Daylight Impact Assessment

DATE OF ISSUE: **31 AUGUST 2021**

ISSUE: **03**

HM REFERENCE: **27319-RP-IE-001**

PROJECT:

EDEN PROJECT NORTH

MORECAMBE

CLIENT:





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PROJECT NAME:	**EDEN PROJECT NORTH**
REPORT NAME:	**Daylight Impact Assessment**
ISSUE STATUS:	**FINAL**
HM REFERENCE:	**27319-RP-IE-001**
DATE OF ISSUE:	**31 AUGUST 2021**
ISSUE:	**03**
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DOCUMENT HISTORY:

ISSUE	DATE	DETAILS
01	30/7/2021	FINAL
02	17/8/2021	FOR COMMENTS
03	31/8/2021	FINAL

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1. Executive Summary

Hilson Moran has been commissioned by Eden Project International Ltd. to undertake a daylight impact assessment to support the proposed development of Eden Project North, located in Morecombe.

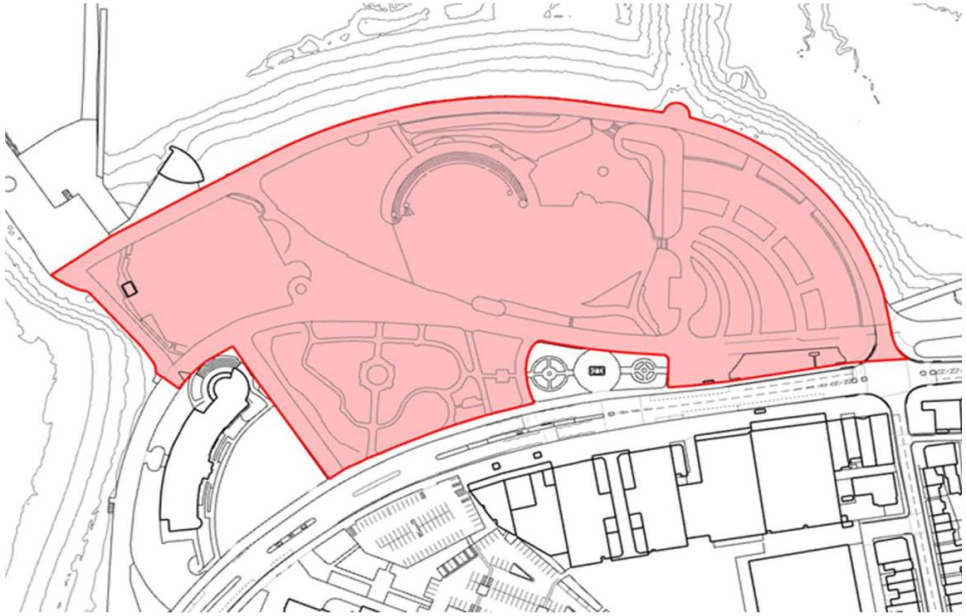


Figure 1 Site plan Location

This report describes the effect of the proposed development on the daylight and sunlight to habitable rooms in adjacent existing developments to the application site and the effects on overshadowing on adjacent amenity spaces.

The Building Research Establishment's (BRE) *'Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice'* (Littlefair, 2011) was used to establish the extent to which the proposed development meets current best practice guidelines. In cases where the proposed development is likely to cause a reduction of daylight and sunlight to key receptors in the surrounding area, the results were compared against the criteria.

While the BRE benchmarks are widely used, these criteria should not be seen as an instrument of planning policy. As stated in the BRE Guide:

'…..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.'

1.1. Surrounding Context

The site extends to circa 4.58 hectares and comprises land situated to the north and west of Morecambe Town Centre. The main development site bound by the promenade to the north and east, Marine Road Central to the south and the Grade II* listed Midland Hotel to the west. The main development site is identified by Lancaster City Council as a Development Opportunity Site. The site is known as the Seafront Headland, Central Promenade.

1.2. Summary of Effects

Full details of the daylight and sunlight analysis are included in Appendix 1 of this report and a brief summary has been provided below.

The daylight assessment has been conducted for receptors of the surrounding domestic and hospitality buildings. Impacts on retail units had been excluded as they are not sensitive receptors to daylight and sunlight.

Windows of residential dwellings have been classified as having a high sensitivity to daylight whereas commercial office or hotel spaces have been classified as having a medium sensitivity to daylight.

The results of the daylight, sunlight and overshadowing assessments have indicated that the proposed development has a negligible effect on all of the surrounding developments and outdoor areas.

2. Daylight, Sunlight and Overshadowing Assessment Process

2.1. Guidance

Building Research Establishment (BRE), Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice (Littlefair, 2011)

The BRE Guide provides criteria and methods that are detailed below for calculating the effect of the proposed development on the daylight and sunlight availability to surrounding properties. These guidelines were first published in 1991, and superseded the document 'Sunlight and Daylight Planning Criteria and Design of Buildings' (Department of the Environment, 1971). The second and latest edition of the BRE Guide was released in 2011.

The BRE Guide includes advice on how to achieve good daylighting and sun lighting both within buildings and open spaces in new developments. It also covers guidance to safeguard daylight and sunlight of existing buildings nearby and the protection of daylighting of adjoining land for future development.

Whilst the BRE Guide provides numerical guidelines for daylight, sunlight and overshadowing, these criteria should not be seen as absolute targets since, as the document states, the intention of the Guide is to help rather than constrain the designer. The Guide is not an instrument of planning policy, therefore, whilst the methods given are technically robust, some level of flexibility should be applied given the context and constraints of the site.

2.2. Assessment Modelling

2.2.1. Scope of the Assessment

The purpose of the study is to determine the effect of the proposed development on the daylight and sunlight availability to windows of the surrounding developments.

2.2.2. Extent of the Study Area

The study area modelled for this analysis includes the site and the surrounding properties likely to be affected by the proposed development. The buildings around the site that were identified for the purpose of this study are illustrated in Figure 2.1 and listed in Table 2.1.

A plane is drawn at 25° from the horizontal, at the centre of an existing window. If the new development intersects with this plane, the internal daylight levels of the surrounding windows may be reduced. When an obstruction of the 25° plane occurs, a more detailed assessment involving the Vertical Sky Component of the affected window would need to be carried out.

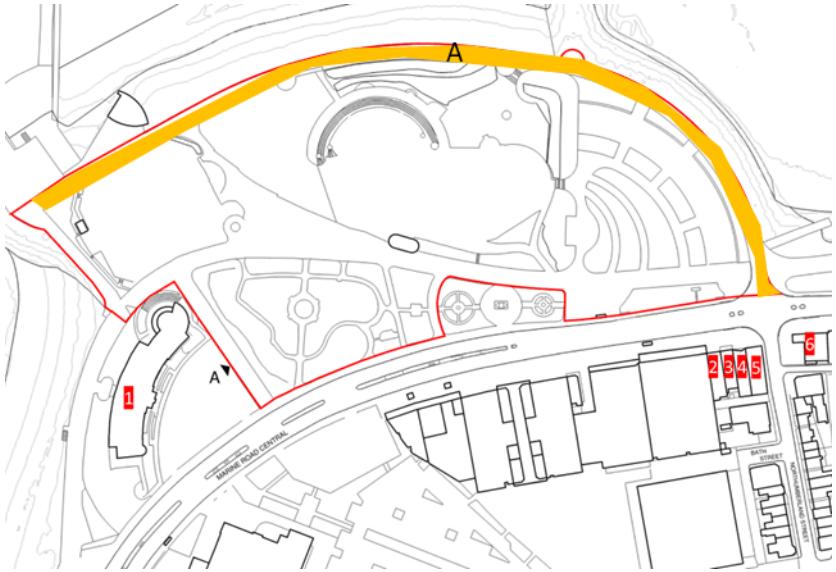


Figure 2.1 Buildings and outdoor areas identified for the assessment

No.	Building Reference	Use
1	The Midland - Hotel	Hospitality
2	Apartment above Bedland - Marine Rd Central	Residential
3	Apartment above Brucciani - Marine Rd Central	Residential
4	Apartment above Costa - Marine Rd Central	Residential
5	Apartment above Troutflies - Marine Rd Central	Residential
6	223 Marine Rd Central	Residential

Table 2.1 Buildings and uses identified for the assessment

Other residential properties were identified above Rita's/Coopers Amusements on Marine Road Central. The 25° threshold does not apply to the windows here, and therefore they do not require a detailed assessment.

No.	Space Reference	Use
A	Pier Walk	Public Realm

Table 2.2 Outdoor areas and uses identified for the assessment

2.2.3. Method of Data Collation

The baseline and proposed conditions at the site and the surrounding areas were established from the following:

- 3D model of the existing buildings provided by the design team; and
- 3d model of the proposed development produced by Grimshaw architects, and received on 06/07/2021.

The baseline and proposed scenarios assessed for the purposes of this study have been illustrated in **Figures 2.2 and 2.3.**

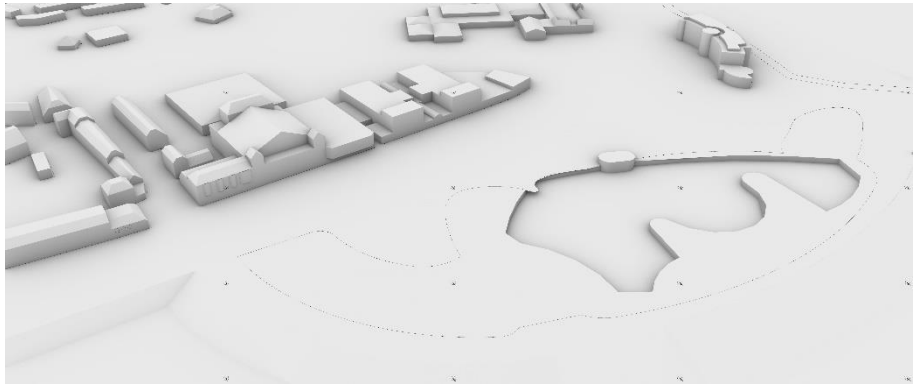


Figure 2.2 Baseline scenario

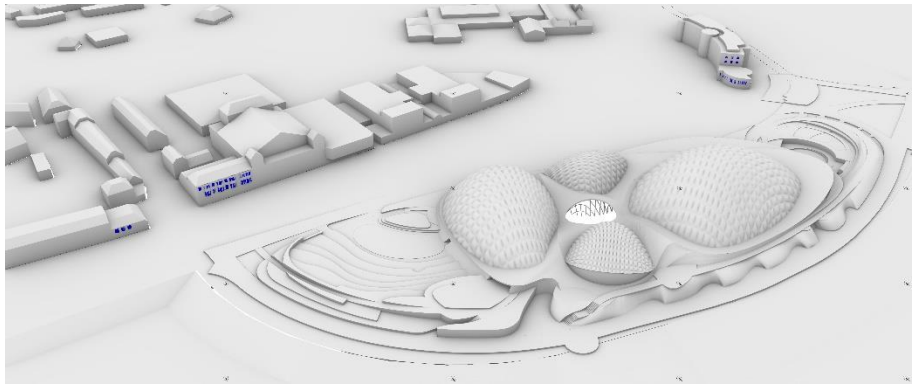


Figure 2.2 Proposed Scenario

2.2.4. Receptors for Daylight

The scoping of impacts has considered the guidance contained in the BRE Guide (Littlefair, 2011).

Paragraph 2.2.2 of the BRE Guide (Littlefair, 2011) states that the guidelines for daylight impacts are primarily for residential properties, where daylight is deemed to be required, including:

- Living rooms;
- Kitchens; and
- Bedrooms.

Paragraph 2.2.2 of the BRE Guide (Littlefair, 2011) goes on to say that the guidelines can also be applied to non-domestic buildings which have a reasonable expectation of daylight such as:

- Schools;
- Hospitals;

- Hotels/Hostels;
- Small workshops; and
- Some offices.

2.2.5. Receptors for Sunlight

Paragraph 3.1.2 of the BRE Guide (Littlefair, 2011) states that the main requirement for sunlight is in housing, particularly living rooms and conservatories. It is viewed as less important in bedrooms and kitchens, where people prefer sunlight in the morning rather than the afternoon.

In the absence of detailed internal layout information for the surrounding developments, all windows of residential properties facing within 90° of due south will be included within the assessment of effects.

Paragraph 3.1.3 of the BRE Guide (Littlefair, 2011) further states that sunlight is also valued in non-domestic buildings. However, this requirement will vary according to the type of non-domestic building, the aims of the occupants and the extent to which the occupants can control their environment.

No sensitive receptors to daylight have been identified as there are no of residential developments facing the Proposed Development within 90° of due south.

2.2.6. Receptors for Overshadowing

Paragraph 3.3.3 of the BRE Guide (Littlefair, 2011) states that the guidance is also concerned with the availability of sunlight in open space such as:

- Gardens (usually the back garden);
- Parks/playing fields;
- Children playgrounds;
- Outdoor swimming pools;
- Sitting out areas such as public squares; and
- Focal points for views.

2.3. Assessment Methodology and Significance Criteria

The methodology adopted for the study follows that set out in BRE Guide which gives criteria and methods for calculating daylight and sunlight.

The BRE Guide uses a set of parameters to quantify the potential effect on light levels: the Vertical Sky Component (VSC), the Probable Sunlight Hours (PSH) for windows. The Guide uses the hours of sunlight availability to quantify the sunlight levels in open spaces.

2.3.1. Vertical Sky Component (VSC)

The Vertical Sky Component (VSC) calculation is the ratio of the direct sky illuminance falling on the outside of a window, to the simultaneous horizontal illuminance under an unobstructed sky. The standard CIE (Commission Internationale d'Éclairage) Overcast Sky is used and the ratio is expressed as a percentage. The maximum VSC value is close to 40% for a completely unobstructed vertical wall.

The BRE Guide sets out two guidelines for the VSC:

- If the VSC at the centre of the existing window exceeds 27% with the new development in place, then enough sky light should still be reaching the existing window; and
- If the VSC with the new development in place is both less than 27% and less than 0.8 times its former value, then the reduction in light to the window is likely to be noticeable. This means that a reduction in the VSC value of up to 20% its former value would be acceptable and thus, the effect would be considered negligible.

2.3.2. Probable Sunlight Hours (PSH)

Access to sunlight is measured on the windows to habitable rooms facing within 90° of due south. The Probable Sunlight Hours (PSH) calculation method measures the proportion of the window assessed that is sunlit for a period of time. In new developments, each dwelling should have at least one main living room within 90° of due south to receive a reasonable amount of sunlight. The BRE Guide recommends that the PSH is calculated for the whole year, and for the winter months (21 September to 21 March).

If the window reference point can receive more than 25% of Annual Probable Sunlight Hours (APSH), including at least 5% of winter probable sunlight hours (WPSH) during the winter months between 21 September and 21 March, then the room should still receive enough sunlight and the effect will therefore, be negligible.

However, if the available sunlight hours are both less than the amount given above and less than 0.8 times their former value, either over the whole year or during the winter months (21 September to 21 March), then the occupants of the existing building will notice the loss of sunlight.

Further, if the overall annual loss is greater than 4% of APSH, the room may appear colder and less cheerful and pleasant.

2.3.3. Overshadowing

The summary of section 3.3 of the BRE guide states as follows:

"3. 3 .17 It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area which can receive two hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21 March."

2.3.4. Significance Criteria

The primary purpose of the daylight and sunlight assessment is to determine the likely loss of light to adjacent buildings resulting from the construction of the proposed development. Therefore, in these cases, the proposed development is identified as the potential source of effect.

The study quantifies the likely daylight and sunlight availability to the receptors identified and derives the resulting ratio of impact. The potential effects that the study accounts for include:

- Noticeable reductions in daylight that are likely to make the rooms identified to appear gloomier, and electric lighting will be needed more often. This may result in a minor to major negative effect depending on the sensitivity of the receptor;
- Noticeable reductions in sunlight to the windows identified that will make the room appear colder and less pleasant. This may result in a minor to major negative effect depending on the sensitivity of the receptor;
- Noticeable increase in daylight thus improving the visual comfort qualities of rooms identified. This would result in a minor to major positive effect depending on the sensitivity of the receptor; and
- Noticeable increase in sunlight to the windows identified that will make the rooms benefit from direct solar gains for longer, thus making the rooms appear warmer and more pleasant. This would result in a minor to major positive effect depending on the sensitivity of the receptor.

2.3.5. Key Sensitive Receptors

In order to undertake the assessment, first the key sensitive receptors around the Site need to be identified. According to the BRE Guide, sensitive receptors are described as windows to habitable rooms facing the site where the occupants have a reasonable expectation of daylight. As the BRE Guide states:

"The guidelines given here are intended for use 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".

It is evident, therefore, that the focus of the guidelines in the assessment of daylight impacts is habitable rooms within adjoining dwellings. Consideration has also been given to non-domestic buildings although these have been assigned a lower sensitivity.

The Guide further states that in designing a new development or extension to a building, care should be taken to safeguard the access to sunlight both for existing dwellings and for any nearby non-domestic buildings where there is a particular requirement for sunlight. In relation to the assessment of loss of sunlight to an existing building, the Guide suggests that:

".....all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90° of due south. Kitchens and bedrooms are less important, although care should be taken to not block too much sun. In non-domestic buildings any

spaces which are deemed to have a special requirement for sunlight should be checked; these will normally face within 90° of due south anyway……"

In the context of the BRE Guide, the guidelines for sunlight have been applied to the existing residential developments facing within 90° of due south. In the absence of internal layout information detailing the location of kitchens, bedrooms and living spaces, all receptors facing the site have been assessed.

2.3.6. Determining the Sensitivity of Receptors

Having identified the receptors (which include a mix of residential and commercial buildings) for the assessment, it is necessary to identify their sensitivity. A window sensitivity rating has been developed using professional judgement based on the BRE Guide, which is described below and categorised into high, medium and low based on the function or use of the space being assessed. This rating is indicative and there will be occasions where the sensitivity may be interpreted differently:

- Habitable rooms such as living rooms, kitchens and bedrooms within residential developments generally require good levels of daylight to render them more enjoyable and adequate to their function. Windows to such spaces are classified as having **high** sensitivity to daylight;
- Non- domestic buildings where the occupants have a reasonable expectation of daylight such as offices have been classified as having a **medium** sensitivity to daylight;
- Windows of residential dwellings have been classified as having **high** sensitivity to sunlight, particularly for living rooms and conservatories. In the absence of internal layout information of the surrounding residential developments, all windows on the façade facing the proposed development have been classified as having a high sensitivity to sunlight as a 'worst case' scenario;
- The windows of the surrounding non-domestic buildings have been classified as having a **low** sensitivity to sunlight; and
- Windows on communal entrances to flat have been excluded from the assessment, as these are classified as having **no** sensitivity to daylight.

For the purpose of this assessment, given the nature of the locality, only receptors with **high** and **medium** sensitivity have been assessed.

2.3.7. Determining Magnitude of Change

As per the BRE Criteria for daylight, sunlight and overshadowing, compliance with the criteria is either achieved or not. However, the Guide does not provide criteria for determining the magnitude of the change. The compliance criteria for the effects on the surrounding development are detailed in the section below, alongside how the magnitude of change has been determined using professional judgement.

2.3.8. Compliance Criteria and Magnitude of change

The BRE criteria have been used to assess the likely levels of daylight and sunlight to habitable rooms in the surrounding properties. Compliance with the BRE Guide is achieved if the levels of daylight/sunlight within the identified receptors of the surrounding properties are equal to or greater than the absolute values established by the Guide.

Compliance with the BRE Guide is also achieved for the identified receptors of the surrounding properties if the ratio of impact between the baseline and proposed scenarios is 0.80 or higher, i.e. the reduction in daylight or sunlight hours is 20% or less. An additional criterion of overall annual loss for APSH values also needs to be satisfied to comply with the recommended BRE guidelines.

A negligible magnitude of change is established if compliance with the BRE criteria is met.

For the affected receptors that lie below the recommended BRE guidelines, the magnitude of change has been classified using professional judgement depending on the ratio of impact between the baseline and proposed scenarios. The criteria used for determining the magnitude of change for the VSC, APSH and WPSH results has been detailed below (Tables 2.2, 2.3 and 2.4).

VSC Values	Ratio of Impact	Magnitude of change
VSC ≥ 27%	≥ 0.8	Negligible
VSC ≥ 27%	< 0.8	Negligible
VSC < 27%	> 0.8	Negligible
VSC < 27%	0.7 – 0.8	Low
VSC < 27%	0.6 – 0.7	Medium
VSC < 27%	< 0.6	High

Table 2.2: Determination of the Magnitude of change for Vertical Sky Component (VSC) Results

APSH Values	Ratio of Impact	Absolute reduction in	Magnitude of change
APSH ≥ 25%	>0.8	≤ 4%	Negligible
APSH ≥ 25%	>0.8	> 4%	Negligible
APSH ≥ 25%	<0.8	> 4%	Negligible
APSH < 25%	>0.8	≤ 4%	Negligible
APSH < 25%	>0.7	>4%	Low
APSH < 25%	0.6 – 0.7	>4%	Medium
APSH < 25%	< 0.6	>4%	High

Table 2.3: Determination of the Magnitude of change for Annual Probable Sunlight Hours (APSH) Results

WPSH Values	Ratio of Impact	Magnitude of change
WPSH ≥ 5%	>0.8	Negligible
WPSH ≥ 5%	<0.8	Negligible
WPSH < 5%	>0.8	Negligible
WPSH < 5%	0.7 – 0.8	Low
WPSH < 5%	0.6 – 0.7	Medium
WPSH < 5%	< 0.6	High

Table 3.4: Determination of the Magnitude of change for Winter Probable Sunlight Hours (APSH) Results

% of area achieving > 2hrs of sun on 21st March	Ratio of Impact	Magnitude of change
≥ 50%	>0.8	Negligible
≥ 50%	<0.8	Negligible
< 50%	>0.8	Negligible
< 50%	0.7 – 0.8	Low
< 50%	0.6 – 0.7	Medium
< 50%	< 0.6	High

Table 4.4: Determination of the Magnitude of change for Overshadowing Results

3. Effect on Daylight Levels

A summary of the Vertical Sky Component results and the magnitude of change for the assessed receptors is provided in table 3.1 below.

Table 3.1 Daylight results summary

Receptor	Windows	Above BRE Criteria		Below BRE (Low)		Below BRE (Medium)		Below BRE (High)	
Name	Num	Num	%	Num	%	Num	%	Num	%
The Midland - Hotel	18	18	100	0	0	0	0	0	0
Apartment above Bedland - Marine Rd Central	8	8	100	0	0	0	0	0	0
Apartment above Brucciani - Marine Rd Central	8	8	100	0	0	0	0	0	0
Apartment above Costa - Marine Rd Central	8	8	100	0	0	0	0	0	0
Apartment above Troutflies - Marine Rd Central	7	7	100	0	0	0	0	0	0
223 Marine Rd Central	3	3	100	0	0	0	0	0	0
Total	**52**	**52**	**100**	**0**	**0**	**0**	**0**	**0**	**0**

All the receptors are well within the BRE criteria for daylight, which means that no negative effects have been identified on daylight levels of the surrounding properties and all the receptors receive adequate levels of daylight.

A complete set of results are reported in Appendix 1 of this report.

4. Effect on Overshadowing Levels

The overshadowing assessment has been conducted for the seaside walk north of the Propose Development. Results show that the Proposed Development has a negligible impact on overshadowing level of the pier walk north of the proposed development.

A summary of the magnitude of change for the assessed receptor has been provided below.

Receptor	Baseline (%)	Proposed (%)	Ratio of Impact	BRE Compliance
Name	Area receiving >2hrs of sun on 21st March		_	_
Pier Walk	99.72	94.32	0.95	Above

Table 4.1 Overshadowing results summary

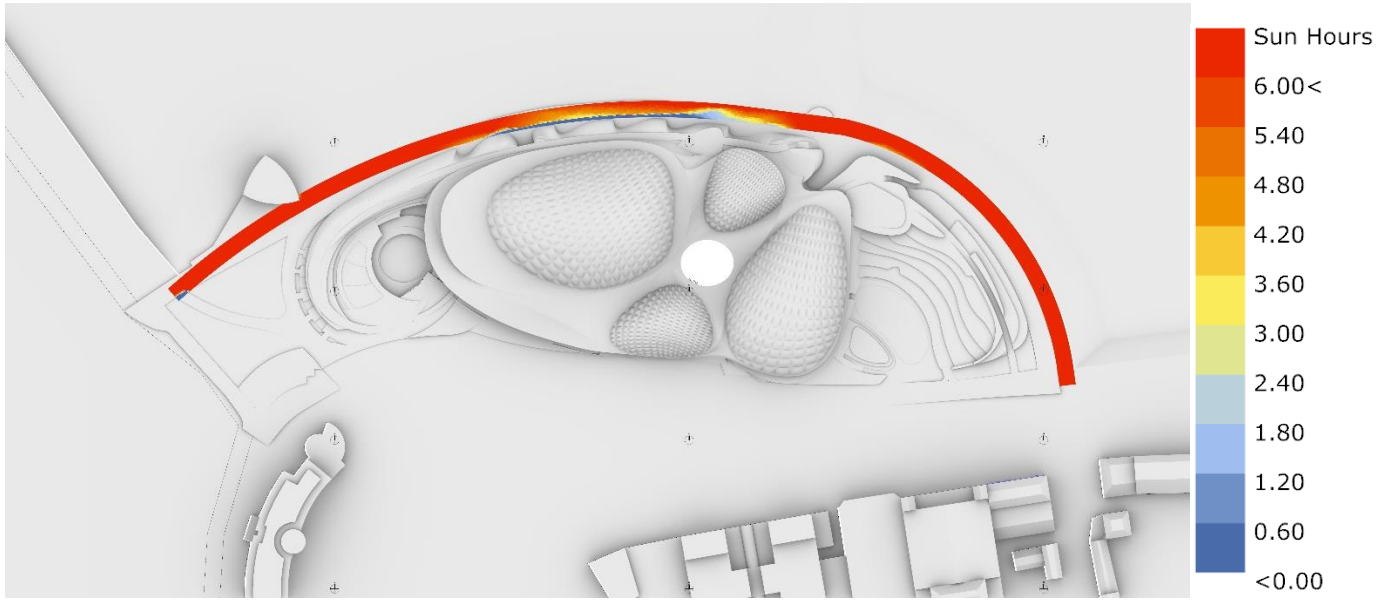


Figure 2.2 Number of sun hours reaching the ground on 21st March- Proposed Scenario

5. Conclusions

Hilson Moran has been commissioned by Eden Project International Ltd. to undertake a daylight impact assessment to support the proposed development of Eden Project North, located in Morecombe.

The daylight assessment has been conducted for receptors of the surrounding domestic and hospitality buildings. Impacts on retails units had been excluded as they are not sensitive receptors to daylight and sunlight.

The results of the daylight, sunlight and overshadowing assessments have indicated that the proposed development has a negligible effect on all of the surrounding developments and outdoor areas and the development has been designed in line with the BRE guidance.

Appendix 1 Detailed modelling results

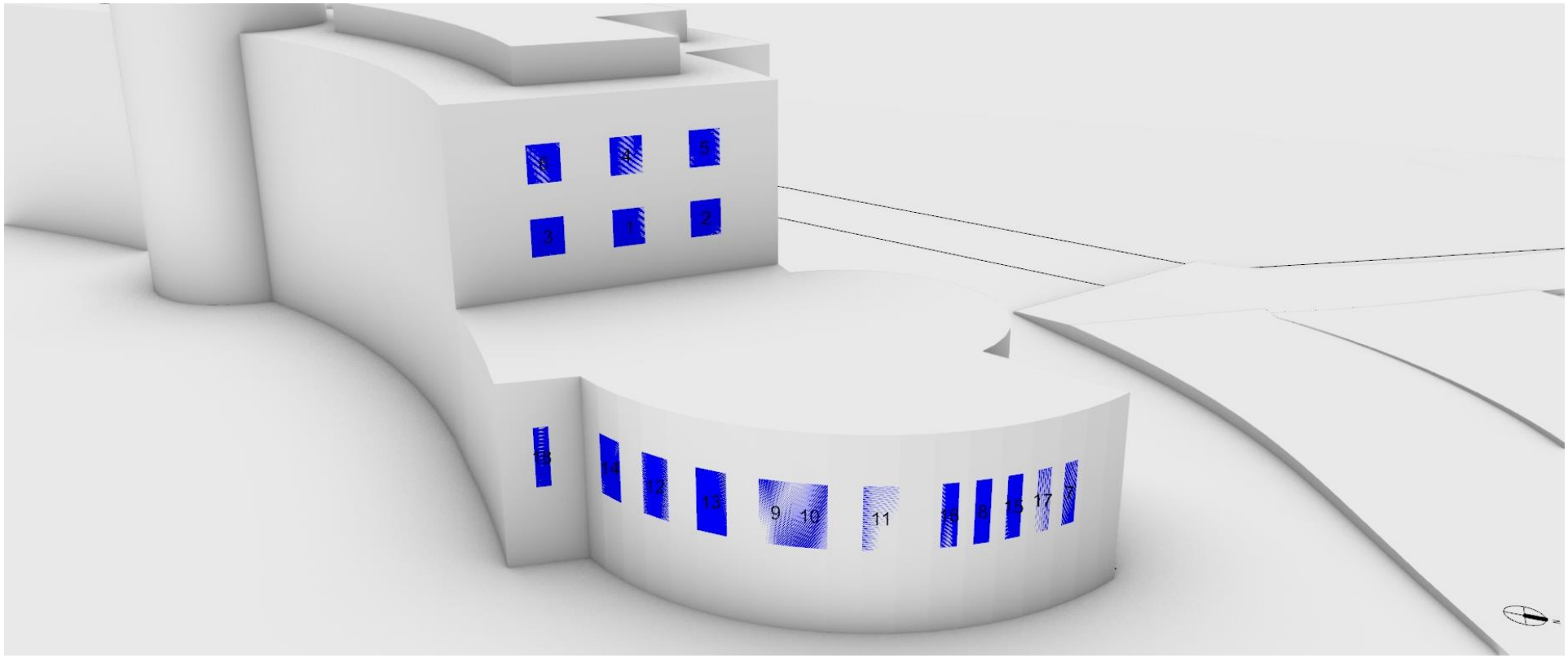


Figure 3: 17. The Midland - Hotel(West Elevation)

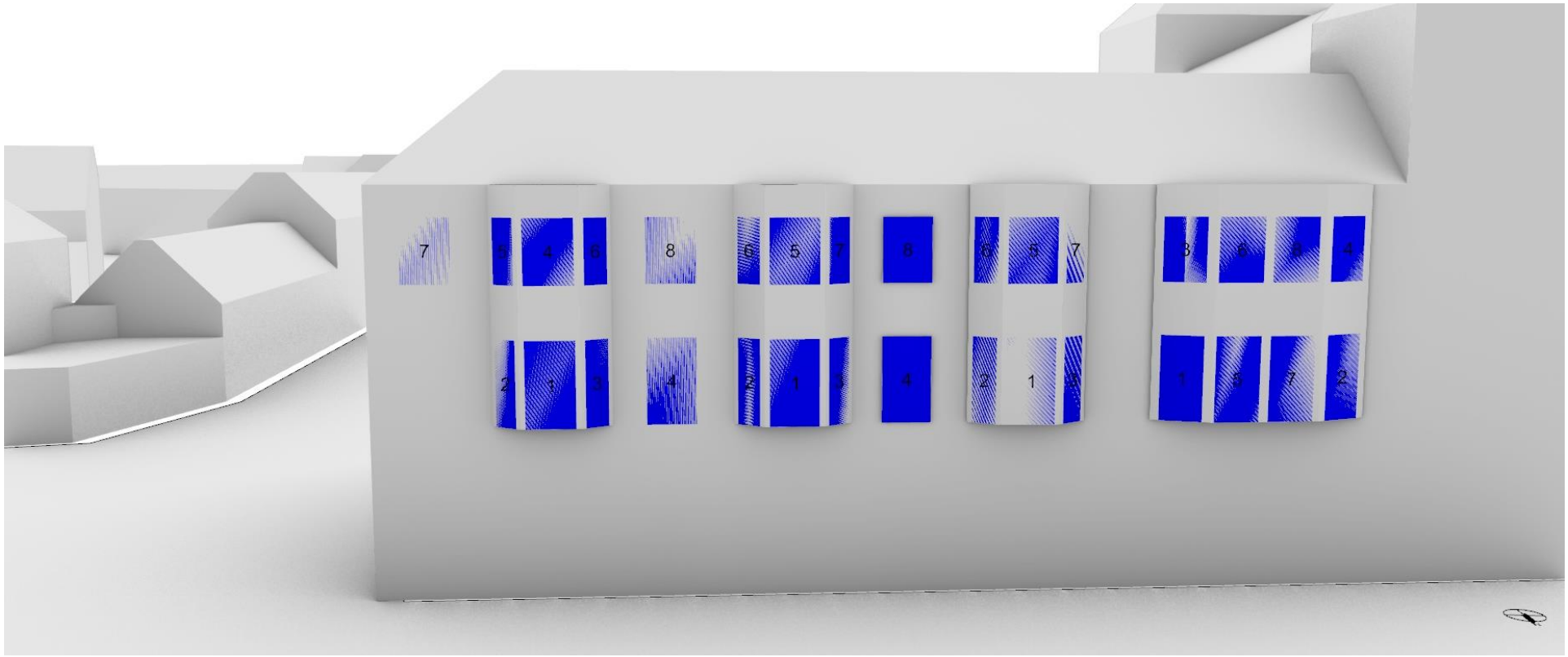


Figure 4: 17. From left to right: Apartment above Troutflies - Marine Rd Central; Apartment above Costa - Marine Rd Central; Apartment above Brucciani - Marine Rd Central and Apartment above Bedland - Marine Rd Central

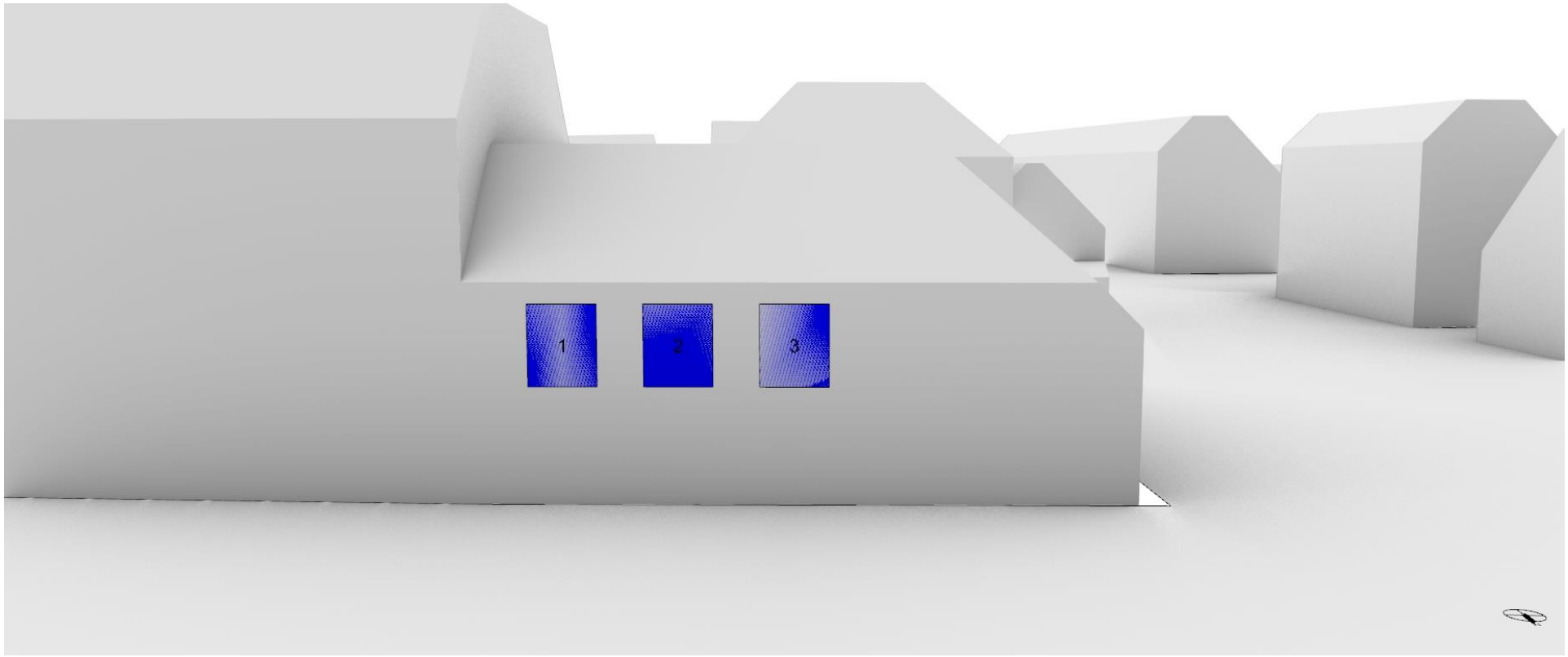


Figure 5: 18. 223 Marine Rd Central

Detailed Daylight Results

Receptor	Window	Baseline	Proposed	Ratio of impact	BRE Compliance	Magnitude of Change
Name	Num	%	%	-	-	-
The Midland - Hotel	1	39	38.3	0.98	Above	Negligible
	2	39	38.4	0.98	Above	Negligible
	3	39	38.3	0.98	Above	Negligible
	4	39.1	38.5	0.99	Above	Negligible
	5	39.1	38.5	0.99	Above	Negligible
	6	39	38.5	0.99	Above	Negligible
	7	39	37.7	0.97	Above	Negligible
	8	38.9	37.5	0.97	Above	Negligible
	9	38.8	37.6	0.97	Above	Negligible
	10	38.8	37.5	0.97	Above	Negligible
	11	38.8	37.5	0.97	Above	Negligible
	12	38.3	37.5	0.98	Above	Negligible
	13	38.7	37.7	0.98	Above	Negligible
	14	35.4	34.9	0.98	Above	Negligible
	15	38.9	37.6	0.97	Above	Negligible
	16	38.9	37.5	0.96	Above	Negligible
	17	38.9	37.6	0.97	Above	Negligible
	18	34.4	33.1	0.96	Above	Negligible

Apartment above Bedland - Marine Rd Central	1	37.5	37.1	0.99	Above	Negligible
	2	38.1	37.2	0.98	Above	Negligible
	3	38.2	37.8	0.99	Above	Negligible
	4	38.2	37.5	0.98	Above	Negligible
	5	39.1	38.4	0.98	Above	Negligible
	6	39.1	38.6	0.99	Above	Negligible
	7	39.1	38.4	0.98	Above	Negligible
	8	39.1	38.6	0.99	Above	Negligible
Apartment above Brucciani - Marine Rd Central	1	39.1	38.4	0.98	Above	Negligible
	2	35.6	35.4	0.99	Above	Negligible
	3	35.2	34.3	0.97	Above	Negligible
	4	38.3	37.7	0.98	Above	Negligible
	5	39.1	38.6	0.99	Above	Negligible
	6	36.8	36.7	1	Above	Negligible
	7	36.4	35.7	0.98	Above	Negligible
	8	38.6	38.1	0.99	Above	Negligible
Apartment above Costa - Marine Rd Central	1	39.1	38.5	0.98	Above	Negligible
	2	35.4	35.3	1	Above	Negligible
	3	35.2	34.4	0.98	Above	Negligible
	4	38.2	37.7	0.99	Above	Negligible
	5	39.1	38.7	0.99	Above	Negligible
	6	36.6	36.4	1	Above	Negligible

	7	36.4	35.8	0.98	Above	Negligible
	8	38.5	38.1	0.99	Above	Negligible
Apartment above Troutflies - Marine Rd Central	1	39.1	38.6	0.99	Above	Negligible
	2	36.5	36.4	1	Above	Negligible
	3	35.4	34.7	0.98	Above	Negligible
	4	39.1	38.7	0.99	Above	Negligible
	5	37.1	37	1	Above	Negligible
	6	36.6	36	0.98	Above	Negligible
	7	38.8	38.5	0.99	Above	Negligible
223 Marine Rd Central	1	39.1	38.8	0.99	Above	Negligible
	2	39.1	38.8	0.99	Above	Negligible
	3	39.1	38.8	0.99	Above	Negligible