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By e-mail

10 June 2022

Dear Doyle Kent Planning Partnership Ltd,

Project: 14849 Glebe House, Crumlin, Dublin 12 – Daylight and Sunlight Technical Note

At the time of producing our daylight and sunlight report there were a number of different standards and guidelines which in the writing of this report appropriate and reasonable regard has been taken to address.

It should be noted at this point the *BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’* has been included within this report even though it has now been withdrawn because the BRE guide ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) and the BS 8206-2: 2008 directly refer to each other as noted within the BRE guide itself as below.

“This guide gives advice on site layout planning to achieve good sunlight and daylight both within buildings and in the open spaces between them. It is intended to be used in conjunction with the interior daylight recommendations in the British Standard Code of practice for daylighting, *BS 8206-2: 2008*.”

In addition to this, The Sustainable Urban Housing: Design Standards for New Apartments December 2020 states the following in Section 6.6:

“Planning authorities should have regard to quantitative performance approaches to daylight provision outlined in guides like the BRE guide ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’ when undertaken by development proposers which offer the capability to satisfy minimum standards of daylight provision.”

However, on the day before submission of said report (10/06/2022) an updated BRE 209 Daylight Guide (3rd Edition) was published. This new BRE 209 Daylight Guide (3rd Edition) refers to the latest daylighting standards for the assessment of daylight access within buildings titled “*EN 17037:2018: Daylight in*

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Buildings” which has been adopted in Ireland as IS EN 17037:2018. This new standard is not directly referred to within the latest Planning Authority Guidelines whereas the BRE Guide (2nd Edition) and BS 8206-2:2008 are referred to.

Furthermore, the EN 17037:2018 standard has already been adopted in the UK to inform the BS EN 17037:2018 standard which supersedes BS 8206-2:2008 which is now withdrawn. It is important to note that BS EN 17037:2018 includes a National Annex which specifically addresses daylight provision in residential dwellings in the UK. A similar annex is not included in the IS EN 17037:2018 standard.

Therefore, with regards to interior daylighting and external sunlight exposure in particular, where different methodologies are found in each of the different standards, all methodologies have been employed for completeness to ensure appropriate and reasonable regard has been taken to address all assessments under all of the different standards. For clarity these are listed below:

- BRE Guide – 2nd Edition of BR 209 BRE Site Layout Planning for Daylight and Sunlight
- BS 8206-2:2008 – Lighting for Buildings – Part 2: Code of Practice for Daylighting
- IS EN 17037:2018 – Daylight in Buildings
This is the Irish implementation of the European EN 17037:2018 standard
- BS EN 17037:2018 – Daylight in Buildings
This is the UK implementation of the European EN 17037:2018 standard. It supersedes BS 8206-2:2008 which is withdrawn in the UK. The BS EN standard includes a National Annex which addresses daylight requirements specific to dwellings which is notable as Ireland’s climate matches closely with the UK.

We have reviewed the BRE Guide – 3rd Edition of BR 209 BRE Site Layout Planning for Daylight and Sunlight and note all assessments carried out under this guide are the same assessments as noted within the BRE Guide 2nd Edition. As noted above, the main difference between the two publications of the guide are that the latest 3rd Edition refers to the new standards of Daylight in Buildings IS/BS-EN 17037:2018.

Douglas Bell

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