

STATEMENT BY READING BOROUGH COUNCIL ON ADEQUACY OF THE ENVIRONMENTAL STATEMENT
WITH RESPECT TO DAYLIGHT AND SUNLIGHT

20 June 2022

1. This note sets out the views of the local authority on the adequacy of the Environmental Statement with respect to daylight and sunlight. It does not address other issues in the Environmental Statement.
2. An Environmental Statement would normally be expected to address potential impacts on sensitive receptors surrounding the proposal site. For daylight and sunlight this would include residential buildings, open spaces, and other buildings with a particular requirement for daylight and sunlight. Both existing and future proposed receptors are normally addressed; future proposed receptors are often dealt with as part of a more general cumulative assessment within the Environmental Statement.
3. The Environmental Statement addressed loss of light to existing dwellings at 17-49 Vastern Road and 87-97 Caversham Road. However, it did not include material on the loss of light to the proposed mixed-use developments at 80 Caversham Road and 55 Vastern Road (these developments have since received planning consent). It also did not include material on loss of light to the existing dwellings at 51 Vastern Road. The daylight distribution data for other existing properties was presented in an unusual way which made it impossible to assess whether rooms met the BRE guidelines, and there were some mistakes in the tables for 87-97 Caversham Road which made it appear as if the daylight distribution guidelines had been met, when they had not.
4. Since then, the Appellants have provided adequate data on the daylight distributions to existing properties, loss of light data for 51 Vastern Road and loss of light data for 55 Vastern Road. These are in the revised SoCG on daylight and sunlight.
5. In the Council's expert's opinion, data on the loss of light to the proposed developments at 80 Caversham Road are still incomplete. For 80 Caversham Road data have been provided in the form of coloured diagrams which are difficult to interpret. These data do now cover the blocks affected, and the Appellant has provided keys showing the proportions of each façade that would have particular vertical sky components. These show a proportion of the facades with low VSCs, and this proportion increases in the proposed scenario, but the shading on the diagrams is indistinct and it is not possible to tell the effect on the expected window positions in 80 Caversham Road, illustrative drawings for which are now available. This contrasts with the (post Environmental Statement) situation for 55 Vastern Road, where the Appellant has provided clear numerical data on loss of light. Although 80 Caversham Road is an outline scheme, clear numerical data, for example vertical sky components on the facades, can and should be provided for it.
6. The data show that there would be significant impacts on daylight to 51 Vastern Road, on daylight and sunlight to 55 Vastern Road, and on daylight to 80 Caversham Road. Loss of light to these receptors should therefore have been considered in the original Environmental Statement. In the Council's view this confirms that the EIS/ES is not adequate in its coverage.
7. For this reason, may we respectfully request that the Inspector makes a Direction requiring further information and evidence in relation to the Environmental Statement, pursuant to Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, assessing cumulative daylight/ sunlight impacts on the aforementioned

sites, and impacts to 51 Vastern Road, to be provided for the purpose of determining this appeal.

8. Some of this information has already been provided for the purposes of the Inquiry in the Appellant's Position Statement and the council's expert's proofs of evidence, and in the joint Statement of Common Ground on daylight and sunlight. This, together with further numerical data on the loss of daylight to 80 Caversham Road, is required in order that the Inquiry may properly address the impacts of the proposed development on daylight and sunlight to surrounding receptors.