

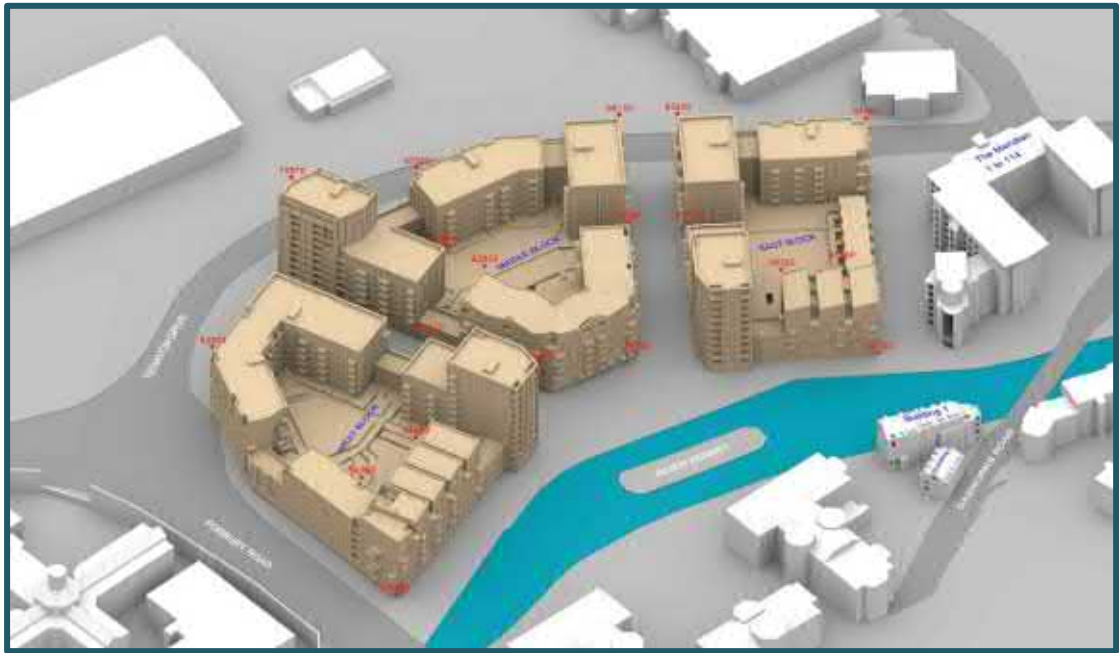
- 3.4 It is important to remember that the BRE Guidelines states that *'the advice given here is not mandatory and should not be seen as an instrument of planning policy'*. Furthermore, daylight criteria should be *'interpreted flexibly because natural lighting is only one of many factors'*. Based upon these statements it is important to apply the guidance and target levels sensibly and flexibly taking into account the context of the site.
- 3.5 BRE Guidance does not give any specific criteria in relation to Living/Kitchen/Dining (LKD) Rooms. The 2008 edition of British Standard notes that in a space which combines a living room and a kitchen the average daylight factor should be 2%. In our view, achieving an ADF of 2% within a LKD is an unrealistic benchmark within dense urban schemes, especially when the Kitchen is positioned at the rear of the room where access to direct skylight will be limited. It is therefore considered that a target ADF of 1.5% within an LKD is acceptable within for a scheme of this density as this is appropriate for a primary living area.

4 Sources of Information

Site Photographs	- Point 2 Surveyors
Survey	- Topographical Survey 25/05/16 0839-005 003 Existing Site Layout and Topographical Survey - Reading 130711 kr.dwg
PRP Architecture	- Proposed 2D Drawings 13/03/19 190311 S73 Proposed 3D Model 29/03/19 AA5990 Kenavon Site Model DWG.dwg Proposed Plans & Elevations 09/05/19 AA5990-2180_East Block_F.dwg AA5990-2181_East Block_E.dwg AA5990-2182_East Block_C.dwg



5 The Proposed Scheme



Drawing Reference: P915/41 – 3D View – Proposed Scheme

- 5.1 Our understanding of the proposed scheme is illustrated in drawings P915/40-42 and can be located within Appendix A.

6 Internal Daylight Study

6.1 The results of our internal daylighting study to the proposed rooms, including drawings showing the layouts, window positions and orientation of the units can be found appended to this report under drawing references P915/I/230-237, 245, 246 and 247 (Appendix B). For ease of reference, we have also appended the results for the consented units as presented in our Internal Daylight Report dated April 2017 (Appendix D).

6.2 For the purposes of this study we have considered the amenity levels to all 92 of the new, proposed habitable rooms.

West Block

6.3 There are 4 proposed habitable rooms within this block located at ground and first floors, namely; 2 Living/Kitchen/Dining Rooms (LKDs) and 2 Bedrooms.

6.4 All 4 rooms meet and surpass the desired ADF target value for their observed usage.

Middle Block

6.5 There are 37 proposed habitable rooms within this block located at ground to sixth floors, namely; 26 LKDs and 11 Bedrooms.

6.6 30 of the rooms meet and surpass the desired ADF target value for their observed usage.

6.7 6 LKDs not meeting the target value (R2/200, R4/200, R6/200, R3/201, R5/201 and R7/201) achieve 0.9% to 1.1% ADF. These results are similar to the LKDs that were consented previously, which achieved 1.1% to 1.2%. The results are directly comparable to similarly laid out, consented LKDs located on the floor above (R1/222, R2/222, R19/222, R2/222, R4/212, R6/212, R6/202 and R8/212 – as illustrated on our drawing number P915/I/153&154). These levels of ADF are not unusual in dense urban schemes. Moreover, it should also be noted that balconies above these windows influences the lower values.

6.8 The one bedroom (R6/201) achieves an ADF of 0.7%, which is identical to what was achieved in the consented scheme.

East Block

6.9 There are 51 proposed habitable rooms within this block located at ground to second floors, namely; 17 LKDs, 4 Studios and 30 Bedrooms.

6.10 37 of the rooms meet and surpass the desired ADF target value for their observed usage. We draw particular attention to the bedrooms beneath the walkway on the rear of the Mews block, which achieve 1.4% to 1.8% ADF, thus performing very well against the 1% ADF target.

- 6.11 Of the remaining 14 rooms, 6 LKDs are located at ground floor within the Mews block (R1, 2, 3, 4, 5, & 6/300) and achieve 1.1% to 1.4% ADF. The consented scheme previously provided for a separate Kitchen/Diner in this location with the Living Room on the floor above. The increase in the size of the room has subsequently reduced the ADF values received. The revised values, whilst they depart from the target value set by British Standard, do still achieve a level of ADF which not uncommon within dense urban schemes and certainly not dissimilar to other consented LKDs within the consented scheme.
- 6.12 There are a further 4 LKDs located at first floor on the north-west elevation which achieve 0.6% to 0.9% ADF. In addition to the presence of external balconies, this is influenced somewhat by a structural cross-bar above the window head, which acts as an obstruction to direct skylight received at the top of the window. It should also be noted that proposed values in this range are found elsewhere in the wider consented scheme.
- 6.13 There are 2 Studios proposed at ground floor level (R19/300 and R20/300), directly below the abovementioned LKDs which achieve 1.2% and 1.3% ADF, which depart from the desired target value, but comparable to consented units elsewhere in the scheme. Again, these lower levels are influenced by balcony provision.
- 6.14 Finally, there are 2 bedrooms at first floor level (R26/301 & R28/301) that achieve 0.7% and 0.5% ADF, which depart from the desired 1% target. These values are however comparable to consented elsewhere in the scheme and, again, somewhat influenced by balcony provision.

Summary of All Proposed Rooms

- 6.15 The ADF analysis demonstrates that the majority of proposed units achieve high levels of daylight, surpassing the target values detailed within the British Standard/BRE Guide. Where derogations from the target occur, the results are broadly comparable to those already consented and, furthermore, are influenced by the presence of balconies at various points. Officers previously considered that the benefits of providing valuable, external amenity spaces outweighed the daylight deficiencies on the wider planning balance and that daylight provision overall was considered adequate for the scheme as a whole. If we combined the all the new proposed habitable rooms together with all of the wider consented rooms, the scheme would still demonstrate that there is, overall, a high level of compliance with the target ADF values set by the British Standards/BRE Guidance.
- 6.16 We consider the overall levels of daylight proposed within this proposed scheme to be adequate and reflect the flexibility intended by the BRE Guidelines in relation to daylight amenity within dense urban areas, where daylight targets are not the same as a low rise suburban environment.

7 Internal Sunlight Study

- 7.1 For the purposes of this assessment we have assessed all proposed Living Rooms, Living Kitchen Dining Rooms and Studios which have at least one window orientated within 90 degrees either side of due south; BRE Guidance stating bedrooms and kitchens are less important (BRE para 3.1.2).
- 7.2 We have included a colour coded analysis table within Appendix C to this report which identifies the orientation of windows from due south and the rooms' APSH and Winter Sunlight Values. The room and window references correspond with those provided within the ADF layout drawing within Appendix B.
- 7.3 The below table summarises the results:

No. of Rooms achieving 25+% APSH	No. of Rooms achieving 20-24% APSH	No. of Rooms achieving less than 20% APSH
18	7	11
No. of Rooms achieving 5+% Winter Sunlight	No. of Rooms achieving 3-4% Winter Sunlight	No. of Rooms achieving less than 3% Winter Sunlight
28	0	8

- 7.4 There is an overall good level of compliance with regard to sunlight amenity. Where rooms do not achieve 25% APSH with 5% in Winter, they still retain levels of sunlight which are commensurate within dense developments. British Standard states that the absence of sunlight is more acceptable when a building is in a densely-built urban area (see para 5.3 BS8206-2:2008). Overall we consider the level of sunlight received acceptable on planning balance.

8 Conclusion

- 8.1 Section 6 above, and the appended drawings to this report (P915/l/230-237, 245, 246 and 247), show that the scheme demonstrates a good level of compliance with BRE Guidance in terms of internal daylight amenity with the vast majority of the analysed rooms meeting and improving upon ADF target values for their observed usage. Where some departure occurs, this is typically due to the presence of presence of balconies.
- 8.2 External amenity areas are readily sought after by occupants and should be considered as a benefit to the property, not a constraint. The provision of balconies should be weighed against the daylight values within the rooms; which was considered within the consented scheme and on balance considered acceptable given the overall high level of compliance within the proposed rooms and wider Kenavon Drive scheme.
- 8.3 With regard to the level of sunlight amenity, Section 7 and the appended APSH table demonstrates the majority of analysed rooms achieve the target Annual and Winter Sunlight Hours. Given the density of the scheme some obstruction to sunlight is unavoidable but, the retained levels of APSH are considered commensurate within large urban developments.
- 8.4 BRE Guidance is a guide for buildings in all types of locations; from a rural conservation area to a densely populated city centre. Whilst it gives numerical guidelines they need to be interpreted flexibly.
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- 8.5 We support this scheme in terms of internal daylight and sunlight amenity.

