

Donna Williams

Subject: FW: 55 Vastern Rd, Reading (200188)
Attachments: 200188 Environment Agency response 127747.pdf; P117635-1000 Vastern Road daylight review.pdf; BRE Review of Wind Microclimate Assessment of 55 Vasten Road Reading.pdf

From: Markwell, Jonathan <Jonathan.Markwell@reading.gov.uk>

Sent: 15 April 2020 17:17

To: Caroline McHardy <Caroline.McHardy@berkeleygroup.co.uk>; Craig Pettit <Craig.Pettit@bartonwillmore.co.uk>

Subject: [EXTERNAL] 55 Vastern Rd, Reading (200188)

OFFICIAL

Dear Mr Pettit / Ms McHardy,

Further to previous correspondence, please see attached the following responses received whilst I was on leave:

- Environment Agency, who have raised a number of significant concerns, culminating in an objection to the scheme. I will await your response prior to further engaging the EA. I have also forwarded these observations onto my Natural Environment and Ecology colleagues, to help inform their future comments.
- BRE day/sunlight. This raises various shortcomings, both in terms of the impacts on existing nearby occupiers and future occupiers. In short, you are provided with an opportunity to respond to the various issues BRE has raised and submit an addendum report which seeks to respond to the various action points BRE raise. If this facilitates changes to the internal/external layout/design of buildings, then revised plans should be submitted at the same time. This response is fed in on a strictly 'notwithstanding various other internal/external consultee responses which are still awaited' basis, as explained in earlier correspondence. It is entirely up to you as to whether you seek to respond to these matters individually at this juncture, or hold off until I am in a position to provide overarching feedback on the proposals as a whole (which, for the avoidance of doubt, I am not yet in a position
- BRE wind/microclimate. This raises a number of concerns which you are provided with an opportunity to respond to (similar to the other responses above). Moreover, I would also reiterate my previous concerns raised in relation to the report not taking into account under consideration applications to the south of the site (at Vastern Court (ref 200328) and 80 Caversham Road (ref 182252)). I would anticipate that any future submission by you to take into account these nearby developments so BRE can include this as part of any future further assessment.

I trust that these updates are of assistance to you and look forward to hearing from you in due course on these unresolved issues.

Yours sincerely,

Jonathan Markwell
Principal Planning Officer
Planning Section | Directorate for Economic Growth and Neighbourhood Services

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Mr. Jonathan Markwell
Reading Borough Council
Development Control
PO Box 17
Reading
Berkshire
RG1 7TD

Our ref: WA/2020/127747/01-L01
Your ref: 200188
Date: 14 April 2020

Dear Jonathan Markwell

Demolition of existing structures and erection of a series of buildings ranging in height from 1 to 11 storeys, including residential dwellings (C3 use class) and retail floor space (A3 use class), together with a new north-south pedestrian link, connecting Christchurch bridge to Vastern Road.

55 Vastern Road Reading RG1 8BU

Thank you for consulting us on the above application, on 17 March 2020.

We have reviewed the following documents:

- Flood Risk Assessment (FRA) produced by Stantec dated January 2020
- Phase I-II Geo-Environmental Site Assessment 55 Vastern Road Reading Berkshire RG1 8BU by Omnia dated November 2019
- The Old Power Station, Vastern Road, Reading Proposed Drainage Strategy by Stantec dated January 2020.
- Ecological Assessment by Ecoconsult, December 2019
- Design & Access Statement by Berkeley Homes, Oxford and Chiltern Ltd, January 2020

Environment Agency position

We object to the development proposed as part of this planning application due to its likely effect on the River Thames. This habitat (Rivers) is listed as being of 'principal' importance under s41 of the Natural Environment and Rural Communities (NERC) Act 2006. Insufficient information has been provided to assess the risks posed by this. We therefore recommend that planning permission is refused.

Reason(s)

England's Biodiversity strategy identifies those priority habitats which are also listed as being of 'principal' importance under section 41 of the NERC Act 2006. This Act states that local planning authorities must consider these habitats in their decision-making, because of their duty to conserve biodiversity (section 40).

Cont/d..

In this instance, the proposed development may have a detrimental effect on a priority habitat that we have a role in protecting. The application does not include adequate information about the measures proposed to assess and address the risk to ensure protection of the river in this location. In particular the application fails to address adequately the issue of tall buildings shading the river and its marginal habitat.

This objection is supported by paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Opportunities to incorporate biodiversity in and around developments should be encouraged.

The Design & Access Statement (DAS) refers in paragraph 2.8.5 to an Environment Agency No Build Zone 8m from the river edge and a Reading Borough Council Policy Buffer 10m from the river edge. It should be noted that the 8m buffer refers to the Land Drainage Byelaws, but for ecological purposes, this buffer should be a minimum of 10m, and depending on the site and circumstances, could be more.

Paragraph 2.8.4 of the DAS shows building heights along the river on either side of the application site as being three or four storeys tall, with the anomalies of Clearwater Court and Reading Bridge House on either side of Reading Bridge being taller. The illustration on page 90 of the DAS show the two buildings closest to the river being 10 storeys and 8 storeys high, much taller than those on either side. Being on the southern bank of the river, these tall buildings would cast shade over the river and, in particular, the marginal planting established along this southern bank as part of the mitigation measures for the construction of Christchurch Bridge.

In Appendix 5 (Transient Overshading) of the Daylight/Sunlight Report (EB7, 19 December 2019), the diagrams appear to suggest significant shading of the river/river banks throughout much of the year, although the full width of the river is not shown. The Ecological Assessment (Ecoconsult, December 2019) deals with shading in paragraphs 7.2.2 to 7.2.5 stating that not all parts of the river will be shaded throughout the day and that shading will be less in summer than in winter, but does not address the issue of shading of the marginal vegetation on the southern bank. This report states in paragraph 7.2.4 that the River Thames in Reading has been greatly modified, has hard banks and lacks natural riparian habitat (such as woodland, marsh, swamp, individual trees and marginal vegetation). This gives additional value to the marginal vegetation that has been established on the southern bank. Arguing that other buildings already cast shade, does not make it acceptable to cast more shade, particularly on one of the very few areas of marginal vegetation on the Thames through Reading. Referring to maps from over a hundred years ago saying that there were once trees here, and trees cast shade, is a tenuous excuse for allowing such an extent of shading now.

In our responses to previous consultations from the applicant and from Reading BC, we stated that the marginal vegetation in this location should not be impacted by shading and that the tallest part of the development should be towards the road in order to minimise the impacts, but this does not appear to have been taken on board.

With regard to the proposed green buffer between the development and the river, this should be free from built development, hard standing and formal landscaping and should be designed to provide a net gain in biodiversity. Additionally, planting should

use locally native species of UK genetic provenance. Drawings 448.LA.101 Rev A (Landscape General Arrangement Plan) and 448.LA.102 Rev A show, however, that much of the buffer would have amenity grass rather than wildflower grass. Where a species rich grass mix is proposed, this uses a wet grassland mix and is further up the slope from the towpath than the amenity grass where it would be unlikely to get wet.

With regard to the stated 'native' riparian shrub mix, several species are not native, or not suitable. *Cornus alba* is non-native, *Cornus avellana* does not exist (perhaps *Corylus avellana* was intended) and *Salix lanata* is native to the UK, but is a mountain plant found in the uplands of Scotland and is not suited to this location. These should be removed from the planting mix. With regard to the trees proposed, *Quercus palustris* is non-native and should be replaced with one of the UK's native oak species and the proposed *Alnus glutinosa* can be affected by phytophthora root disease and planting them can run the risk of importing this to areas currently unaffected. Consideration should be given to substituting this species for another native riparian tree species. *Betula nigra* is again non-native and should be replaced with the native *Betula pendula*.

The buffer zone along the river is very narrow in relation to the height of the buildings, particularly as this has the existing towpath within it. To give a meaningful gain in biodiversity, this buffer should be wider and have a greater emphasis on native species. The corridor leading from Vastern Road to the river should be greener and more biodiverse than is currently shown to benefit people and wildlife.

Overcoming our objection

It may be possible to overcome our objection by submitting:

- Detailed drawings showing the buildings nearest the river being significantly reduced in height or moved a greater distance from the river in order to reduce the impact of shading of the river and its margins.
- Details of an amended landscape plan for a greater width of buffer and a planting scheme using locally native species of UK genetic provenance.

Advice for Applicant

Should you wish us to review any technical documents or want further advice to address the environmental issues raised above, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application. It should also result in a better quality and more environmentally sensitive development.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The terms and conditions of our charged for service are available [here](#).

If you would like more information on our planning advice service, including a cost estimate, please contact us.

Advice for Local Planning Authority

Please note we also have issue with this application regarding flood risk and contaminated land. We will address these through recommended conditions if the above objection can be overcome.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations. Should our objection be removed, we will recommend the inclusion of conditions on any subsequent approval.

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

We are reliant on the accuracy and completeness of the reports in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours faithfully

Kirsty Macpherson
Planning Specialist

Direct dial 02030256243
E-mail Planning_THM@environment-agency.gov.uk

BRE Client Report

Review of daylight and sunlight report for River Gate, 53-55 Vastern Road, Reading

Prepared for: Reading Borough Council
Date: 7 April 2020
Report Number: P117635 Issue: 1

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Position Associate Director

Date 07 April 2020

Signature

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Executive Summary

A planning application, reference 200188, has been submitted to Reading Borough Council for a proposal to redevelop 53-55 Vastern Road, Reading for a mixed use development. An assessment of the daylight and sunlight impact of the proposed development and daylight and sunlight provision to the new flats is contained in a report by Eb7, titled 'Daylight & Sunlight Report, River Gate, 53-55 Vastern Road, Reading' and dated 19th December 2019. BRE have been commissioned by Reading Borough Council to evaluate this report. The evaluation was to review the scope, methodology, text and conclusions of the report, but not verification of the calculations.

The Eb7 report evaluates loss of daylight and sunlight to existing properties using the BRE Report 'Site Layout Planning for Daylight and Sunlight, a guide to good practice'. This source is appropriate and is widely used by local authorities to help determine planning applications. The guidance is advisory in nature and is intended to assist with good design. There is no formal requirement to comply with the advice it contains. The BRE Report states that its own numerical guidelines '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.'

The existing residential properties most likely to be affected by the proposals have been assessed. Other nearby residential locations would be less affected.

42 windows at 2-28 Lynmouth Road would have a loss of daylight characterised as minor adverse. Some of these are secondary windows, and some of the losses would be only marginally outside the guidelines. The windows affected are principally on the end of the rear additions, with some on the main rear elevations. Number 2 and number 24 are more affected than the other properties in the terrace and would have larger losses of light which could be characterised as major adverse. These have overhangs which limit the amount of daylight they can receive, which would be a mitigating factor.

There would be losses of winter sunlight outside the guidelines to three properties in the terrace. We would consider the impact on sunlight to be minor adverse.

There would be a minor adverse loss of daylight to just one window at 6 Lynmouth Court. Loss of sunlight would be within the guidelines.

7-12 Lynmouth Court is the building which would be most affected by the proposals. This building would have a moderate adverse loss of daylight. Some of the rooms have less affected windows on other elevations, which would be a mitigating factor. Loss of sunlight would be largely within the guidelines.

51 Vastern Road would have a minor to moderate adverse impact to windows on its side elevation. However, drawings submitted as part of a recent planning application suggest that none of them are main windows lighting habitable rooms which would be covered by the BRE guidelines.

Gardens at 2, 4 and 8 Lynmouth Road, and at 3 Lynmouth Court, would have a loss of sunlight outside the guidelines. The losses would be major for 2 Lynmouth Road, moderate for 4 Lynmouth Road and 3 Lynmouth Court, and minor with mitigating factors for 8 Lynmouth Road. 2 Lynmouth Road would be particularly affected. It would lose all of its area capable of receiving the recommended amount of sunlight, though the garden is small and has walls around it which limit sunlight.

There are some living rooms within the proposed development which would have average daylight factors well below the recommended minimum, going as low as 0.3%. These will be extremely gloomy, particularly in the cases where they would not receive any sunlight either. In some case, the windows are



subject to low levels of external obstruction and the poor daylighting is therefore a consequence of the development's own design.

We disagree that the very poor results should be accepted as isolated deviations and suggest that the design should be revisited to see if rooms which fall well short of the recommended amount of daylight can be improved through measures such as changes to window design or room arrangement.

Some south facing windows in Block A fall only marginally short of the recommended amount of daylight, but their design renders them vulnerable to substantial future loss of light from an emerging development proposal for the Vastern Road retail park. Where an increase in future obstruction is likely, the design could protect the future occupants by not rendering their windows dependent on an area of the sky which is likely to be blocked, for example by providing additional glazing which is not located underneath a balcony.

74% of the living rooms in Block A, 52% of Block BC, 42% of Block D and 68% of Block EFG would have a window facing within 90° of due south. Blocks D and EFG have living rooms with views of the River Thames, which is likely to be equally acceptable. Living room windows facing within 90° of due south generally receive the recommended amount of sunlight. The exception is ground floor windows in Block EFG, which are heavily obstructed by other blocks in the development.

All of the amenity areas in the proposed development would receive the recommended amount of direct sunlight.



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1 Introduction

- 1.1.1 A planning application, reference 200188, has been submitted to Reading Borough Council for a proposal to redevelop 53-55 Vastern Road, Reading for a mixed use development. An assessment of the daylight and sunlight impact of the proposed development and daylight and sunlight provision to the new flats is contained in a report by Eb7, titled 'Daylight & Sunlight Report, River Gate, 53-55 Vastern Road, Reading' and dated 19th December 2019.
- 1.1.2 BRE have been commissioned by Reading Borough Council to evaluate this report. The evaluation was to review the scope, methodology, text and conclusions of the report, but not verification of the calculations. This report gives the results of the evaluation.
- 1.1.3 A site visit was not carried out, but we have some familiarity with the location from previous site visits in the locality.

2 Evaluation criteria

2.1 Loss of light to existing dwellings

- 2.1.1 The Eb7 report evaluates loss of daylight and sunlight to existing properties using the BRE Report 'Site Layout Planning for Daylight and Sunlight, a guide to good practice'¹. This source is appropriate and is widely used by local authorities to help determine planning applications. The guidance is advisory in nature and is intended to assist with good design. There is no formal requirement to comply with the advice it contains.
- 2.1.2 The BRE Report states that its own numerical guidelines '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 a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings'.
- 2.1.3 The National Planning Policy Framework² states that 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 (as long as the resulting scheme would provide acceptable living standards).
- 2.1.4 The guidelines apply to rooms where daylight is required, including living rooms, kitchens and bedrooms. Toilets and bathrooms are not included.

2.2 Loss of daylight to windows

- 2.2.1 To assess the impact on the amount of diffuse daylighting entering existing buildings, and sunlight where relevant, the Report first recommends the measurement or calculation of obstruction angle. This is the angle to the horizontal subtended by the new development at the centre of the lowest window in each affected window wall, in a plane perpendicular to it. If this angle is less than 25° for the whole of the development, then the new building would not have a substantial effect on the diffuse skylight (or sunlight) enjoyed by the existing building.

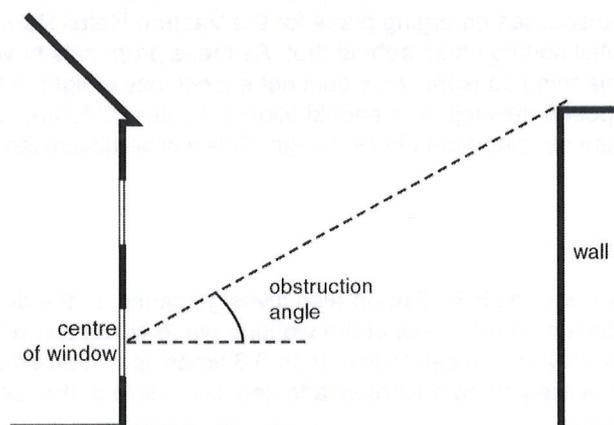


Figure 1 Example of obstruction angle



- 2.2.2 Where the obstruction angle exceeds 25°, a calculation is needed to assess the impact on the amount of diffuse daylighting entering existing buildings. The Report recommends the calculation of the vertical sky component (VSC). This 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 Overcast Sky³ is used and the ratio is usually expressed as a percentage. The maximum value is almost 40% for a completely unobstructed vertical wall. The vertical sky component on a window is a good measure of the amount of daylight entering it.
- 2.2.3 The BRE Report sets out the following two guidelines for vertical sky component:
- Where the vertical sky component 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.
 - Where the vertical sky component with the new development is both less than 27% **and** less than 0.8 times its former value, then the area lit by the window is likely to appear more gloomy, and electric lighting will be needed for more of the time.
- 2.2.4 The guidelines describe losses in terms of ratio as VSC (and also annual probable sunlight hours) are themselves percentage values. The Eb7 report describes losses of VSC in terms of percentage, with a 20% loss being equivalent to a ratio of 0.8. To avoid confusion, in this report we will discuss losses in the same terms as the Eb7 report. If we refer to an actual value of VSC, we will place the percentage symbol in brackets.
- 2.2.5 Average daylight factor (ADF) is not generally recommended for use in assessment in loss of daylight by the BRE Report. There are some situations where meeting a set ADF target can be appropriate for loss of light, for example where the existing building is proposed but not built. In this scenario, the incoming residents would not have the opportunity to become accustomed to the original levels of daylight. This would not apply to the properties which have been assessed in this case, and the ADF results provided for them cannot be considered in the context of the guidance in the BRE Report. Additionally, as ADF calculations require information on room dimensions and these have been estimated, the results would be subject to considerable inaccuracy.
- 2.2.6 There are some neighbouring properties which are proposed and not built in this case; the design and access statement discusses emerging plans for the Vastern Retail Park to the south of the site, and for the Royal Mail sorting office behind that. As these proposals have not reached the point of seeking planning consent, we would not expect loss of light to them to be considered. However, the proposed development should allow for potential future loss of light to its own rooms arising from these developments in its design. This will be discussed further in the section on daylight provision.

2.3 Daylight distribution

- 2.3.1 Where room dimensions are known, the BRE Report also gives guidance on the distribution of light in the existing buildings, based on the areas of the working plane which can receive direct skylight before and after. If this area is reduced to less than 0.8 times its value before, then the distribution of light in the room is likely to be adversely affected, and more of the room will appear poorly lit.



- 2.3.2 Daylight distribution assessment is only recommended by the BRE Report where room layouts are known. Calculations based on estimated room dimensions are liable to considerable inaccuracy, and in these circumstances, we would place more reliance on results for the windows.
- 2.3.3 However, the Eb7 report has provided room uses at 4, 10, 16 and 20 Lynmouth Road, which suggests that room dimensions are known for those properties. These will provide a reasonable guide to room layouts in other parts of the terrace, and we would therefore have more confidence in the daylight distribution results than if no room uses were known. Room uses are also provided for 51 Vastern Road. Daylight distribution results for Lynmouth Court are more uncertain.

2.4 Loss of sunlight to windows

- 2.4.1 The BRE Report recommends that loss of sunlight should be checked for main living rooms of dwellings, and conservatories, if they have a window facing within 90° of due south.
- 2.4.2 According to the BRE Report, if the centre of the window can receive more than one quarter of annual probable sunlight hours, including at least 5% of annual probable sunlight hours (APSH) in the winter months between 21 September and 21 March, then the room should still receive enough sunlight. If the window already receives less than this, a reduction to less than 0.8 times its current value and a reduction of more than 4% of annual probable sunlight hours over the year may lead to the room it serves appearing colder and less cheerful and pleasant.
- 2.4.3 Although the Eb7 report describes losses of VSC in percentage values, it describes losses of sunlight as ratios in the same format as the BRE guidelines.
- 2.4.4 All of the windows facing within 90° of due south have been assessed for loss of sunlight. This is appropriate when room uses are not known.

2.5 Daylight and sunlight provision to proposed dwellings

- 2.5.1 Daylight and sunlight provision to the proposed properties is normally evaluated using British Standard 8206-2:2008 'Code of Practice for Daylighting'⁴ and supplementary guidance in the BRE Report.
- 2.5.2 The Standard contains guidance on daylight and sunlight for new dwellings, including recommended minimum values for Average Daylight Factor (ADF) and Annual Probable Sunlight Hours (APSH).
- 2.5.3 The Standard has recently been withdrawn following the publication of BS EN 17037:2018 'Daylight in buildings', but it is likely that assessments using BS 8206 Part 2 will still be submitted for some time as projects which were underway at the time of the change are completed. The guidance in the BRE Report has not yet been revised and still refers to BS 8206 Part 2. We would therefore consider it reasonable for applicants to continue to submit assessments using BS 8206 Part 2 at this time.

2.6 Daylight provision

- 2.6.1 For daylight provision in new dwellings, the British Standard recommends the following minimum values for ADF:
- Bedrooms 1.0%



- Living rooms 1.5%
- Kitchens 2.0%

2.6.2 These are minimum values. The Standard states that if a space has an ADF of 5% it will not normally need supplementary electric lighting provided the uniformity is satisfactory, and that an ADF of 2-5% will normally need supplementary electric lighting.

2.6.3 Where a room has a shared use, the British Standard states that the higher minimum value should apply. However, local authorities frequently accept the living room standard for a shared kitchen/living room on the basis that a small kitchen would not be considered a habitable room. We have considered an ADF of 1.5% or better to represent a pass in this review.

2.6.4 The average daylight factor is calculated using the formula

$$D = \frac{T W \theta M}{A(1 - R^2)} \%$$

Where:

T = transmittance of glass – a typical value for double glazing might be 0.68.

W = net area of window glass (not including frames).

M = maintenance factor, allowing for effects of dirt. For a window in a suburban area without a significant overhang and which is cleaned regularly, this might be 0.96.

A = total area of indoor surfaces: floor + ceiling + walls including windows.

R = average reflectance of the area A. For a fairly light coloured room the BRE Report suggests a value of 0.5. Alternatively, individual reflectance values can be used. If individual reflectances are used, this assumes that those light coloured finishes will be used and maintained in the rooms. For other developments, where the applicant does not have control over the choice of interior wall finishes, use of the standard 0.5 is most appropriate.

θ = visible sky angle, measured from the centre of the window in the vertical plane normal to the window. This must be expressed in degrees. The BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice', Appendix C, gives a method to calculate an equivalent θ from the vertical sky component where obstructions are discontinuous.

2.6.5 The stated window transmittance value provided in the Eb7 report is reasonable. The maintenance factor used has not been provided. The interior reflectance values are those quoted in BS 8206 for surfaces in pristine condition and do not allow for normal build up of interior dirt. The results are therefore likely to overestimate the ADFs actually achievable in practice.

2.7 Sunlight provision

2.7.1 For sunlight, BS 8206-2 recommends that interiors where the occupants expect sunlight should receive at least 25% of annual probable sunlight hours, including at least 5% in the winter months between 21 September and 21 March. This would normally be the main living room of a dwelling.

2.7.2 The sunlight guidance applies to living rooms of all orientations, although a north facing room would not be expected to receive the recommended amount. Eb7 have only assessed living rooms facing within 90° of due south. This is not unreasonable, but it means that living rooms on



other elevations can only be assumed to not receive the recommended amount of sunlight when a window facing just north of west might still receive an appreciable amount.

2.8 Overshadowing

- 2.8.1 For outdoor amenity areas, the 2011 edition of the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice' recommends that at least half of the space should receive at least two hours of sunlight on 21 March. Sunlight at an altitude of 10° or less does not count.
- 2.8.2 If as a result of new development less than half of an existing garden or amenity area receives two hours of sunlight and the area that does is reduced to less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.

3 Loss of daylight and sunlight

3.1 Properties assessed

3.1.1 The proposed buildings and the neighbouring residential properties are shown in Figure 2 below, reproduced from the Eb7 report.

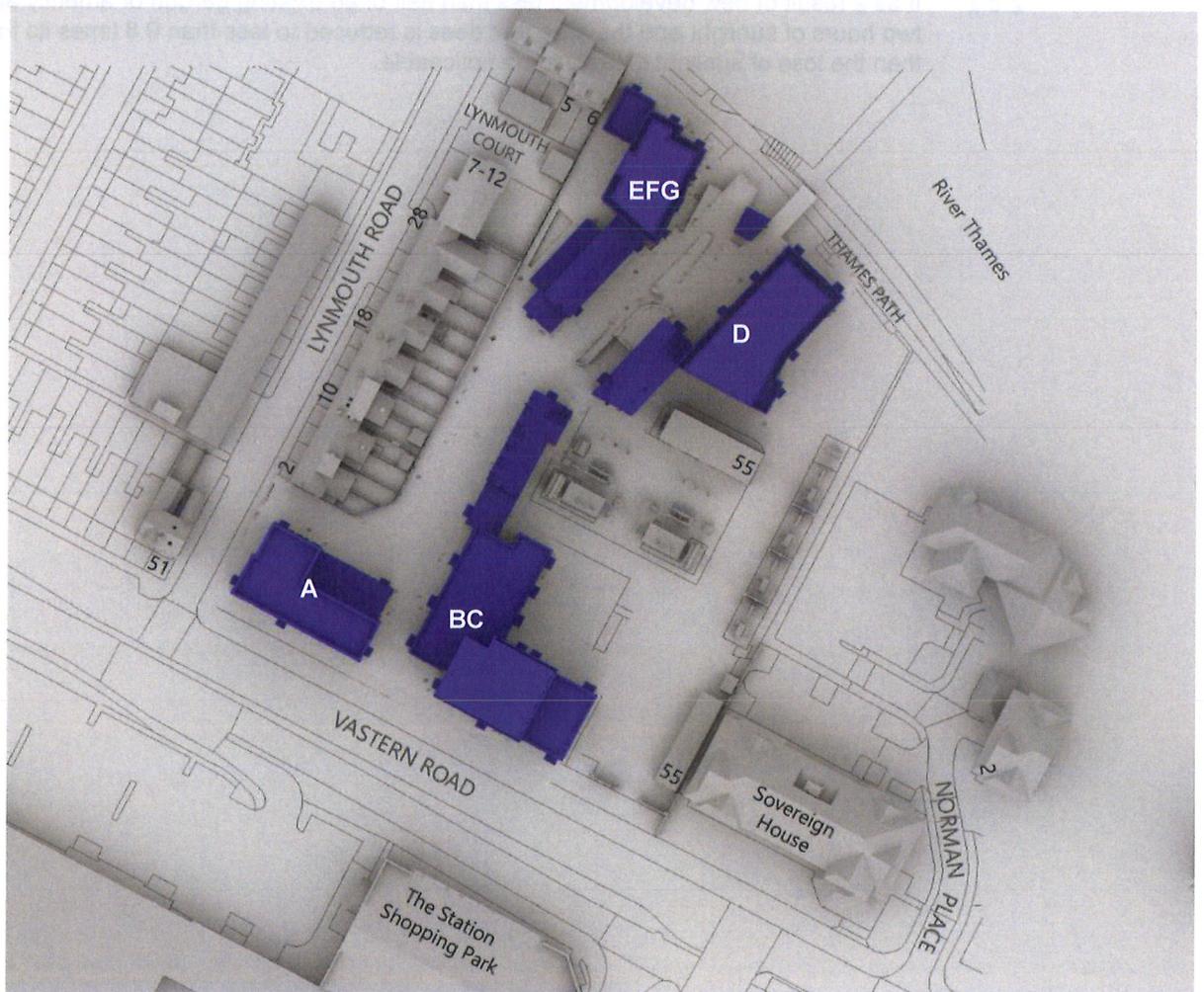


Figure 2 Proposed site layout. Copyright Eb7.

3.1.2 The existing residential properties most likely to be affected by the proposals have been assessed. Other nearby residential locations would be less affected.



3.2 2-26 Lynmouth Road

3.2.1 Loss of daylight

- 3.2.2 Numbers 2-26 Lynmouth Road lie to the west of the proposed development. Numbers 2 to 8 face the existing low rise building at the south end of the site. The higher numbers currently face a car park and therefore have limited levels of external obstruction. Unless the windows are obstructed by existing rear additions or overhangs, they generally have high VSCs.
- 3.2.3 According to Valuation Office Agency records, numbers 2 to 20 Lynmouth Road are single households. Numbers 22 to 26 have two properties at each address. These may have different interior layouts to numbers 2 to 20.
- 3.2.4 Over the terrace as a whole, 42 windows would have a loss of VSC characterised as minor adverse. Some of these are secondary windows, and some of the losses would be only marginally outside the guidelines, either retaining just below 27(%) of VSC or losing only just over 20% of the amount they currently receive. The windows affected are principally on the end of the rear additions, with some on the main rear elevations. Individual properties with larger losses are discussed in more detail below.
- 3.2.5 Changes in daylight distribution would be within the guidelines for most of the rooms in the terrace. Other rooms are discussed individually below.
- 3.2.6 Four ground floor windows of number 2 are particularly badly affected due to an overhang. There would be a major adverse impact on these windows, but largely as a result of its own design, which limits the amount of daylight these windows can receive from the higher part of the sky. In this type of circumstance, the BRE Report suggests that the calculation might be repeated with the overhang removed to see if the overhang is the main contributor to the loss. This has not been carried out, but the losses would be likely to be substantially lower without the overhang in place. Three of the rooms would also have a large change to their daylight distribution. We would agree with Eb7's comment that the reductions are actually small, but represent a large proportion of the daylight currently received because the existing levels are so low. The rooms are likely to already be dependent upon electric light.
- 3.2.7 The windows maps show two W1 window references at number 6. It is not clear which window is actually window 1, but it does not make a great deal of difference which window position it is as the losses for number 6 are similar to those for the rest of the terrace. There is also a second floor reference at the same address but no second floor windows are present on the window map.
- 3.2.8 Number 24 is more affected than other properties in the north end of the terrace. One of its ground floor windows would have a moderate loss of VSC and another a major loss. Two of the rooms would also have a moderate and major change to their daylight distribution respectively. Eb7 note that the windows are beneath an overhanging awning, which would limit the amount of daylight which can be received from the higher part of the sky. As with number 2, this could have been repeated without the contribution of the awning to check whether it is the main reason for the loss being outside the guidelines. However, given the results for the other houses on the terrace, it is likely that the losses without the awning taken into account would be similar to those for the neighbouring properties and minor adverse in scale.
- 3.2.9 Number 26 has one ground floor daylight distribution result outside the guidance which would be minor adverse and similar in size to the losses to the windows.