W4	LIVING ROOM	64	64	N/A	21	21	N/A	64	61	N/A
R3	RESIDENTIAL		W5	LIVING ROOM	16	16	1.00	0	0	-	84	84	N/A
R3	RESIDENTIAL		W6	LIVING ROOM	3	3	1.00	0	0	-	84	84	N/A



**LEGEND:**

-  - Area receiving  $\geq$  2hr Sunlight on 21st March
-  - Area receiving  $<$  2hr Sunlight on 21st March
- X%** - Percentage of Amenity Space receiving  $\geq$  2hr Sunlight on 21st March

**SOURCES OF INFORMATION:**

**EXISTING, SURROUNDING & ANALYSED BUILDINGS**  
**LAND SURVEYOR**  
 Received on 18/02/24

**PROPOSED BUILDINGS**  
**HARPER LATTER ARCHITECTS**  
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Site and aerial photos.



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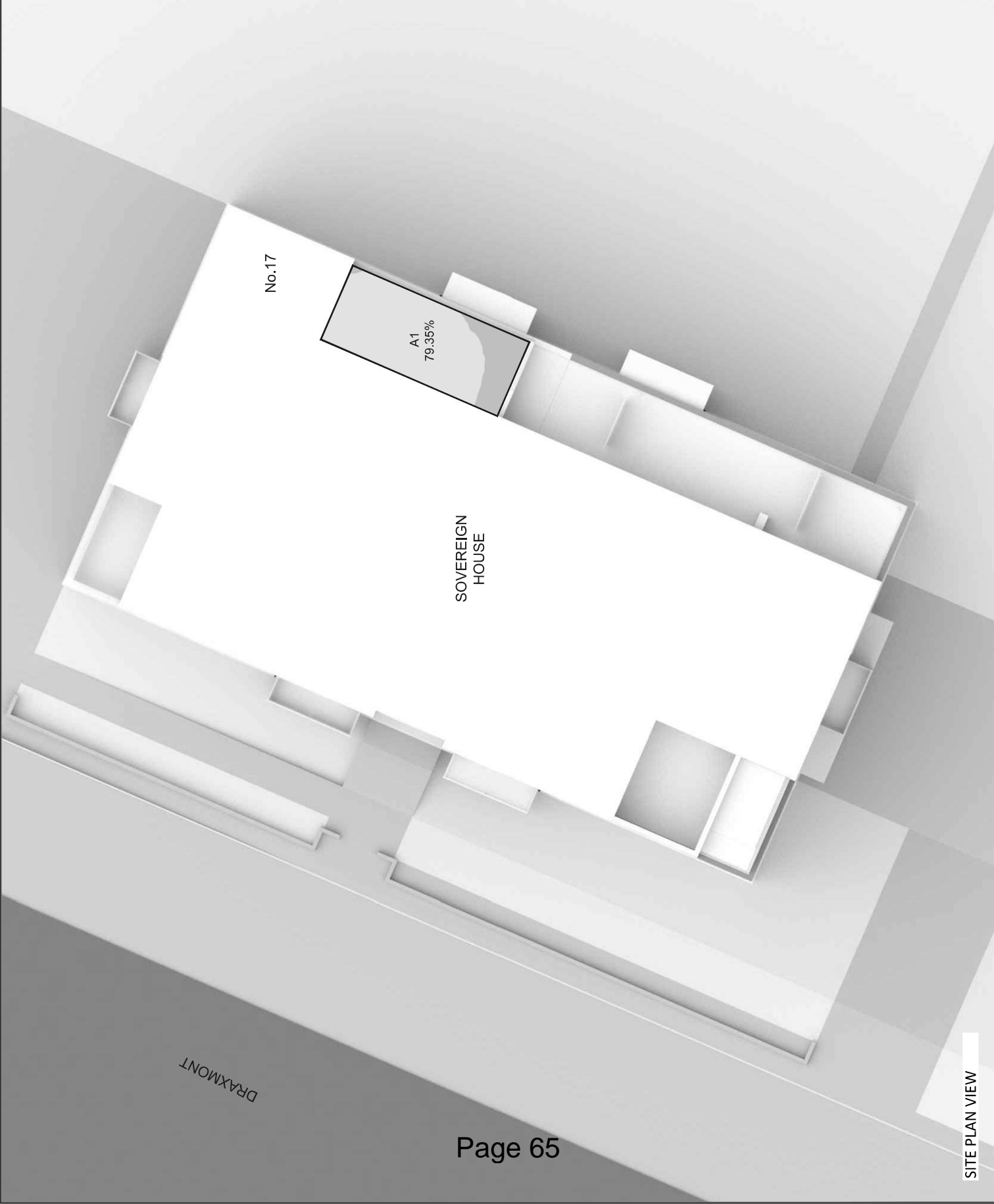
PROJECT: 18 SOVEREIGN HOUSE  
 TITLE: DRAXMONT, SW19 7PG

SCHEME REF: SCHEME RECEIVED: 06/02/24  
 DRAWING TITLE: TWO-HOUR SUNLIGHT TEST  
 EXISTING CONDITION  
 MARCH 21ST (GMT)

MODIFIED BY/DRAWN BY: DATE: 13/02/24 SCALE: 1:200 A3



PROJECT No. RELEASE No. VERSION No. DRAWING No.  
**ROL01122\_R01\_V01\_301-01**

**2Hr Sun-On-Ground**



DRAXMONT

**LEGEND:**

-  - Area receiving ≥ 2hr Sunlight on 21st March
-  - Area receiving < 2hr Sunlight on 21st March
- X%** - Percentage of Amenity Space receiving  
 ≥ 2hr Sunlight on 21st March

**SOURCES OF INFORMATION:**

**EXISTING, SURROUNDING & ANALYSED BUILDINGS**  
**LAND SURVEYOR**  
 Received on 18/02/24  
 Site and aerial photos.

**PROPOSED BUILDINGS**  
**HARPER LATTER ARCHITECTS**  
 Received on 18/02/24



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**CLIENT:** SUE THOMPSON

**PROJECT:** 18 SOVEREIGN HOUSE  
**TITLE:** DRAXMONT, SW19 7PG

**SCHEME REF:** SCHEME RECEIVED: 06/02/24

**DRAWING TITLE:** TWO-HOUR SUNLIGHT TEST  
**PROPOSED SCHEME:**  
 MARCH 21ST (GMT)

**MODIFIED BY/DRAWN BY:** BSJK  
**DATE:** 03/02/24  
**SCALE:** 1:200  
**A3**

**PROJECT No. / RELEASE No. / VERSION No. / DRAWING No.:**  
 ROL01122\_R01\_V01\_301-02

**2Hr Sun-On-Ground**

