

16th September, 2022

Vastern Court, Reading

Response to Inspector's Note of 27.2.22

80 Caversham Road

To demonstrate that the proposed accommodation within the development for 80 Caversham Road can achieve appropriate levels of daylight, an analysis of agreed sample rooms on the lowest floors of residential accommodation, as indicated on drawing numbers 2271-206 and 207 has been undertaken. The results of the analysis as set out in the attached tables, demonstrate that both for the Parameter Massing (Cumulative) and Illustrative Residential Scheme, the minimum standard for average daylight factor is achieved. It is therefore agreed that it would be possible to design proposed accommodation on the 80 Caversham Road site with adequate levels of daylight with the implementation of either the Parameter Massing or the Illustrative Residential Scheme.

55 Vastern Road

Following a further review of this, CHP believe that the cumulative analysis undertaken by Eb7 did not include the balconies over the windows of 55 Vastern Road and this was set out in CHP's letter of the 19th July 2022.

Dr Littlefair on the 5th August agreed that the Eb7 data should not be used, as it is invalid, and if BRE had known this at the time they would have advised RBC to ignore it.

It is therefore agreed that the figures set out in the table attached to the SOCG dated 10th June 2022 title 55 Vastern Road Cumulative ADF (page41) are correct, although the column titled "Eb7 Results from 20/05/2020" should be ignored.



The CHP Cumulative results do show the level of daylight that 55 Vastern Road will enjoy, with the correct Parameter Massing and including the balconies. As was accepted at the time of the 55 Vastern Road appeal, of the 12 Living/Kitchen/Diners (L/K/D) analysed, the majority will not achieve the ADF target, but that all bedrooms would.

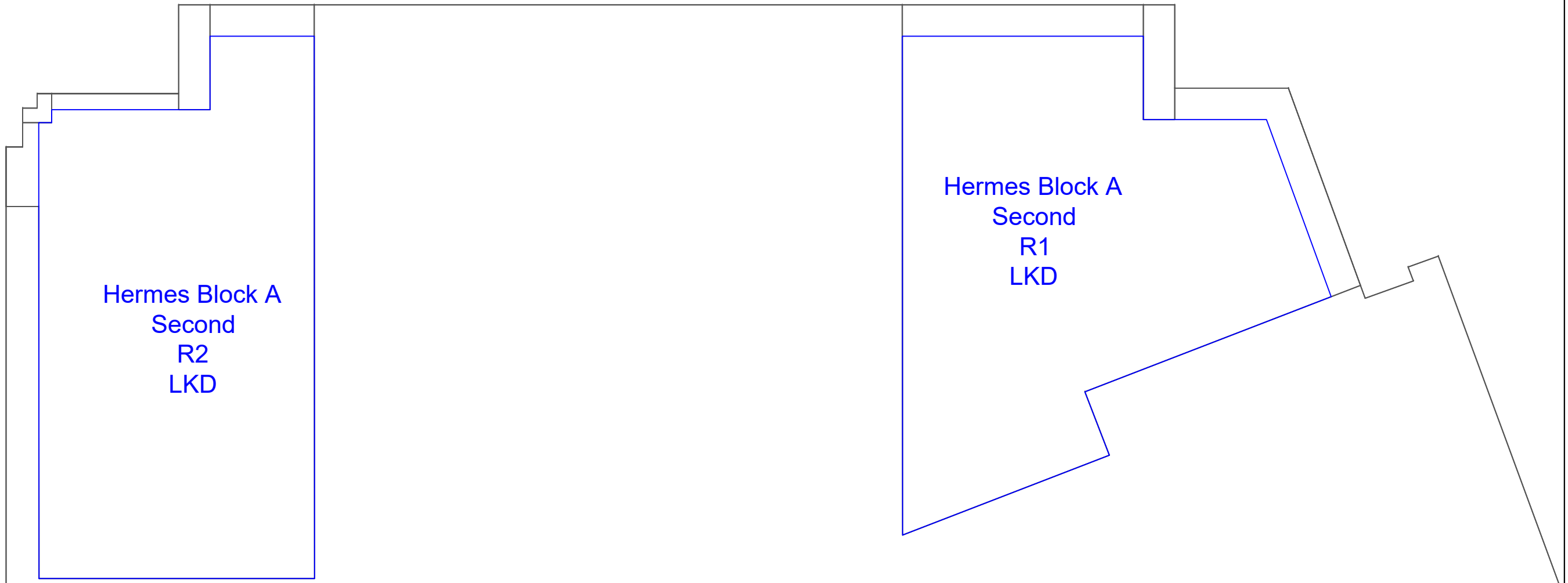
A further analysis has been undertaken for the Illustrative Residential Scheme and these are attached and demonstrates that there is an improvement in the level of daylight that will be enjoyed in this instance, compared with the Cumulative Analysis.

This, CHP considers, demonstrates that the Parameter Massing (Cumulative) and Illustrative Residential Scheme to a greater extent, will ensure that the proposed habitable rooms within 55 Vastern Road will have access to what is, and was considered as part of the 55 Vastern Road appeal, an appropriate level of daylight.

Dr Littlefair however maintains that the Council has at no stage sanctioned the massing for Vastern Court considered by Eb7 and has consistently wanted a reduced massing on the site. He also disagrees with using the Illustrative Residential Scheme as a yard stick, because there would be nothing to stop a scheme being built whose heights on the Vastern Road frontage were in line with the maximum parameters. He notes that even with the Illustrative Residential Scheme data eleven out of the twelve living rooms analysed would have average daylight factors below the minimum standard of 1.5%, which cannot be considered an appropriate level of daylight.

BRE guidelines 2022

Attached is the agreed statement with regards to this.



KEY

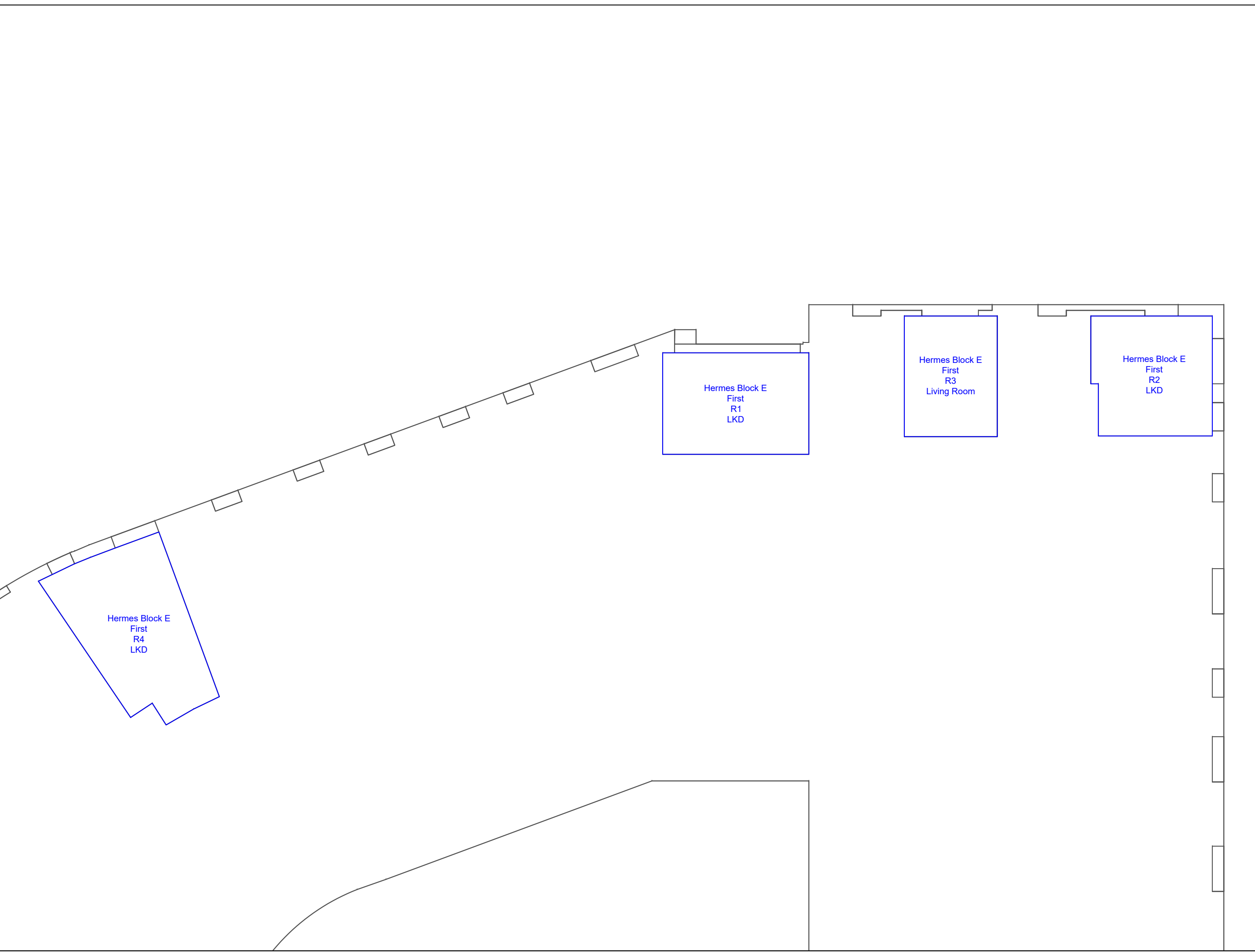


PROJECT TITLE
Reading Station

DRAWING TITLE
Hermes Block A - Second Floor
ADF results

SCALE	DATE	ISSUE
NTS	19-07-2022	-

DWG NO	REV
2271_206	-



KEY

LEVEL	ROOM	ROOM USE	REQUIRED ADF	PROPOSED ADF
<u>Hermes Block A</u>				
Second	R1	Living/Kitchen/Diner	1.5%	5.1%
Second	R2	Living/Kitchen/Diner	1.5%	3.2%
	R1			
<u>Hermes Block E</u>				
First	R1	Living/Kitchen/Diner	1.5%	3.2%
First	R2	Living/Kitchen/Diner	1.5%	2.0%
First	R3	Living Room	1.5%	1.7%
First	R4	Living/Kitchen/Diner	1.5%	2.1%

LEVEL	ROOM	ROOM USE	REQUIRED ADF	PROPOSED ADF
<u>Hermes Block A</u>				
Second	R1	Living/Kitchen/Diner	1.5%	6.8%
Second	R2	Living/Kitchen/Diner	1.5%	3.5%
<u>Hermes Block E</u>				
First	R1	Living/Kitchen/Diner	1.5%	3.7%
First	R2	Living/Kitchen/Diner	1.5%	2.2%
First	R3	Living Room	1.5%	1.9%
First	R4	Living/Kitchen/Diner	1.5%	2.3%

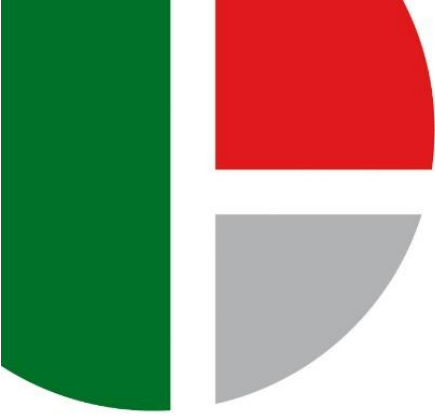


55 Vastern Road

Cumulative v IRS ADF

16/09/2022

Location	Room	Room Use	CHP Cumulative Results (25/04/2022)	CHP Illustrative Residential Scheme
A-G1	A-05	LKD	1.3	1.4
	A-06	Bedroom	2.2	2.5
	A-07	Bedroom	1.5	1.8
	A-08	LKD	0.4	0.5
	A-09	Bedroom	1.9	2.3
	A-10	Bedroom	1.5	1.8
	A-11	Bedroom	1.5	1.9
	A-12	Bedroom	1.9	2.4
	A-13	LKD	0.8	1.0
A15	A-21	LKD	1.5	1.6
	A-22	Bedroom	2.3	2.6
	A-23	Bedroom	1.6	1.9
	A-24	LKD	0.6	0.7
	A-25	Bedroom	1.9	2.4
	A-26	Bedroom	1.5	1.9
	A-27	Bedroom	1.5	2.0
	A-28	Bedroom	1.9	2.5
BC-G1	A-29	LKD	1.0	1.1
	BC-10	LKD	0.9	1.1
	BC-11	Bedroom	1.5	1.8
	BC-12	Bedroom	1.1	1.4
	BC-13	LKD	0.4	0.5
	BC-14	Bedroom	1.5	1.7
	BC-15	Bedroom	1.2	1.4
	BC-16	Bedroom	1.0	1.1
BC-1 st	BC-17	Bedroom	1.1	1.2
	BC-18	LKD	1.2	1.2
	BC-36	LKD	1.0	1.2
	BC-37	Bedroom	1.5	1.2
	BC-38	Bedroom	1.2	1.8
	BC-39	LKD	0.5	0.6
	BC-40	Bedroom	1.5	1.8
	BC-41	Bedroom	1.3	1.5
BC-42	Bedroom	1.0	1.1	
BC-43	Bedroom	1.1	1.2	
BC-44	LKD	1.4	1.4	



Our Ref: 2271-22-0715-Littlefair

19th July 2022

P Littlefair Esq
BRE
Garston
Watford
WD25 9XX

Dear Paul,

Vastern Court, Reading

As agreed, we have calculated the ADF the habitable rooms within the agreed units of 80 Caversham Road on the lowest floor of residential accommodation, overlooking the Parameter Massing and Illustrative Residential Scheme for Vastern Court.

As you will appreciate, the illustrative scheme for 80 Caversham Road only include internal configuration for one of the flats being considered, which upon review we did not consider was reasonable, indicating the living room is smaller than the bedroom. We have therefore assumed in all instances the internal configuration for the flats being considered and these are indicated on drawing numbers 2271-206 & 207 attached.

The results of the analysis are set out in the attached tables and demonstrate that in all instances it will be possible to design a scheme for 80 Caversham Road whose accommodation overlooking Vastern Court will have an appropriate access to daylight.

With regards to the key associated with the façade analysis on drawing number 2271-143B and 150B we would confirm that this did not include the roof areas.

Finally, in relation to 55 Vastern Road and the analysis undertaken, in accordance with the same criteria as it appeared EB7 used (eg. with the balconies to 55 Vastern Road omitted), we have reviewed these and note that in certain instances the reflectance values between analysis reverted to previous values. We have therefore re-run all the analysis and attach a revised table. This demonstrates that in relation to the Illustrative Residential Scheme, all rooms will achieve or exceed the ADF considered appropriate as part of the application for 55 Vastern Road. With regards to the Parameter Massing, the analysis demonstrates that all bedrooms will exceed the recommended ADF and of the 12 LKD's ten will achieve an ADF of at least 1.5% or the level considered appropriate as part of the 55 Vastern Road application.



Concerning the other two, these will achieve an ADF within 0.1% of the ADF considered appropriate as part of the 55 Vastern Road application. The analysis therefore demonstrates that the proposed accommodation will retain a level of daylight considered appropriate as part of the 55 Vastern Road application.

I look forward to receiving confirmation you have no comments on the above.

Yours sincerely,



James M A Crowley
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Encl.

Vastern Court, Reading, RG1 8AL

TOWN AND COUNTRY PLANNING ACT 1990 APPEAL UNDER SECTION 78
APPEAL BY AVIVA LIFE & PENSIONS UK Ltd AGAINST THE FAILURE OF READING
BOROUGH COUNCIL TO DETERMINE WITHIN THE PRESCRIBED PERIOD A PLANNING
APPLICATION

Statement of Common Ground: Daylight standards

Between

James Crowley, CHP Surveyors, on behalf of Aviva Life & Pensions UK Ltd
and Dr Paul Littlefair, BRE, on behalf of Reading Borough Council

INSPECTORATE REFERENCE: APP/E0345/W/21/3289748
READING BOROUGH COUNCIL REFERENCE: 200328

September 2022

Dr Paul Littlefair, BRE, Garston, Watford WD25 9XX
James Crowley, CHP Surveyors Ltd, 2-6 Boundary Row, LONDON SE1 8HP

- 1.1 The assessment of daylight and sunlight by the appellant's and council's expert witnesses has been based on the guidance in the second (2011) edition of 'Site layout planning for daylight and sunlight: a guide to good practice'. For daylight and sunlight provision in proposed buildings, this drew on the guidance in the British Standard Code of Practice for daylight, BS 8206 Part 2, including its recommendations on average daylight factors and annual probable sunlight hours in interiors. In 2019, BS 8206 Part 2 was superseded by BS EN 17037:2018. BS EN 17037 contains new recommendations on daylight provision in interiors, based on median illuminance and median daylight factor, and on sunlight provision based on hours of sunlight received on a specific date.
- 1.2 'Site layout planning for daylight and sunlight: a guide to good practice' was updated in June 2022, after the inquiry began. For daylight and sunlight provision in proposed buildings, the recommendations in the new 3rd edition are based on those in BS EN 17037. For loss of light to existing buildings, the recommendations are similar to those in the previous edition, being based on the vertical sky component, area of visible sky (no sky line) and annual probable sunlight hours as before.
- 1.3 During the period 2019-June 2022, when BS EN 17037 was available but 'Site layout planning for daylight and sunlight: a guide to good practice' had not been updated, it was established practice for consultants to use either the approaches in BS EN 17037 or those in BS 8206 Part 2/'Site layout planning for daylight and sunlight: a guide to good practice'. Most consultants retained the approach recommended in the 2nd edition of 'Site layout planning for daylight and sunlight: a guide to good practice' (based on BS 8206 Part 2) as that was viewed as the primary guidance document.
- 1.4 In his evidence, the appellant's expert has primarily used the recommendations in the 2nd edition of 'Site layout planning for daylight and sunlight: a guide to good practice' (based on BS 8206 Part 2). He has also provided some tables of daylight provision, using one of the methods in BS EN 17037. We agree that this is a reasonable approach given that this was the current BRE guidance at the time the inquiry commenced. Requiring the appellant to provide a complete set of new data based on the 3rd edition of 'Site layout planning for daylight and sunlight: a guide to good practice' and BS EN 17037 would require a substantial amount of extra work for both

parties and require an additional session to present and debate this evidence. This would be onerous and not worthwhile given that the minimum daylight recommendations in the UK National Annex of BS EN 17037 are intended to result in similar levels of compliance to those in BS 8206 Part 2.

1.5 The above matters have been agreed by RBC and the Appellant.

Signed and dated by Dr Paul Littlefair of BRE on behalf of Reading Borough Council

Paul Littlefair

Date 16 September 2022

Signed and dated by James Crowley of CHP Surveyors on behalf of the Appellant

James Crowley

Date 16 September 2022