



ethos
ENGINEERING



Development Plan Team
Planning and Property Development Department
Dublin City Council
Wood Quay
Dublin 8

Date: 11th February 2022
Re: Draft Dublin City Development Plan 2022-2028: Public Consultation

Dear Development Plan Team,

The undersigned sunlight and daylight consultants, ARC Architectural Consultants, Ethos Engineering, Integrated Environmental Solutions, IN2 Engineering, Metec Engineering, O'Connor Sutton Cronin Consultant Engineers and Passive Dynamics, are writing to you in connection with the on-going public consultation on the draft *Dublin City Development Plan 2022-2028*, and, in particular with the best practice guide to sunlight and daylight assessment at Appendix 16. The undersigned consultants welcome Dublin City Council's intention to provide clarity for all stakeholders in the planning process on how sunlight and daylight analysis of development should be approached. How best to apply guidance on daylight and sunlight analysis under the planning system has become an increasingly difficult question to answer and further guidance is badly needed to counter problems created by existing uncertainty.

However, it is noted that the Draft Appendix 16 makes considerable reference to and relies on *British Standard, BS 8206-2:2008: Lighting for buildings - Part 2: Code of practice for daylighting* and PJ Littlefair's 2011 *Site layout planning for daylight and sunlight: a guide to good practice* for the Building Research Establishment (the BRE Guide, second edition). BS 8206-2:2008 was withdrawn by the British Standards Institution in May 2019, while a third edition of the BRE Guide (which we understand will reference BS EN 17037 in lieu of the withdrawn BS 8206-2:2008) is due to be published in early 2022. In addition to this, it is our understanding that BRE will produce a Guidance document for Daylighting practitioners on behalf of Chartered Institute of Building Services Engineers (CIBSE) in 2022, which will address aspects for calculation methodologies (such as grid spacing and the extent of rooms to be analysed).

As some of the requirements set out in the Draft Appendix 16 refer to an already withdrawn document (i.e. BS 8206-2:2008), while others refer to a document about to be replaced (i.e. BR209, the BRE Guide), it is respectfully suggested that the Draft Appendix 16 is premature pending the publication of the third edition BRE Guide and the expected guidance document on methodologies from BRE/CIBSE.

Should you have any queries in relation to the above or should you require any further information, please do not hesitate to contact us. We would be happy to meet / discuss further should that be of assistance.

Please send any correspondence in response to this letter c/o Amy Hastings at info@arc.ie or ARC Architectural Consultants, 30 Dalkey Park, Dalkey, Co. Dublin.

Yours sincerely,

Amy Hastings, **ARC Architectural Consultants**
PJ Ryan, **Ethos Engineering**
Douglas Bell, **Integrated Environmental Solutions**
David Walshe, **IN2 Engineering**
Scott Caldwell, **Metec Engineering**
Patrick Field, **O'Connor Sutton Cronin Consultant Engineers**
Ciarán McCabe, **Passive Dynamics**

