DATE / REF
25/08/2026
KST/20231

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TECHNICAL NOTE: Response to Highways Department Development Control Queries in relation to Solar Glare from 10-12 Whitworth Street

Following consultation feedback provided by Highways Department Development Control on 29th July 2026, regarding potentially significant solar glare impacts of the proposed development on road users surrounding the development, GIA have prepared the following clarification.

Highways Department Development Control Feedback

"it is noted that after mitigation significant glare effects could still potentially occur at Lower Mosley Street / Bishopsgate and Whitworth Street West / Albion Street. Whilst the assessment concludes that these effects would not result in a highway safety concern, the residual impacts remain classified as Moderate Adverse and Significant.

The applicant is therefore requested to provide further justification regarding the proposed mitigation strategy, including:

- *Justification that the proposed mitigation represents the maximum reasonable reduction in glare effects;*
- *Details of any alternative mitigation measures considered; and*
- *Confirmation as to whether any additional measures could further reduce the residual effects at Lower Mosley Street / Bishopsgate and Whitworth Street West / Albion Street, or why this is not feasible.*

Highway would welcome further evidence demonstrating that all reasonable opportunities to minimise solar glare impacts at these locations have been fully explored."

GIA Response

Reasonable mitigation proportionate to this stage of the design has already been embedded within the façade design, such as the facade having a predominately solid appearance with the size of glazed areas being kept to a minimum. This means that any reflections that do occur would only happen for very short durations and would be low in intensity as the full solar disc would not be reflected.

Based on the size of the window openings, the broken-up nature of the reflections, the time of day and year that reflections could occur as well as other factors such as alternative traffic lights and the shielding that can be achieved by deploying a visor, it is considered that whilst technically reflections that are significant in EIA terms will occur, with the inclusion of low VLR glazing, the safety risk associated with the reflections at these locations can been appropriately mitigated albeit the categorisation of effect does not alter.

Whilst alternative, more onerous mitigation strategies such as external shading devices could have been used, given the above relevant factors, the risk of glare is not sufficient to warrant this extent of mitigation which would inevitably have a substantial impact on the appearance of the building and the daylight/view out of occupants of the rooms behind the relevant windows.

It is not unusual for tall buildings in an urban setting to lead to similar solar glare effects and it is standard practice to undertake further detailed solar glare intensity testing for locations where significant effects occur, once the reflective specification of the glazing is known which is not usually until the later design stages. It should also be noted that the reflections that occur would likely happen to a similar degree from any building with windows in this location.

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It has been recommended that further detailed testing is undertaken at the appropriate design stage to ensure the intensity of reflections are mitigated effectively, which is to be secured via a planning condition. Typically where solar glare is a potential issue, it would be reasonable to have a condition requiring full details of glazing and cladding, including visible light reflectance and solar reflectance values to be submitted for approval to the LPA prior to above ground works commencing.

Based on experience, for reflections such as those generated by the Proposed Development, restrictions on the glazing specification are generally sufficient to address glare risk, however should the detailed testing identify any residual concern from the solar glare perspective, further mitigation would be explored and if needed the design amended accordingly in order to discharge the condition.

I trust this addresses the further information requested in relation to the 10-12 Whitworth Street proposal.

Yours sincerely

For and on behalf of GIA

[redacted]

Krystle Stewart

[redacted]