



4th Floor, Holborn Tower
137-144 High Holborn
London
WC1V 6PL

T: +44(0)20 7148 6290
E: info@eb7.co.uk
W: eb7.co.uk

DAYLIGHT & SUNLIGHT REPORT

Sevenoaks Gasholder Site
Land to the south of Otford Road, TN14

Our Ref: 4577

16 March 2021

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Report details

Client: SGN Place Ltd

Prepared by: EK

Checked by: JB

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1 Introduction

- 1.1.1 eb7 have been instructed to assess the effect of proposed development at the Gasholder Site, Land to the South of Otford Road, on daylight and sunlight to the existing surrounding properties as well as the overshadowing impacts on neighbouring and proposed amenity spaces. These assessments consider the latest MAX Architects scheme proposals received February 2021.
- 1.1.2 The methodology and criteria used for these assessments is provided by Building Research Establishment's (BRE) guidance 'Site layout planning for daylight and sunlight: A guide to good practice' (BRE 209 2nd edition, 2011).
- 1.1.3 In order to carry out an assessment, we have generated a 3D computer model (Test Environment) of the existing site, the key surrounding properties and the proposed scheme. Using this model and our specialist software, we have calculated the daylight and sunlight levels in both the existing and proposed conditions for the relevant neighbouring buildings.
- 1.1.4 As well as considering the daylight and sunlight to neighbouring properties, we have also quantified the overshadowing effects to neighbouring amenity areas and gardens, again considering both the existing and proposed conditions.
- 1.1.5 As the proposed development includes residential accommodation, the daylight and sunlight to rooms within the proposal has also been considered by Skelly and Couch in a separate assessment.
- 1.1.6 The numerical criteria suggested within the BRE guidelines has been applied to each of the assessments mentioned above. It is important to note that these guidelines are not a rigid set of rules, but are advisory and need to be applied flexibly according to the specific context of a site.

2 Guidance

2.1 Daylight & sunlight for planning

'Site layout planning for daylight and sunlight: A guide to good practice', BRE 2011

- 2.1.1 The Building Research Establishment (BRE) Report 209, *'Site layout planning for daylight and sunlight: A guide to good practice'*, is the reference document used by most local authorities for assessing daylight and sunlight in relation to new developments. Commonly referred to as 'the BRE guidelines', it provides various testing methodologies to calculate the potential light levels received by neighbours of a development site and provided within proposed new development.

Detailed daylight assessments

- 2.1.2 The guidance outline three detailed methods for calculating daylight: the Vertical Sky Component (VSC), the No-Sky Line (NSL) and the Average Daylight Factor (ADF).
- 2.1.3 The VSC and NSL are primarily used for the assessment of existing buildings, while the ADF test is generally recommended for proposed rather than existing dwellings. The ADF may sometimes be useful as a supplementary analysis for existing buildings, particularly newer ones, and a number of local authorities request this as a standard measurement for impact assessments. It can help in judging whether an impact on daylight, which might otherwise be deemed 'noticeable', is nonetheless acceptable, when considered in the broader town planning context.
- 2.1.4 The VSC test measures the amount of sky that is visible to a specific point on the outside of a property, which is directly related to the amount of daylight that can be received. It is measured on the outside face of the external walls, usually at the centre point of a window.
- 2.1.5 The NSL test calculates the distribution of daylight within rooms by determining the area of the room at desk / work surface height (the 'working plane') which can and cannot receive a direct view of the sky and hence 'sky light'. The working plane height is set at 850mm above floor level within residential property.
- 2.1.6 For the above methods, the guidance suggests that existing daylight may be noticeably affected by new development if: -
- Windows achieve a VSC below 27% and are reduced to less than 0.8 times their former value; and / or
 - Levels of NSL within rooms are reduced to less than 0.8 times their former values.
- 2.1.7 Where rooms are greater than 5m in depth and lit from only one side, the

guidance recognises that “a greater movement of the no sky-line may be unavoidable” (page 8, paragraph 2.2.10).

Detailed sunlight assessments

- 2.1.8 For sunlight, the Annual Probable Sunlight Hours (APSH) test calculates the percentage of probable hours of sunlight received by a window or room over the course of a year.
- 2.1.9 In assessing sunlight effects to existing properties surrounding a new development, only those windows orientated within 90° of due south and which overlook the site require assessment. The main focus is on living rooms, with bedrooms and kitchens deemed less important.
- 2.1.10 The guidelines suggest that the main living rooms within new buildings should achieve at least 25% of annual sunlight hours, with 5% during the winter period. For neighbouring buildings, the guide suggests that occupiers will notice the loss of sunlight if the APSH to main living rooms is both less than 25% annually (with 5% during winter) and that the amount of sunlight, following the proposed development, is reduced by more than 4%, to less than 0.8 times its former value.

Sunlight to gardens and outdoor spaces

- 2.1.11 Where sunlight to an amenity space may be affected by new development, the BRE guidelines recommend that an overshadowing assessment is conducted. The key analysis is the ‘2hr sun on ground’ test, which quantifies the proportion of an amenity area (e.g. rear gardens, parks and playing fields, public squares etc.) receiving at least 2hrs of sun on the 21st of March.
- 2.1.12 The BRE guidance recognises that different types of amenity space may have different sunlighting requirements. Generally, the guidelines suggest that if at least 50% of an amenity area receives at least 2hrs of sun on 21st March, then it is likely to be adequately lit throughout the year. If an existing neighbouring open space receives less than 50%, then the guidelines suggest that it should not be reduced below 0.8 times its former value.

3 Application of the guidance

3.1 Scope of assessment

Impact analysis for neighbouring buildings

- 3.1.1 The BRE guidelines advise that, when assessing any potential effects on surrounding properties, only those windows and rooms that have a 'reasonable expectation' of daylight and sunlight need to be considered. At paragraph 2.2.2 it states: -

"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."

- 3.1.2 Our assessments therefore consider the neighbouring residential properties only, which the BRE recognises have the highest expectation for natural light. We have tested the impact on the main rooms in each residential property and ignored non-habitable space (e.g. staircases, hallways, bathrooms, toilets, stores etc.) as per BRE guidance.

3.2 Application of the numerical criteria

- 3.2.1 The opening paragraphs of the BRE guidelines state:

"The guide is intended for building designers and their clients, consultants and planning officials. 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... In special circumstances the developer or planning authority may wish to use different target values. For example, in a 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".

- 3.2.2 It is therefore very important to apply the BRE guidance sensibly and flexibly, with careful consideration of the specific site context. Its numerical targets theoretically apply to any built environment, from city centres to rural villages. However, in more tightly constrained environments, achieving the default BRE targets can be very challenging and conflict with other beneficial factors of site layout design.
- 3.2.3 With the above in mind, rigid adherence to the BRE in certain situations could easily result in an inappropriate form of development. In which case it may be appropriate to adopt lower target values more appropriate to the location

concerned. This is acknowledged in the BRE guidance at paragraph 2.2.3 (page 7):

“Note that numerical values given here are purely advisory. Different criteria maybe used, based on the requirements for daylighting in an area viewed against other site layout constraints.

- 3.2.4 For buildings that neighbour a new development, the guidance suggests that daylight will be adversely affected by the development, if either; its windows achieve a VSC below 27% and have their levels reduced to less than 0.8 times their former value, or the levels of NSC within rooms are reduced to less than 0.8 times their former values.
- 3.2.5 Some recent planning decisions by the Mayor of London and Planning Inspectorate have suggested that retained levels of daylight (VSC) between 10% and 20% can be considered acceptable for residential properties neighbouring new developments in Central London. Further to these decisions, recent guidance from the Mayor of London (Draft SPG ‘Good Quality Homes for Londoners’) suggests that residential properties in Central London can typically expect VSC values of between 13% and 18%. We have therefore assessed the severity of impacts to the neighbouring residential properties in light of this guidance.

Appendix F – Setting alternative target values

- 3.2.6 In certain situations, the BRE guidance suggests that alternative target values may be set for the assessment of daylight and sunlight to neighbouring buildings.

“F1 Sections 2.1, 2.2 and 2.3 give numerical target values in assessing how much light from the sky is blocked by obstructing buildings. These values are purely advisory and different targets may be used based on the special requirements of the proposed development or its location. Such alternative targets may be generated from the layout dimensions of existing development, or they may be derived from considering the internal layout and daylighting needs of the proposed development itself.”

“F5. A similar approach may be adopted in cases where an existing building has windows that are unusually close to the site boundary and taking more than their fair share of light. Figure F3 shows an example, where side windows of an existing building are close to the boundary. To ensure that new development matches the height and proportions of existing buildings, the VSC and APSH targets for these windows could be set to those for a ‘mirror-image’ building of the same height and size, an equal distance away on the other side of the boundary.”

- 3.2.7 As suggested above, alternative target values may be set where the context of development is of a dense urban scale, where new buildings need to match the height and proportions of other existing buildings or where neighbouring buildings are set very close to the boundary.

- 3.2.8 Where the neighbouring properties sit very close to the boundary, this is done by using a 'mirror image' of the neighbouring building as the baseline for an assessment of impact arising from a proposed development.

Assessment of dwellings with balconies

- 3.2.9 Care must be taken when assessing the impact of a development proposal upon neighbouring properties that have been provided with external overhanging or recessed balconies. These balconies are intended to provide additional outdoor amenity to the apartments, but they also inhibit the access to/potential for daylight and sunlight. The BRE guidance gives the following statements in this regard:

"2.2.11 - 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 impact on the VSC, and on the area receiving direct skylight (NSC). One way to demonstrate this would be to carry out an additional calculation of the VSC and the area receiving direct skylight for both existing and proposed situations without the balcony in place."

"2.2.12 - A larger relative reduction in VSC may also be unavoidable if the existing window has projecting wings on one or both sides of it, or if it is recessed into the building so that it is obstructed on both sides as well as above."

- 3.2.10 It is therefore often relevant and necessary to conduct assessments of the surrounding properties with their balconies omitted, so that the impact upon the potential for good daylight and sunlight can be fully understood. Full results of these assessments can be found in the appendix.

4 Planning Policy

- 4.1.1 We have considered local, regional and national planning policy relating to daylight and sunlight. In general terms, planning policy advises that new development will only be permitted where it is shown not to cause unacceptable loss of daylight or sunlight amenity to neighbouring properties.
- 4.1.2 The need to protect amenity of neighbours is echoed within recent publications from the Mayor of London and the Secretary of State for Housing, Communities and Local Government. Although, these documents also stress that current guidance needs to be used flexibly where developments are located in urban areas and intend to achieve higher densities. Specifically, these documents suggest that the nationally applicable criteria given within the BRE guidance needs to be applied in consideration of the development's context.

4.2 Sevenoaks District Council – Allocations and Development Management Plan (2015)

- 4.2.1 The Sevenoaks District Council Allocations and Deelopement Management Plan gives the following:

Policy EN2 – Amenity Protection

“Proposals will be permitted where they would provide adequate residential amenities for existing and future occupiers of the development and would safeguard the amenities of existing and future occupants of nearby properties by ensuring that development does not result in, and is not located in areas where occupiers of the development would be subject to, excessive noise, vibration, odour, air pollution, activity or vehicle movements, overlooking or visual intrusion and where the built form would not result in an unacceptable loss of privacy, or light enjoyed by the occupiers of nearby properties.”

4.3 The National Planning Policy Framework - Department for Housing, Communities and Local Government (June 2019)

- 4.3.1 The DCLG have produced a draft revised National Planning Policy Framework document (2018) which includes the following: -

11. Making effective use of land

Achieving appropriate densities

“123. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances: -

c) 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."

4.4 Appeal Decision for The Whitechapel Estate (Ref: APP/E5900/W/17/3171437) - The Planning Inspectorate (2017)

4.4.1 In his decision to overturn the Local Authority's reasons for refusal and to grant planning permission, the inspector commented on daylight and sunlight as follows:-

"112. 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, Islington⁴² 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 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."

"113. I acknowledge that a focus on overall residual levels could risk losing sight of individual problem areas. It is accepted that light is only one factor in assessing overall levels of amenity, but I consider that the trade-off with other factors, such as access to public transport or green space, is likely to be of more relevance to an occupier of new development than to an existing neighbour whose long-enjoyed living conditions would be adversely affected by new buildings. However, I also consider that Inner London is an area where there should generally be a high expectation of development taking place. This is particularly so in the case of the appeal site, where the WVM and the OAPF have flagged the desirability of high density development. Existing residents would in my view be prepared for change and would not necessarily expect existing standards of daylight and sunlight to persist after development."

"125. I conclude that the proposal would result in some significant individual reductions in daylight and sunlight levels, but that this is almost unavoidable in achieving the policy requirement for high density development in a confined urban setting. The new buildings would for the most part be comparable in height with the existing and would re-define traditional street frontages. Retained levels of daylight and sunlight would be adequate and comparable with existing and emerging urban conditions. The effects would appear very comparable with those recently allowed by the Council at Whitechapel Central."

There would be minimal adverse losses of outlook and increases in overlooking. Taken as a whole, the proposal would not result in unacceptably harmful effects on living conditions and would comply with the development plan in this respect."

5 Sources of Information & Assumptions

- 5.1.1 A 3D Measured Survey, 3D Architects model and 2D planning drawings have been used to create a 3D computer model of the proposed development in the context of the existing site and surrounding buildings.
- 5.1.2 Where survey or planning information was unavailable, the position of the neighbouring property elevations has been estimated based upon brick counts from site photographs. Window positions and dimensions used directly affect the results of all assessment methods.
- 5.1.3 We have not sought access to the surrounding properties and, unless we have been able to source floor layouts via public records, the internal configuration and floor levels have been estimated. Unless the building form dictates otherwise, we assume room depths of c. 4.2m for principal living space. Room layouts used directly affect the results of the NSL and ADF assessments.
- 5.1.4 Where possible neighbouring building use has been identified via online research, including Valuation Office Agency (VOA) searches, and/or external observation.
- 5.1.5 The full list of source of information used in this assessment is as follows: -

5.2 Cloud 10 Ltd

3D Measured Survey

Crampton's Road Sevenoaks_DISI-19-02-2021.dwg
Received 19/02/2021

Crampton's Road Sevenoaks_Amended additional line work 23-02-2021.dwg
Received 23/02/2021

Crampton's Road Sevenoaks_Amended additional line work 26-02-2021.dwg
Received 26/02/2021

5.3 MAX Architects

3D model & 2D drawings

Sevenoaks_Model_NB-SB-TH.dwg
Sevenoaks_Model_Rotunda.dwg
0330_3000.pdf
0330_3010.pdf
0330_3030.pdf
0330_3040.pdf
0330_3050.pdf
Received 15/02/2021

5.4 Churchman Thornhill Finch

2D Landscape Plan

Plan 20210303_Rev C.dwg

Received 10/03/2021

6 The Site and Proposal

- 6.1.1 The site is located at the Sevenoaks Gasholder site and currently contains a primarily vacant site, with one small low rise building. The proposals include Construction of a residential development consisting of 136no. dwellings, with new vehicular accesses from Otford Road and Cramptons Road, associated parking, landscaping, drainage, boundary treatments and earthworks.

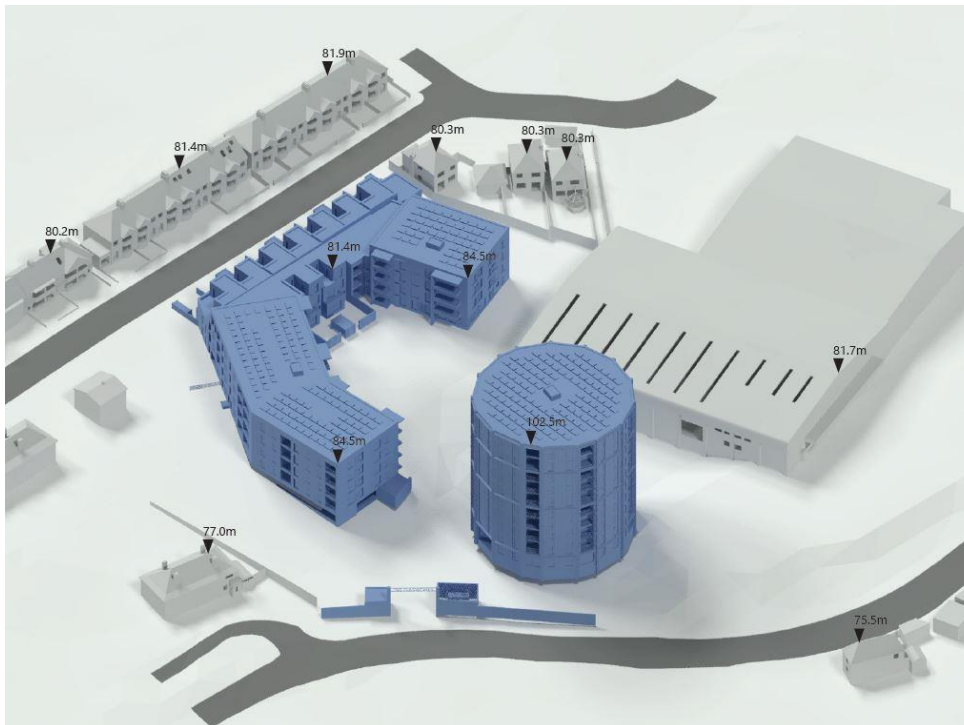


Image 1 - 3D view of the proposed development and context

7 Assessment results

7.1.1 Full results of the daylight and sunlight assessments are attached within Appendix 2. Drawings to show the existing and proposed buildings in the context of the neighbouring properties, are attached within Appendix 1.

7.2 Daylight and sunlight to neighbouring buildings

7.2.1 Our assessment has considered all of the closest neighbouring residential properties with windows with a view of the proposed development. These are shown on the following image: -

1. 114 Otford Road
2. 76-106 (evens) Crampton Road
3. 55-59 (odds) Crampton Road
4. Cherry Tree Cottage, Otford Road
5. 107 Crampton Road



Image 2 - Map showing site location and neighbouring residential properties

114 Otford Road



Image 3 - Front and flank facades of 114 Otford Road

7.2.2 This is a two-storey residential building located to the north of the site. The building will enjoy an oblique view of the proposal from the rear and a direct view from the south facing flank façade. Our understanding of the internal layouts is assumed.

Daylight

7.2.3 The results of the VSC assessment show that 6 out of the 7 windows assessed will see no noticeable reduction as a result of the proposed development. The one remaining window (W6 on the ground floor) sees a reduction to 25.7% VSC, marginally below the absolute target of 27%. This window will still retain high levels of daylight, in excess of 20% which has been considered as ‘good for an urban location’.

7.2.4 The NSL assessment for this property demonstrates that 6 out of the 7 rooms assessed within the property will see no noticeable reduction in daylight as a result of the proposed development. The remaining room, R4 on the ground floor is single aspect and looks directly to the south on to the proposed development. This room has a view directly over the currently vacant site, which has resulted in high levels of daylight in the existing scenario. This makes the receptor more susceptible to high proportional reductions in the proposed scenario. This room will see a proportional reduction of 34.5%, compared to the target of 20%, which is exacerbated by the vacant nature of the site. It is likely that any reasonable

development on this site would result in a similar or higher impact.

- 7.2.5 Overall, the impact to this property shows high compliance with the BRE guidance, with one window and room show an isolated deviation. This is driven by the vacant nature of the existing site, promoting high levels in the existing scenario and therefore result in minor deviations with good retained levels.

Sunlight

- 7.2.6 For sunlight, in accordance with BRE recommendations, it is only necessary to test site facing windows within 90° of due south. The results of the APSH assessment show full compliance with the BRE guidance.

76-106 (Evens) Cramptons Road



Image 4 - Front facades of 88-98 (evens) Crampton Road

- 7.2.7 These two-storey residential terraced buildings are located to the east of the site. These buildings will enjoy a direct view from their front west facing façades. Our understanding of the internal layouts is assumed, with the exception of nos. 80, 84, 88-92, 98 and 102, where planning or estate agent information was available online.

Daylight

- 7.2.8 The results of the VSC assessments demonstrates that all properties assessed will see not noticeable reduction in VSC and therefore are fully compliant with this test.
- 7.2.9 The NSL assessment shows that all properties, with the exception of nos. 88 and 90, will see no noticeable reduction in NSL as a result of the proposed development. Therefore the impact to these properties shows full compliance with the BRE guidance.
- 7.2.10 Nos.88 and 90 both see a minor reduction in NSL to one room each. Both rooms are the ground floor living / dining rooms and see proportional reductions of 24.1% - 25.8%, marginally above the target of 20%. These rooms are inherently deeper than a usual living room, being up to c.7m deep, with the dining room space being located at the rear. The BRE guidance states that where a room is deeper than 5m, "a greater movement of the no sky-line may be unavoidable" (page 8, paragraph 2.2.10). It should be noted that both rooms are served by large bay windows, with both properties showing full compliance with the VSC assessment.
- 7.2.11 Therefore, considering the minor and isolated deviations being driven by the self-constraining nature of the deep rooms, the overall impact on these properties is considered to be in line with the BRE guidance.

Sunlight

- 7.2.12 For sunlight, in accordance with BRE recommendations, it is only necessary to test site facing windows within 90° of due south. The results of the APSH assessment show full compliance with the BRE guidance.

55-59 (odds) Cramptons Road



Image 5 - Front facades of 55-59 (odds) Crampton Road

- 7.2.13 These two-storey residential terraced buildings are located to the south of the site. These buildings will enjoy an oblique view from their rear north west facing façades. Our understanding of the internal layouts is assumed, with the exception of no. 55 where partial planning information was available online.

Daylight

- 7.2.14 The results of the VSC and NSL assessments demonstrate that all properties with the exception of no.59, will see no noticeable reduction in VSC and NSL as a result of the proposed development. Therefore the impact to these properties shows full compliance with the BRE guidance.
- 7.2.15 No.59 would see a minor reduction in VSC to one flank window on the ground floor. The window in question (W2) serves a ground floor living room and would see a proportional reduction of 23.4%, marginally above the target of 20%, whilst still retaining 23.2% absolute VSC. It should be noted that the room in question is also served by another primary window on the south facing façade, which has no view if the proposal and will remain well in excess of the recommended targets. There will therefore be a minimal impact on the light within the room itself, which is shown by R1's full compliance with the NSL assessment.
- 7.2.16 Therefore, considering the minor and isolated deviation to a flank window, which is mitigated by the fully compliant primary window, the overall impact on these properties is considered to be in line with the BRE guidance.

Sunlight

- 7.2.17 For sunlight, in accordance with BRE recommendations, it is only necessary to test site facing windows within 90° of due south. The results of the APSH assessment show full compliance with the BRE guidance.

Cherry Tree Cottage



Image 6 - Front facades of Cherry Tree Cottage

7.2.18 This two-storey residential terraced building is located to the west of the site. This property enjoys a direct view of the site from front east facing façades. Our understanding of the internal layouts is assumed.

Daylight

7.2.19 The results of the VSC and NSL assessments demonstrate that all windows and rooms will meet the recommended targets and therefore would see no noticeable reduction in daylight as a result of the proposed development. Therefore the impact to this property shows full compliance with the BRE guidance.

Sunlight

7.2.20 For sunlight, in accordance with BRE recommendations, it is only necessary to test site facing windows within 90° of due south. The results of the APSH assessment show full compliance with the BRE guidance.

107 Crampton Road



Image 7 - Rear and flank façade of 107 Crampton Road

7.2.21 This two-storey residential terraced building is located to the east of the site. This property enjoys an oblique view of the site from the rear west facing façade and a direct view from the south facing flank facade. Our understanding of the internal layouts is assumed.

Daylight

7.2.22 The results of the VSC and NSL assessments demonstrate that all windows and rooms will meet the recommended targets and therefore will see no noticeable reduction in daylight as a result of the proposed development. Therefore the impact to this property shows full compliance with the BRE guidance.

Sunlight

7.2.23 For sunlight, in accordance with BRE recommendations, it is only necessary to test site facing windows within 90° of due south. The results of the APSH assessment show that 5 of the 7 rooms assessed show full compliance with the BRE guidance.

7.2.24 The two remaining rooms are referred to as R3 on the ground and first floors. These rooms see retained levels well in excess of the Annual APSH targets, with 41% and 32% respectively, compared to the target of 25%, however show marginal deviations of the Winter APSH targets. Both rooms achieve 4% APSH, marginally below the recommended target of 5%. These deviations are minor occur in the winter months when there is a lower expectation of direct sunlight in an urban context.

7.2.25 Therefore, considering the minor deviations to winter sunlight, the overall impact on

sunlight to this property is considered to be minor with regard to the suggestions set out in the BRE guidance.

7.3 Overshadowing to neighbouring amenity

7.3.1 We have assessed the scheme's potential effect on overshadowing using the 2-hour sun on ground / sunlight amenity assessment. This has considered the following amenity areas and opens spaces: -

- Rear Gardens of 107-111 (odds) Crampton Road
- Rear Gardens of 114-116 Otford Road

7.3.2 The results of the analysis are shown on our drawings labelled 4577-SA01 within Appendix 2.

Sunlight Amenity Assessment (2-hour sun on ground)

7.3.3 We have used the BRE recommended '2-hour sun contour' analysis. For both the existing and proposed scenarios, this involves dividing the areas that can receive at least two hours of sunlight on ground (shaded in yellow on the drawings) from those that receive less than two hours (shaded in blue) on 21 March (the equinox). The percentage of each amenity space receiving at least two hours sunlight is shown in the tables on the two drawings.

7.3.4 The results of the baseline assessment show that all rear gardens assessed, with the exception of 116 Otford Road, will experiences at least 2 hours of sun in the existing condition to over 50% of the area. 116 Otford Road achieves 2 hours of direct sunlight direct sunlight to 42% of the area and therefore is below the BRE recommendations.

7.3.5 In the proposed condition with the proposed development in place, all rear gardens will retain in excess of 0.8 times their former values on 21 March. As such, the BRE guidelines will be fully satisfied.

7.4 Overshadowing to proposed amenity within the Proposed Development

- 7.4.1 We have assessed the provision of direct sunlight within the proposed shared amenity spaces using the 2-hour sun on ground / sunlight amenity assessment. This has considered the main courtyard space.
- 7.4.2 The results of the analysis are shown on our drawings labelled 4577-SA02 within Appendix 2.

Sunlight Amenity Assessment (2-hour sun on ground)

- 7.4.3 We have used the BRE recommended '2-hour sun contour' analysis. For the proposed scenario, this involves dividing the areas that can receive at least two hours of sunlight on ground (shaded in yellow on the drawings) from those that receive less than two hours (shaded in blue) on 21 March (the equinox). The percentage of the amenity space receiving at least two hours sunlight is shown in the table on the attached drawing.
- 7.4.4 In the proposed condition with the proposed development in place, the proposed amenity space will receive 2 hours of direct sunlight to 87% of the area assessed on March 21. This is in excess of the recommended target of 50% and therefore shows full compliance with the BRE guidance.

8 Conclusions

- 8.1.1 This practice has undertaken a detailed assessment of the potential daylight and sunlight effects of the proposed development at the Gasholder Site to the east of Otford Road, Sevenoaks, on the key neighbouring properties. We have also undertaken an assessment of the impact on overshadowing to neighbouring amenity spaces.

8.2 Daylight and sunlight impact to neighbouring properties

- 8.2.1 Our assessments have been undertaken using the VSC and NSL (daylight) and APSH (sunlight) tests set out within the BRE guidance 'Site layout planning for daylight and sunlight: A guide to good practice' (2011). It is important to reiterate that alterations in daylight and sunlight to adjoining properties are often inevitable when undertaking any meaningful development, especially in an urban environment. Therefore, the BRE guide is meant to be interpreted flexibly because natural lighting is only one of many factors in site layout design. Indeed, the guidelines suggest that different criteria may be used based upon the requirements for natural lighting in an area viewed against other constraints.
- 8.2.2 The results of these tests have shown that high levels of overall compliance in daylight, with some isolated minor deviations. These deviations are primarily driven by the underdeveloped and vacant nature of the existing site or are caused by self-constraining features such as inherently deep rooms. The vacant and underdeveloped nature of the site results in unusually high levels of daylight in certain cases, which leaves the receptors more susceptible to high proportional reductions. These deviations are generally marginally beyond the targets and show high levels of retained daylight.
- 8.2.3 For sunlight, the assessments show all properties with the exception of one showing full compliance. The one exception to this, shows minor deviations in winter sunlight, where there is a lower expectation of direct sunlight.

8.3 Overshadowing impact to neighbouring properties

- 8.3.1 The assessment of sunlight amenity (overshadowing) within the rear gardens of 114-116 Otford road and 107-111 Crampton Road has shown that all gardens will retain at least 0.8 time their former value of direct sunlight and therefore are all considered in line with the BRE guidance.
- 8.3.2 The developments impact upon the neighbouring properties is therefore considered to be entirely consistent with the BRE guidance and relevant planning policy in terms of daylight and sunlight.

8.4 Overshadowing within the proposed amenity within the Proposed Development

- 8.4.1 The assessment of sunlight (overshadowing) within the proposed area of shared amenity space have shown that 87% of the amenity space will receive more than two hours of sunlight on 21st March and thereby in line with the BRE targets.



Appendix 1

Drawings of the existing, proposed and surrounding buildings

Sources of information

Cloud10

Crampton's Road Sevenoaks_DISI-19-02-2021.dwg
Received 19/02/2021
Crampton's Road Sevenoaks_Amend-
ed additional line work 23-02-2021.
dwg
Received 23/02/2021
Crampton's Road Sevenoaks_Amend-
ed additional line work 26-02-2021.
dwg
Received 26/02/2021
Crampton's Road Sevenoaks_Amend-
ed additional line work 02-03-2021.
dwg
Received 02/03/2021

MAX architects

Sevenoaks_Model_NB-SB-TH.dwg
Sevenoaks_Model_Rotunda.dwg
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0330_3030.pdf
0330_3040.pdf
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Received 15/02/2021

EB7 Ltd

Site Photographs
Ordnance Survey

Key:



Existing

NORTH



Project Sevenoaks SGN Projects

Title Existing Condition
Plan View

Drawn AD Checked

Date 05/03/2021 Project 4577

Rel no. 01 Prefix DS01 Page no. 01



Sources of information

Cloud10

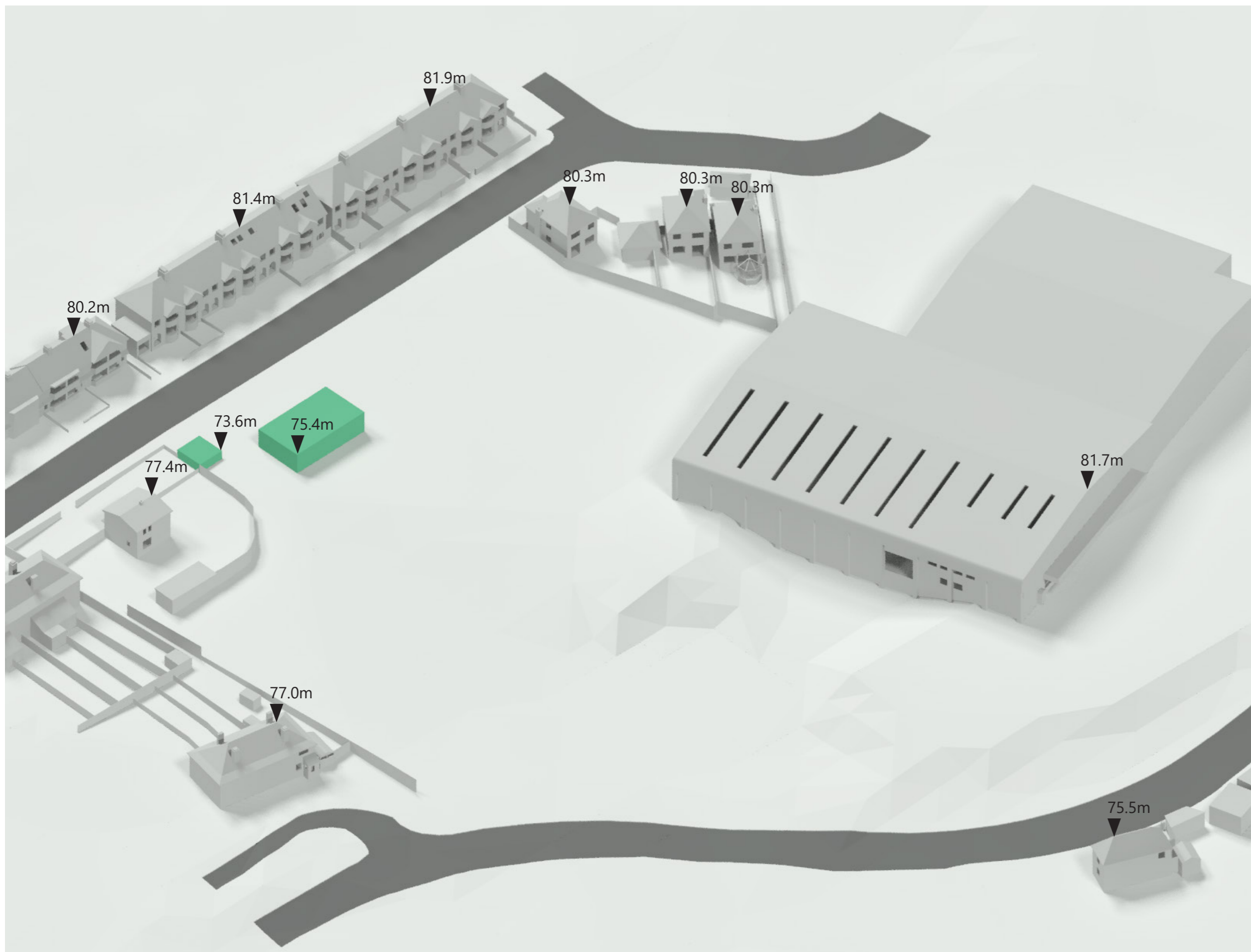
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 Received 26/02/2021
 Crampton's Road Sevenoaks_Amend-ed additional line work 02-03-2021.dwg
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 Received 15/02/2021

EB7 Ltd

Site Photographs
 Ordnance Survey



Key:

Existing

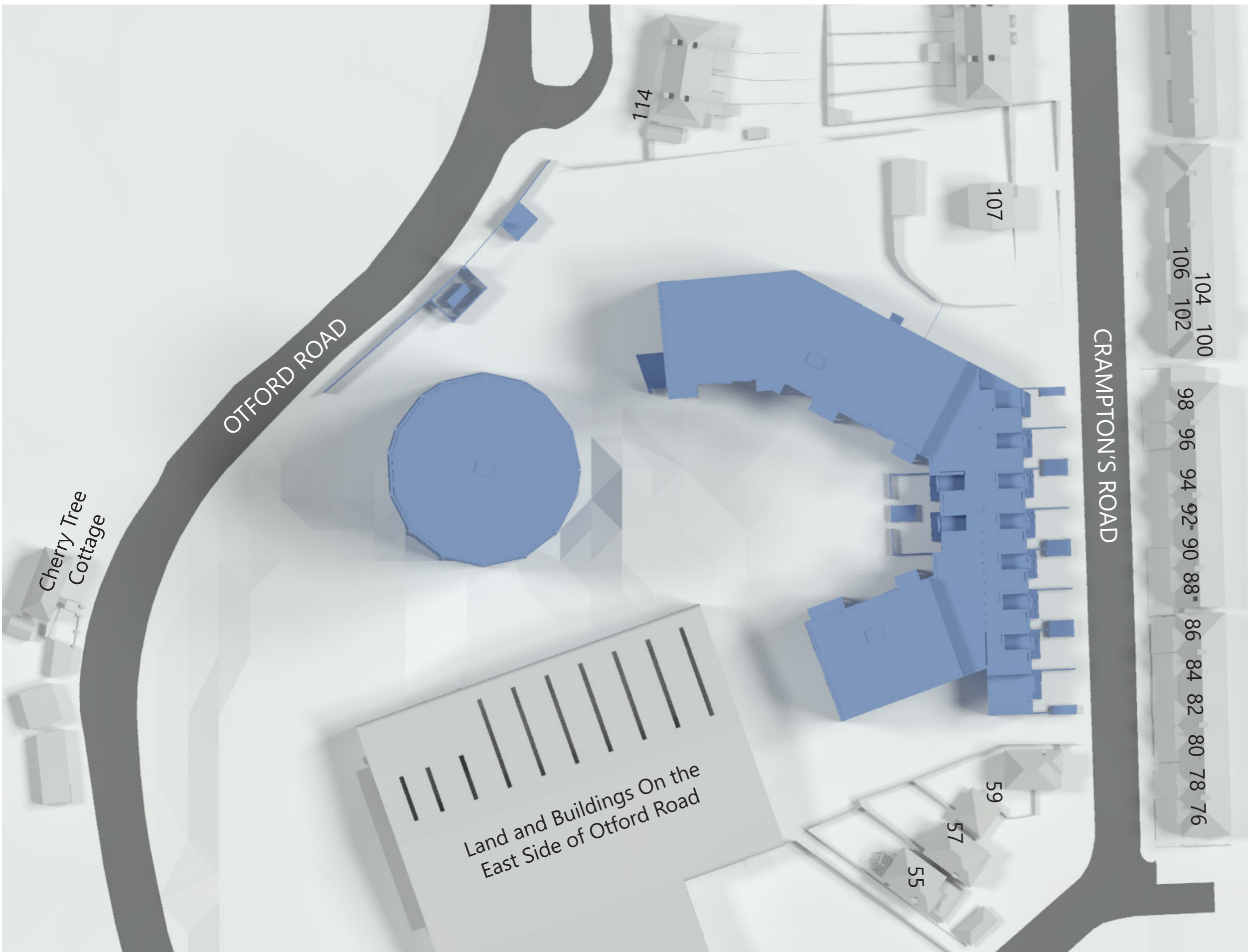
Project Sevenoaks SGN Projects

Title Existing Condition
 3D View

Drawn AD Checked

Date 05/03/2021 Project 4577

Rel no. 01 Prefix DS01 Page no. 02



Sources of information

Cloud10

Crampton's Road Sevenoaks_DISI-19-02-2021.dwg
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 Received 26/02/2021
 Crampton's Road Sevenoaks_Amend-ed additional line work 02-03-2021.dwg
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 Received 15/02/2021

EB7 Ltd

Site Photographs
 Ordnance Survey

Key:



Proposed

NORTH



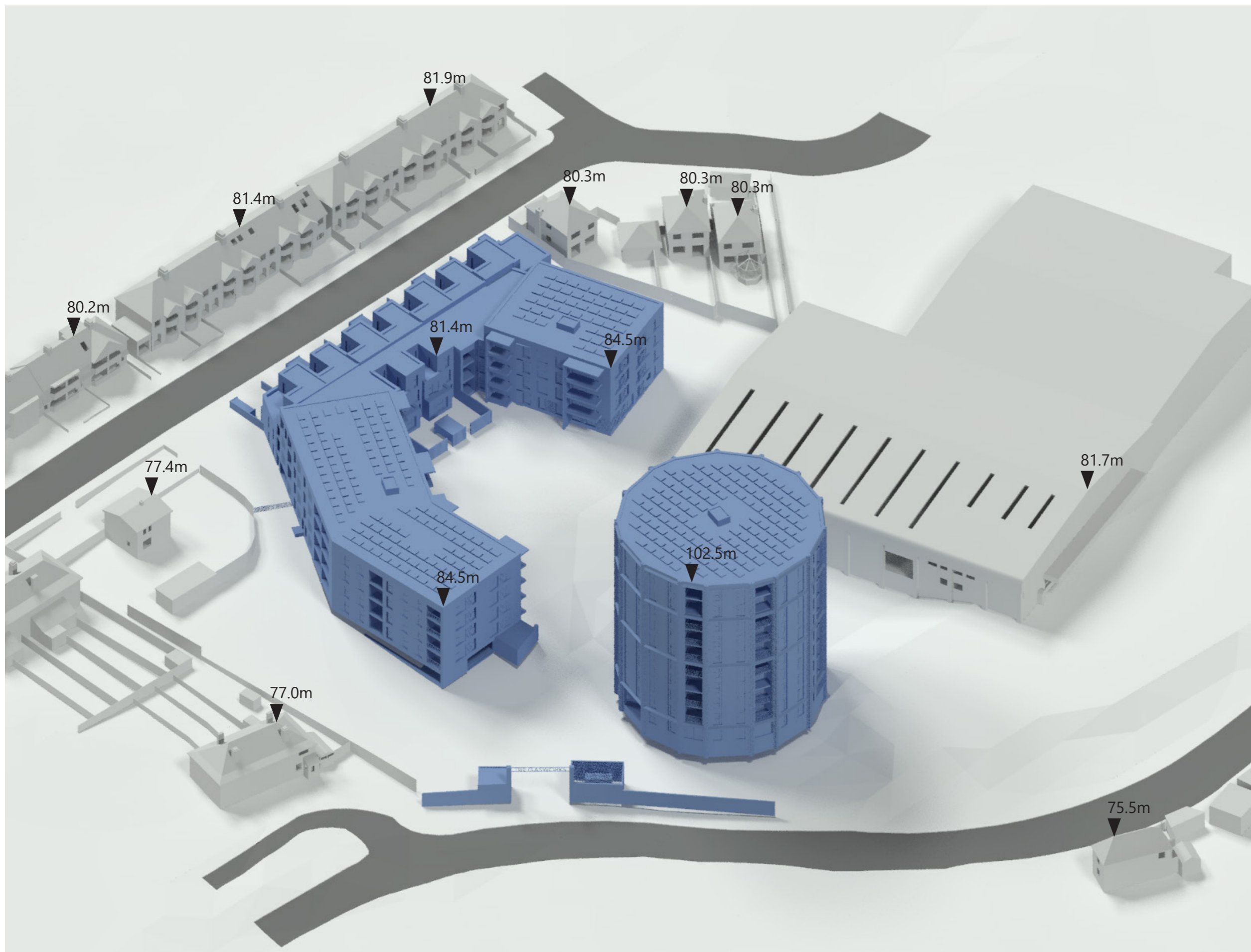
Project Sevenoaks SGN Projects

Title Proposed Development
 Plan View

Drawn AD Checked

Date 05/03/2021 Project 4577

Rel no. 01 Prefix DS01 Page no. 03



Sources of information

Cloud10
 Crampton's Road Sevenoaks_DISI-19-02-2021.dwg
 Received 19/02/2021
 Crampton's Road Sevenoaks_Amend-ed additional line work 23-02-2021.dwg
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 Crampton's Road Sevenoaks_Amend-ed additional line work 26-02-2021.dwg
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 Received 02/03/2021

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 Received 15/02/2021

EB7 Ltd
 Site Photographs
 Ordnance Survey

Key:

Proposed

Project Sevenoaks SGN Projects

Title Proposed Development
 3D View

Drawn AD Checked

Date 05/03/2021 Project 4577

Rel no. 01 Prefix DS01 Page no. 04



Appendix 2

Results of the daylight and sunlight assessments
within neighbouring properties

Address	Room	Window	Room Use	Existing VSC	Proposed VSC	Loss	Loss %	Room Area	Existing NSC	Proposed NSC	Loss	Loss %	Existing APSH Total	Existing APSH Winter	Proposed APSH Total	Proposed APSH Winter	Total Retained	Winter Retained
114 Otford Road																		
Ground	R1	W1	Residential	31.5	31.5	0.0	0.0	89.9	87.7	87.7	0.0	0.0	N/F	N/F	N/F	N/F	N/F	N/F
Ground	R3	W5	Residential	33.0	26.5	6.5	19.8	58.6	42.4	42.4	0.0	0.0	84	27	71	14	0.8	0.5
Ground	R4	W6	Residential	36.7	25.7	11.0	30.0	152.6	133.7	87.6	46.1	34.5	83	27	71	15	0.9	0.6
Ground	R5	W7	Residential	34.2	31.2	3.0	8.8	34.9	34.5	34.5	0.0	0.0	55	17	48	10	0.9	0.6
		W8		29.3	26.5	2.8	9.6											
First	R1	W1	Residential	30.0	29.0	1.0	3.2	152.6	150.5	148.1	2.4	1.6	N/F	N/F	N/F	N/F	N/F	N/F
First	R2	W2	Residential	27.8	25.7	2.2	7.8	152.6	150.6	148.0	2.6	1.7	38	12	35	9	0.9	0.8
106 Cramptons Road																		
Ground	R2	W2	Living Room	22.8	22.5	0.4	1.5	251.2	250.8	237.5	13.3	5.3	47	15	43	11	0.9	0.7
		W3		37.7	34.6	3.1	8.3											
First	R1	W1	Bedroom	29.1	28.8	0.3	1.0	86.5	86.5	86.5	0.0	0.0	47	15	44	12	0.9	0.8
		W2		38.3	35.8	2.5	6.5											
104 Cramptons Road																		
Ground	R1	W1	Living Room	37.8	34.5	3.3	8.7	251.2	250.8	250.8	0.0	0.0	47	15	43	11	0.9	0.7
		W2		23.7	20.9	2.9	12.1											
First	R1	W1	Bedroom	38.3	35.7	2.6	6.8	86.5	86.5	86.5	0.0	0.0	51	15	48	12	0.9	0.8
		W2		28.0	25.8	2.2	7.8											
102 Cramptons Road																		
Ground	R2	W2	Living Room	23.2	22.6	0.6	2.7	249.4	249.1	232.3	16.8	6.7	47	15	42	11	0.9	0.7
		W3		37.8	34.2	3.7	9.7											

Address	Room	Window	Room Use	Existing	Proposed	Loss	Loss	Room Area	Existing	Proposed	Loss	Loss	Existing APSH		Proposed APSH		Total Retained	Winter Retained
				VSC	VSC		%		NSC	NSC		%	Total	Winter	Total	Winter		
First	R1	W1	Bedroom	24.9	24.4	0.5	2.0	86.5	86.5	86.5	0.0	0.0	47	15	45	13	1.0	0.9
		W2		38.4	35.5	2.9	7.6											
Second	R1	W1	Bedroom	81.4	80.2	1.2	1.5	160.4	160.4	160.4	0.0	0.0	94	24	93	23	1.0	1.0
		W2		39.6	39.6	0.0	0.0											
100 Cramptons Road																		
Ground	R1	W1	Living Room	37.8	33.9	3.9	10.2	252.9	242.2	236.3	5.9	2.4	47	15	42	11	0.9	0.7
		W2		22.3	19.3	3.0	13.3											
First	R1	W1	Bedroom	38.4	35.3	3.1	8.0	86.5	86.5	86.5	0.0	0.0	50	16	47	14	0.9	0.9
		W2		23.7	21.4	2.3	9.6											
98 Cramptons Road																		
Ground	R2	W4	Living Room	34.4	31.8	2.6	7.5	278.9	276.8	231.7	45.1	16.3	49	15	43	11	0.9	0.7
		W5		37.8	34.0	3.7	9.9											
		W6		38.5	33.9	4.5	11.7											
		W7		36.9	32.3	4.7	12.6											
		W8		31.4	27.3	4.2	13.2											
First	R1	W1	Bedroom	37.2	34.0	3.2	8.6	66.0	64.1	64.1	0.0	0.0	39	8	36	6	0.9	0.8
First	R2	W2	Bedroom	27.7	25.7	2.1	7.4	126.9	126.3	126.3	0.0	0.0	47	15	44	13	0.9	0.9
		W3		35.0	32.1	2.9	8.3											
		W4		38.2	34.7	3.4	9.0											
		W5		34.7	31.2	3.5	10.1											
		W6		25.0	22.0	3.1	12.2											
96 Cramptons Road																		
Ground	R1	W1	Living Room	31.4	28.5	2.8	9.1											
		W2		36.8	32.7	4.0	10.9											
		W3		38.4	33.7	4.7	12.3											
		W4		37.4	32.6	4.8	12.9											

Address	Room	Window	Room Use	Existing VSC	Proposed VSC	Loss	Loss %	Room Area	Existing NSC	Proposed NSC	Loss	Loss %	Existing APSH Total	Existing APSH Winter	Proposed APSH Total	Proposed APSH Winter	Total Retained	Winter Retained	
		W2		34.0	30.2	3.8	11.1												
		W3		37.9	34.1	3.9	10.2												
		W4		35.1	31.7	3.4	9.7												
		W5		27.3	24.9	2.5	9.0	126.9	126.3	126.3	0.0	0.0	50	18	46	17	0.9	0.9	
First	R12	W6	Bedroom	36.9	33.3	3.6	9.7	65.4	63.7	63.7	0.0	0.0	45	14	43	13	1.0	0.9	
Second	R1	W1	Residential	83.7	82.2	1.5	1.8												
		W2		84.3	82.9	1.4	1.7	185.3	181.5	181.5	0.0	0.0	77	23	75	22	1.0	1.0	
Second	R2	W3	Residential	84.5	83.3	1.3	1.5	72.2	66.8	66.8	0.0	0.0	76	22	75	22	1.0	1.0	
86 Cramptons Road																			
Ground	R2	W4	Living Room	33.6	29.3	4.3	12.7												
		W5		37.4	32.6	4.7	12.7												
		W6		38.2	33.7	4.5	11.8												
		W7		36.4	32.8	3.6	10.0												
		W8		30.7	28.4	2.3	7.6	151.0	150.3	150.3	0.0	0.0	49	14	44	13	0.9	0.9	
First	R1	W1	Bedroom	35.9	32.8	3.1	8.6	66.7	64.4	64.4	0.0	0.0	37	8	35	7	0.9	0.9	
First	R2	W2	Bedroom	27.1	24.2	2.9	10.7												
		W3		35.2	32.0	3.2	9.0												
		W4		37.9	34.9	3.0	7.9												
		W5		34.5	32.1	2.4	7.0												
		W6		24.5	22.9	1.5	6.2	126.5	126.1	126.1	0.0	0.0	47	15	46	15	1.0	1.0	
84 Cramptons Road																			
Ground	R1	W1	Living Room	31.2	27.2	4.1	13.1												
		W2		36.6	32.3	4.4	12.0												
		W3		38.1	34.0	4.0	10.6												
		W4		36.9	33.7	3.1	8.5												
		W5		32.6	30.7	1.9	5.7	147.9	147.1	147.1	0.0	0.0	50	14	46	14	0.9	1.0	

Address	Room	Window	Room Use	Existing	Proposed	Loss	Loss	Room Area	Existing	Proposed	Loss	Loss	Existing APSH		Proposed APSH		Total Retained	Winter Retained
				VSC	VSC		%		NSC	NSC		%	Total	Winter	Total	Winter		
First	R1	W1	Bedroom	24.5	21.7	2.8	11.4	123.3	122.7	122.7	0.0	0.0	49	17	48	17	1.0	1.0
		W2		34.6	31.6	3.0	8.6											
		W3		37.9	35.2	2.7	7.2											
		W4		35.1	32.9	2.1	6.1											
		W5		27.2	26.0	1.3	4.7											
First	R2	W6	Bedroom	35.9	33.4	2.5	6.9	67.2	64.6	64.6	0.0	0.0	42	13	41	13	1.0	1.0
82 Cramptons Road																		
Ground	R2	W3	Living Room	32.9	29.4	3.6	10.8	151.9	151.1	151.1	0.0	0.0	49	14	46	14	0.9	1.0
		W4		36.9	33.3	3.6	9.7											
		W5		37.8	34.7	3.1	8.2											
		W6		36.1	33.9	2.2	6.1											
		W7		30.5	29.4	1.1	3.7											
First	R1	W1	Bedroom	35.6	33.3	2.3	6.6	66.7	64.0	64.0	0.0	0.0	37	8	36	8	1.0	1.0
First	R2	W2	Bedroom	26.8	24.3	2.5	9.4	127.3	126.9	126.9	0.0	0.0	47	15	46	15	1.0	1.0
		W3		35.0	32.4	2.5	7.3											
		W4		37.8	35.5	2.2	5.9											
		W5		34.4	32.7	1.6	4.7											
		W6		24.5	23.6	0.9	3.6											
80 Cramptons Road																		
Ground	R1	W1	Living Room	30.8	27.6	3.3	10.7	152.2	151.3	151.3	0.0	0.0	51	15	49	15	1.0	1.0
		W2		36.2	32.9	3.3	9.0											
		W3		37.6	34.9	2.8	7.3											
		W4		36.5	34.6	1.9	5.2											
		W5		32.4	31.5	0.9	2.8											
First	R1	W1	Bedroom	24.4	22.0	2.4	9.6											
		W2		34.4	32.0	2.4	6.8											
		W3		37.7	35.7	2.0	5.4											
		W4		35.0	33.5	1.4	4.1											

Address	Room	Window	Room Use	Existing	Proposed	Loss	Loss	Room Area	Existing	Proposed	Loss	Loss	Existing APSH		Proposed APSH		Total Retained	Winter Retained
				VSC	VSC		%		NSC	NSC		%	Total	Winter	Total	Winter		
		W5		27.2	26.5	0.7	2.6	127.6	127.2	127.2	0.0	0.0	49	17	48	17	1.0	1.0
First	R2	W6	Bedroom	35.9	34.0	1.9	5.2	67.2	64.6	64.6	0.0	0.0	43	14	42	14	1.0	1.0
78 Cramptons Road																		
Ground	R2	W4	Living Room	32.5	29.8	2.8	8.5	151.9	151.0	151.0	0.0	0.0	48	14	47	14	1.0	1.0
		W5		36.5	33.9	2.6	7.1											
		W6		37.6	35.5	2.0	5.4											
		W7		36.1	34.8	1.2	3.4											
		W8		30.8	30.4	0.5	1.5											
First	R1	W1	Bedroom	35.7	33.9	1.8	5.0	66.7	63.8	63.8	0.0	0.0	37	9	36	9	1.0	1.0
First	R2	W2	Bedroom	26.7	24.6	2.1	7.8	127.3	126.8	126.8	0.0	0.0	47	15	46	15	1.0	1.0
		W3		34.9	32.9	2.0	5.8											
		W4		37.8	36.1	1.7	4.4											
		W5		34.4	33.3	1.1	3.1											
		W6		25.2	24.7	0.5	1.8											
76 Cramptons Road																		
Ground	R1	W1	Living Room	30.7	28.4	2.3	7.5	151.5	150.6	150.6	0.0	0.0	54	18	53	18	1.0	1.0
		W2		35.9	33.9	2.1	5.7											
		W3		37.5	36.0	1.5	4.1											
		W4		37.2	36.4	0.9	2.3											
		W5		34.1	33.9	0.3	0.7											
First	R1	W1	Bedroom	24.7	22.8	1.9	7.5	126.9	126.5	126.5	0.0	0.0	49	17	48	17	1.0	1.0
		W2		34.3	32.6	1.7	5.0											
		W3		37.7	36.3	1.4	3.6											
		W4		35.2	34.4	0.8	2.4											
		W5		27.9	27.5	0.3	1.1											
First	R2	W6	Bedroom	35.6	34.4	1.2	3.4	65.5	62.8	62.8	0.0	0.0	44	15	43	15	1.0	1.0

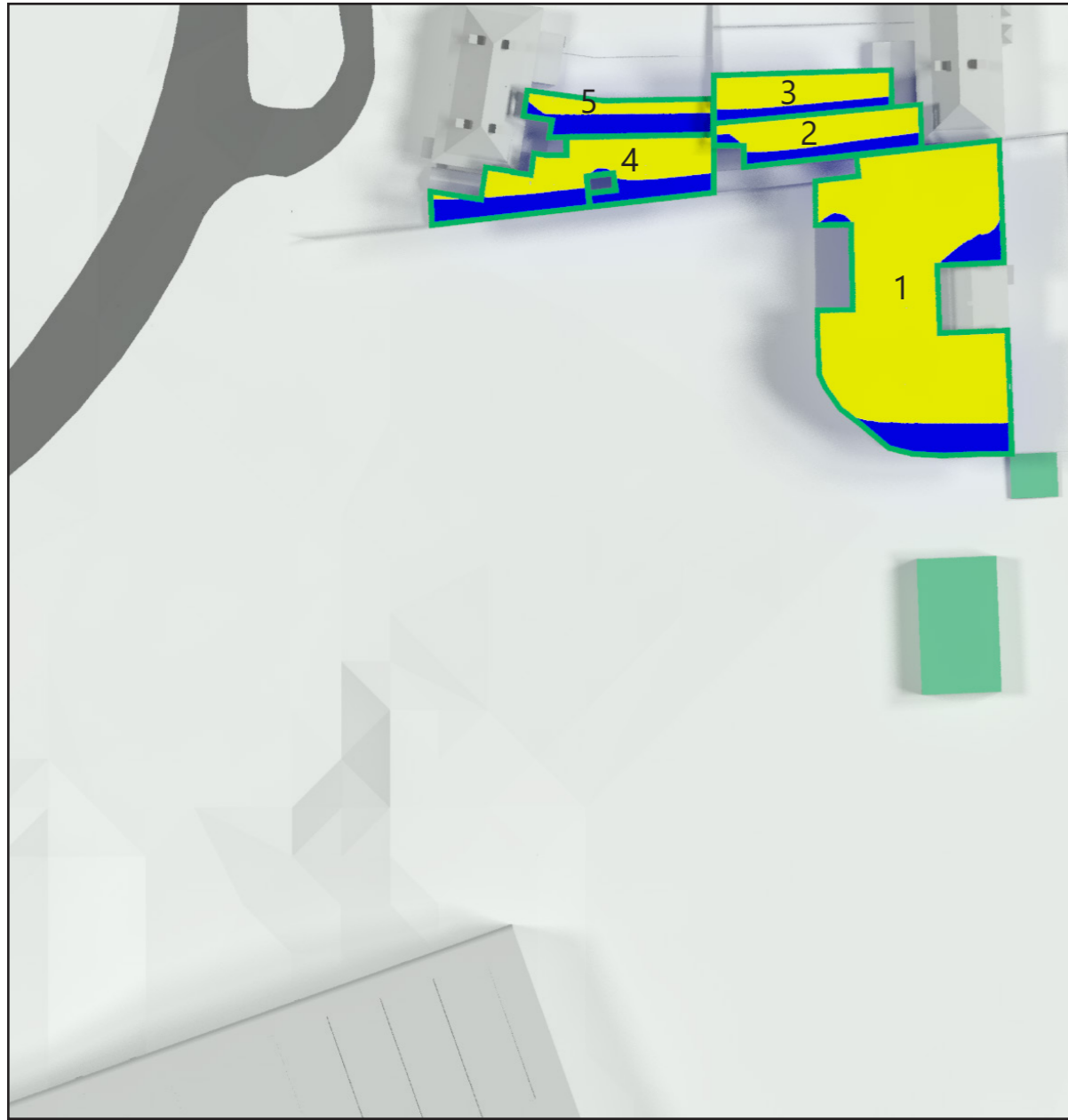
Address	Room	Window	Room Use	Existing VSC	Proposed VSC	Loss	Loss %	Room Area	Existing NSC	Proposed NSC	Loss	Loss %	Existing APSH Total	Existing APSH Winter	Proposed APSH Total	Proposed APSH Winter	Total Retained	Winter Retained	
		W4-U																	
		W5-L		32.3	31.8	0.5	1.6												
		W5-U																	
		W6-L		32.8	32.8	0.0	0.0												
		W6-U																	
		W7		63.8	61.0	2.9	4.5												
		W8		86.4	82.6	3.7	4.3												
		W9		88.2	85.6	2.6	3.0												
		W10		87.0	86.1	0.9	1.0												
		W11		74.6	74.4	0.1	0.2	231.6	231.6	231.6	0.0	0.0	76	25	76	25	1.0	1.0	
First	R2	W2	Residential	33.1	29.4	3.6	11.0	80.1	79.5	79.5	0.0	0.0	N/F	N/F	N/F	N/F	N/F	N/F	
First	R3	W3	Residential	32.9	29.8	3.1	9.4	106.8	106.4	106.4	0.0	0.0	N/F	N/F	N/F	N/F	N/F	N/F	
Cherry Tree Cottage																			
Ground	R1	W1-L	Residential	31.5	29.9	1.6	5.1												
		W1-U						115.3	113.3	113.3	0.0	0.0	57	18	53	18	0.9	1.0	
Ground	R3	W5-L	Residential	32.3	29.1	3.2	9.9												
		W5-U						64.3	61.0	60.4	0.6	1.0	44	5	40	5	0.9	1.0	
Ground	R4	W6-L	Residential	36.4	33.0	3.5	9.5												
		W6-U																	
		W7-L		39.0	36.8	2.2	5.5												
		W7-U						146.8	145.4	145.4	0.0	0.0	57	16	53	16	0.9	1.0	
First	R1	W1-L	Residential	35.4	32.7	2.7	7.7												
		W1-U																	
		W5-L		37.3	37.3	0.0	0.0												
		W5-U						115.3	115.3	115.3	0.0	0.0	84	26	80	26	1.0	1.0	
First	R2	W2-L	Residential	35.4	32.4	3.0	8.6												
		W2-U						85.4	77.2	72.6	4.6	5.9	53	18	49	18	0.9	1.0	

Address	Room	Window	Room Use	Existing VSC	Proposed VSC	Loss	Loss %	Room Area	Existing NSC	Proposed NSC	Loss	Loss %	Existing APSH Total	Existing APSH Winter	Proposed APSH Total	Proposed APSH Winter	Total Retained	Winter Retained	
First	R3	W3-L	Residential	35.4	32.1	3.3	9.3												
		W3-U																	
		W4-L		37.0	35.0	2.0	5.5												
		W4-U						146.8	145.2	145.2	0.0	0.0	54	18	50	18	0.9	1.0	

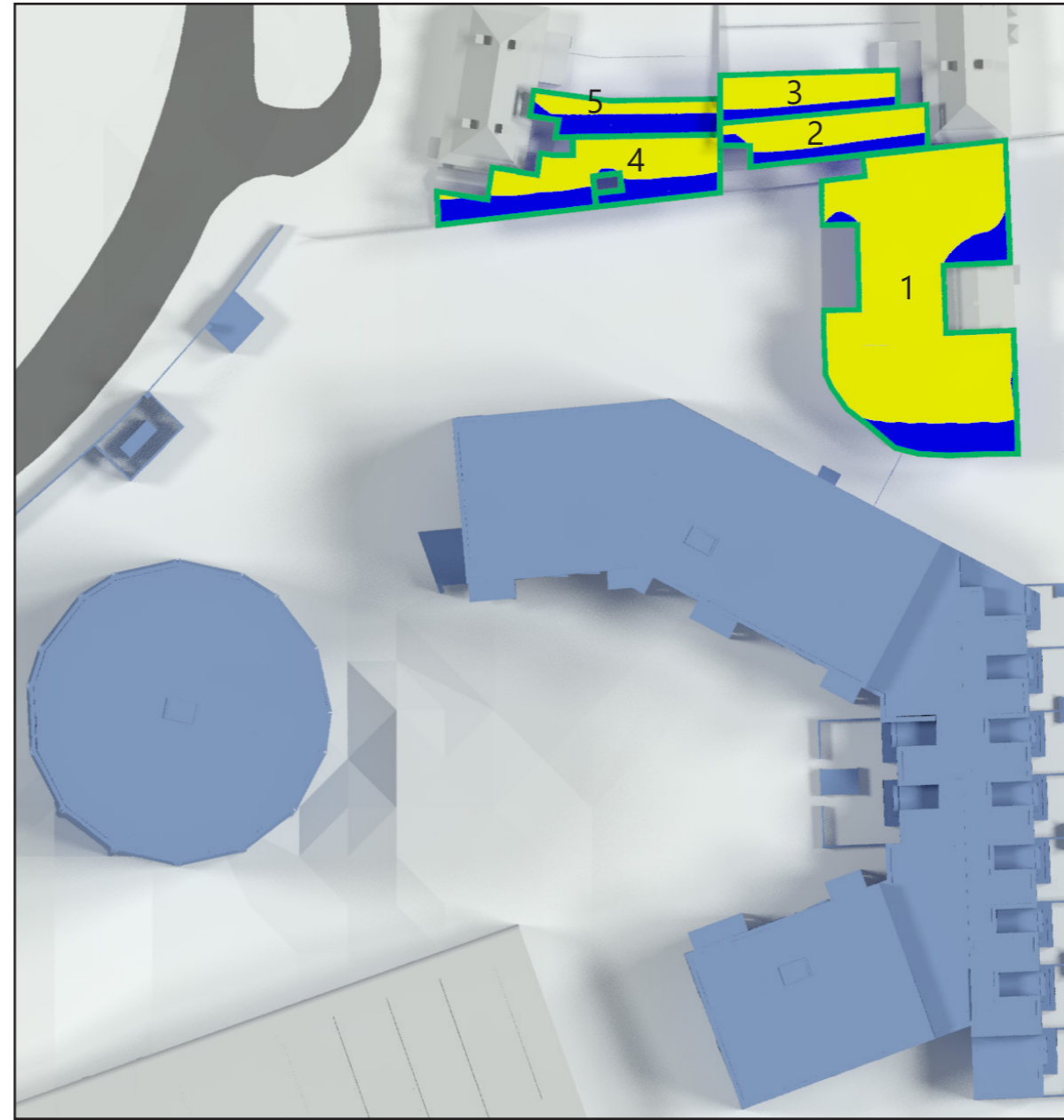


Appendix 3

Results of the sunlight amenity assessment



Existing Scenario



Proposed Scenario

Area	Total Area (sq.m)	Existing area more than 2 hours (sq.m)	Existing % more than 2 hours	Proposed area more than 2 hours (sq.m)	Proposed % more than 2 hours	Proportion Retained
1 - 107 Crampton's Road	485.44	421.49	87.0	413.99	85.0	0.98
2 - 109 Crampton's Road	89.98	61.26	68.0	61.26	68.0	1.00
3 - 111 Crampton's Road	79.31	58.14	73.0	58.14	73.0	1.00
4 - 114 Otford Road	153.76	91.25	59.0	89.28	58.0	0.98
5 - 116 Otford Road	70.34	29.45	42.0	29.45	42.0	1.00

YES BRE's Sun On Ground
 Area being at least two hours of sunlight

NO Day: 21st March
 Latitude: 51.4°N
 Effective day length: 10 hours
 *Min solar angle 10° (BR209 3.3.8)

Sources of information

Cloud10
 Crampton's Road Sevenoaks_DISI-19-02-2021.dwg
 Received 19/02/2021
 Crampton's Road Sevenoaks_Amended additional line work 23-02-2021.dwg
 Received 23/02/2021
 Crampton's Road Sevenoaks_Amended additional line work 26-02-2021.dwg
 Received 26/02/2021
 Crampton's Road Sevenoaks_Amended additional line work 02-03-2021.dwg
 Received 02/03/2021

MAX architects
 Sevenoaks_Model_NB-SB-TH.dwg
 Sevenoaks_Model_Rotunda.dwg
 0330_3000.pdf
 0330_3010.pdf
 0330_3030.pdf
 0330_3040.pdf
 0330_3050.pdf
 Received 15/02/2021

EB7 Ltd
 Site Photographs
 Ordnance Survey

Key:

- Existing
- Proposed
- Area of assessment



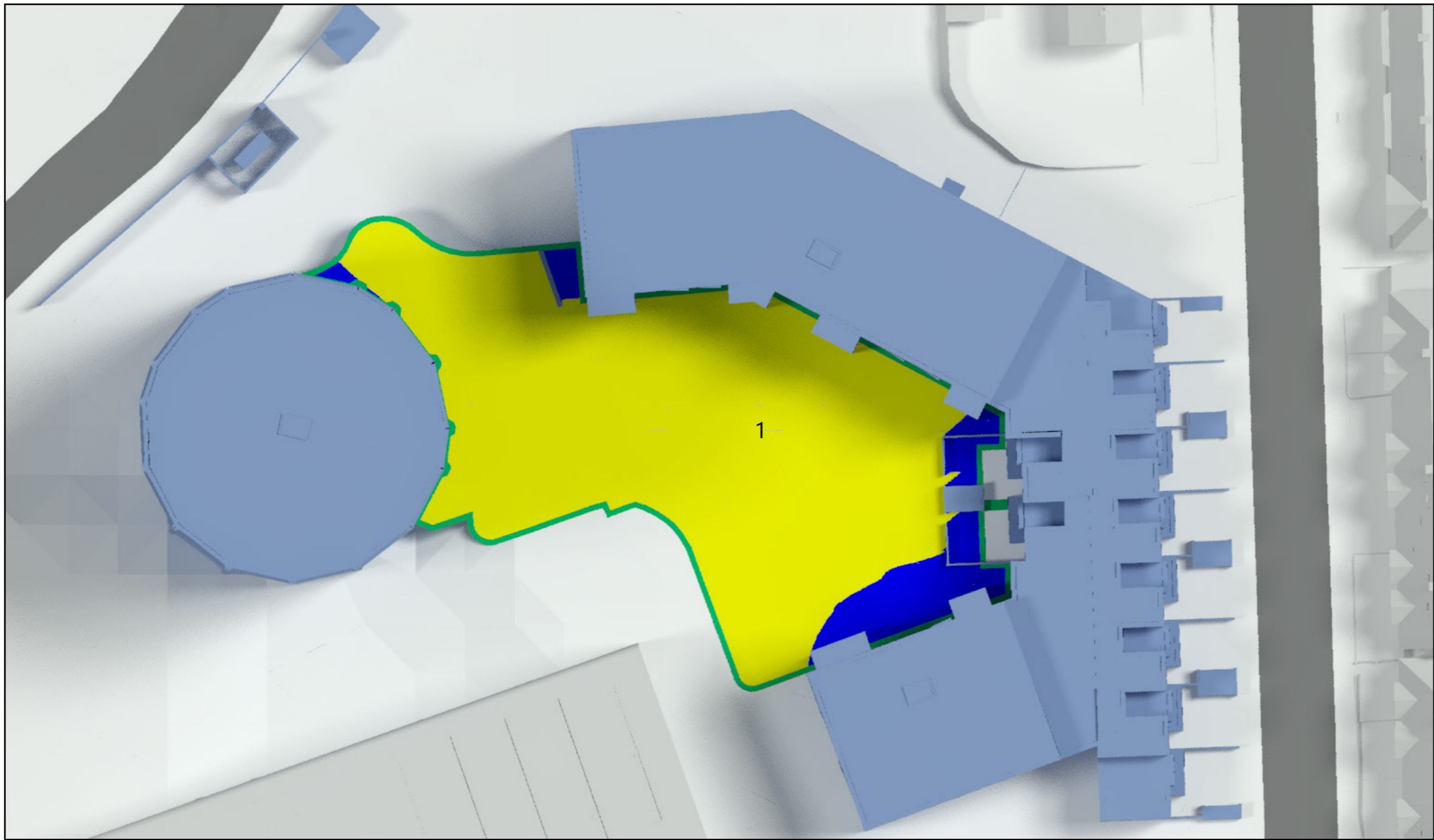
Project Sevenoaks SGN Projects

Title Sunlight Amenity Study
 Existing vs Proposed
 21st March

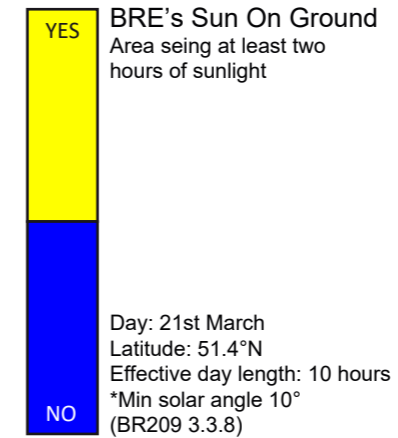
Drawn AD Checked --

Date 05/03/2021 Project 4577

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Area	Total Area (sq.m)	Area more than 2 hours (sq.m)	Area % more than 2 hours
1	1752.31	1525.0	87.0



Sources of information

Cloud10
 Crampton's Road Sevenoaks_DISI-19-02-2021.dwg
 Received 19/02/2021
 Crampton's Road Sevenoaks_Amend-ed additional line work 23-02-2021.dwg
 Received 23/02/2021
 Crampton's Road Sevenoaks_Amend-ed additional line work 26-02-2021.dwg
 Received 26/02/2021
 Crampton's Road Sevenoaks_Amend-ed additional line work 02-03-2021.dwg
 Received 02/03/2021

MAX architects
 Sevenoaks_Model_NB-SB-TH.dwg
 Sevenoaks_Model_Rotunda.dwg
 0330_3000.pdf
 0330_3010.pdf
 0330_3030.pdf
 0330_3040.pdf
 0330_3050.pdf
 Received 15/02/2021

Churchman Thornhill Finch
 573-CTF-XX-XX-M2-LB00_Landscape Plan 20210303_Rev C.dwg
 Received 10/03/2021

EB7 Ltd
 Site Photographs
 Ordnance Survey

Key:

- Proposed
- Area of assessment



Project Sevenoaks SGN Projects
 Sevenoaks
 TN14 5DY

Title Sunlight Amenity Study
 Proposed
 21st March

Drawn VM Checked --

Date 12/03/2021 Project 4577

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