

Aidan Robson  
Danescroft Land Ltd  
40-42 Parker Street  
London WC2B 5PQ

25 July 2019

Dear Aidan

**Re: (ROL00143 Reading Gasworks)**

Further to our discussions, we have completed a review of BRE's report and responded to the various points below. We have also completed the sun-on-ground analysis for the proposed amenity areas within the gas holder development site and also a sunlight analysis of the neighbouring gardens at 19 and 21 Alexander Turner Close, and 51 and 53 Robert Parker Road.

**Comments on BRE's review**

As mentioned above, the neighbouring properties at Alexander Turner Close and Robert Parker Road have been taken into consideration for sun on ground analysis and this is explained further below.

Taking BRE's point about reflectance, these reflectance values are explained in our report and are commonly used for new build residential developments where lighter finishes are specified. We cannot account for any changes potential occupiers will make to the decoration of the apartments post purchase. Additionally, it is not specified by the current guidelines, nor practical to take into consideration the furniture reflectance within apartments, again because we cannot predict the occupier's choice of furniture style, layout and colour. The approach to reflectance values and furniture is commonly accepted by councils nationally and within our industry.

With regard to the window maintenance factor, this is a factor of 0.92. The formatting of the table key appears to have erroneously rounded up 0.92 to 1. This does not impact the analysis that has been undertaken.

In terms of the window reflectance, until recently the MBS software we use does not apply a reflectance value specific to the window and therefore a value of 0.81 for pale cream walls will have

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*applied*

been used. The MBS software has recently introduced this update, but this analysis was undertaken prior to this update using the previous software version. We understand there would be a reduction in the reflectance value for the area occupied by the window and this would result in a minor reduction in the light levels recorded. The light levels recorded are good, as recognised by BRE, and therefore we think it is unlikely that this change in the software calculation will have a material impact on the adhere levels recorded.

When truncating rooms, this is again a standard approach accepted throughout our industry and by council's nationwide. The BRE guide at paragraph 2.1.14 states that where kitchens are located to the rear of a multi-use space, they should be linked to a well daylight living room. This therefore alludes to the practice of notional truncation to allow for the testing of the adjoining main living space. For us to test the living space, a notional wall is placed in the model in order for our software to register an enclosed space, and the same reflectance value is then applied to all walls. This is a hypothetical scenario and therefore it is reasonable to apply a reflectance value to the wall to calculate the daylight value for this living space as if it were a single use living room. This approach again is accepted as a standard approach within our industry and is used by the vast majority of daylight and sunlight practitioners. Additionally, the approach of truncating kitchens has been reviewed by BRE in past Anstey Horne reports on other developments, and this has not previously been highlighted as a problem. Nonetheless, almost all rooms tested not only adhere to the guidelines but far exceed them meaning that the daylight levels in the proposed development are very good, as noted by BRE. Even if one were to test without truncating the kitchens, it is likely that these rooms would remain adherent to the guidelines.

With regard to our truncation of some bedrooms, paragraph 2.2.2 notes that circulation spaces need not be analysed, so often where bedrooms have corridors leading away from the main room to the bedroom door, these will be notionally truncated. Even with these areas included in the analysis, the results for daylight are good and it is very unlikely that the addition of these circulation spaces will lead to reductions in the daylight adherence levels.

### Sun on Ground Methodology

Section 3.3 of the BRE guidelines makes recommendations concerning the impact of proposed development on sunlight to open spaces between buildings, such as main back gardens of houses, allotments, parks and playing fields, children's playgrounds, outdoor swimming pools, sitting-out areas, such as in public squares and focal points for views, such as a group of monuments or fountains. We have assessed the gardens to 19 and 21 Alexander Turner Close, and 51 and 53 Robert Parker Road and also the proposed communal amenity spaces for the use and enjoyment of future residents.

The guide recommends that the level of overshadowing on such areas should be checked on the equinox (21 March). The BRE Report recognises that each of these spaces has different sunlight requirements and that it is difficult to suggest a hard and fast rule. However, it recommends that at least half of the amenity area should receive at least two hours of sunlight on the equinox on 21 March. For neighbouring amenity spaces, if the area does not receive sunlight to 50% of the amenity space in the proposed scenario after the development is in place, then one looks at the percentage loss from the existing to the proposed condition. We use the 0.8 BRE guideline, whereby a reduction of more than 20% is likely to be noticeable.

Sunlight at an altitude of 10° or less does not count, because it is likely to be blocked by planting anyway. Driveways and hard standing for cars is usually left out of the area calculation. Fences or walls less than 1.5 metres high can be ignored. The guide also notes that:

*“normally, trees and shrubs need not be included, partly because their shapes are almost impossible to predict, and partly because the dappled shade of a tree is more pleasant than a deep shadow of a building”.*

This is especially the case for deciduous trees, which provide welcome shade in the summer whilst allowing sunlight to penetrate during the winter months. This is the basis on which our analysis has been undertaken.

## Results

We have calculated the effect on the gardens at 19 and 21 Alexander Turner Close, and 51 and 53 Robert Parker Road by plotting the two-hour sun contour on 21 March in the existing and proposed condition as shown on our drawings appended to this report (ROL00143\_R03\_V01\_302-01 and 02). The analysis of the proposed amenity spaces is also appended to this report (ROL00143\_R03\_V01\_301-01). The parts of each amenity space receiving at least two hours of sunlight are shaded yellow and expressed as a percentage on the drawings.

We have tested the two proposed amenity areas and have referenced these on the attached plan as A1 and A2. As noted above, the guideline target is for 50% of the amenity space to receive more than two hours of direct sunlight on the 21 March. Both these large proposed amenity areas receive far in excess of the 50% guideline, with both achieving the target sunlight hours to 100% of the areas analysed.

For the neighbouring properties, the figures are also set out in the table below, along with the factor by which the existing sunlit area will change as a consequence of the proposed development.

| Address                   | Proportion in sun for $\geq 2$ hrs on 21 March |          | Factor of former value |
|---------------------------|------------------------------------------------|----------|------------------------|
|                           | Existing                                       | Proposed |                        |
| 19 Alexander Turner Close | 27%                                            | 26%      | 0.99                   |
| 21 Alexander Turner Close | 37%                                            | 25%      | 0.66                   |
| 51 Robert Parker Road     | 71%                                            | 65%      | 0.91                   |
| 53 Robert Parker Road     | 83%                                            | 79%      | 0.95                   |

The gardens at 51 and 53 Robert Parker Road receive over 50% in both the existing and proposed scenario and therefore remain BRE adherent.

For 19 Alexander Turner Close, the sunlight levels are below the 50% guideline in the existing and proposed condition, but the reduction is minor at 1% so again the space remains BRE adherent.

For 21 Alexander Turner Close, the sun lit area is 37% in the existing condition and 25% in the proposed condition, which represents a 34% reduction. This reduction therefore sits outside of the 20% reduction advised by the BRE guideline. However, as noted in previous reports and by BRE, we have tested the gas holder in the existing condition as collapsed. This therefore presents a worst-case scenario because a low obstruction in the existing condition allows more sunlight to reach the garden in the existing condition. We are then comparing this to the sunlight obstruction caused by proposed development massing. If we were to show the gas holder to be full or even half full, there would be a larger obstruction in the existing condition and therefore less sunlight reaching the garden. This would mean there would be less of a reduction recorded between existing and proposed conditions. Nonetheless, for 21 Alexander Turner Close the rear part of the garden is the main part of the garden that receives over 2 hours of sunlight in the existing condition and in the proposed condition this area of sunlight is retained.

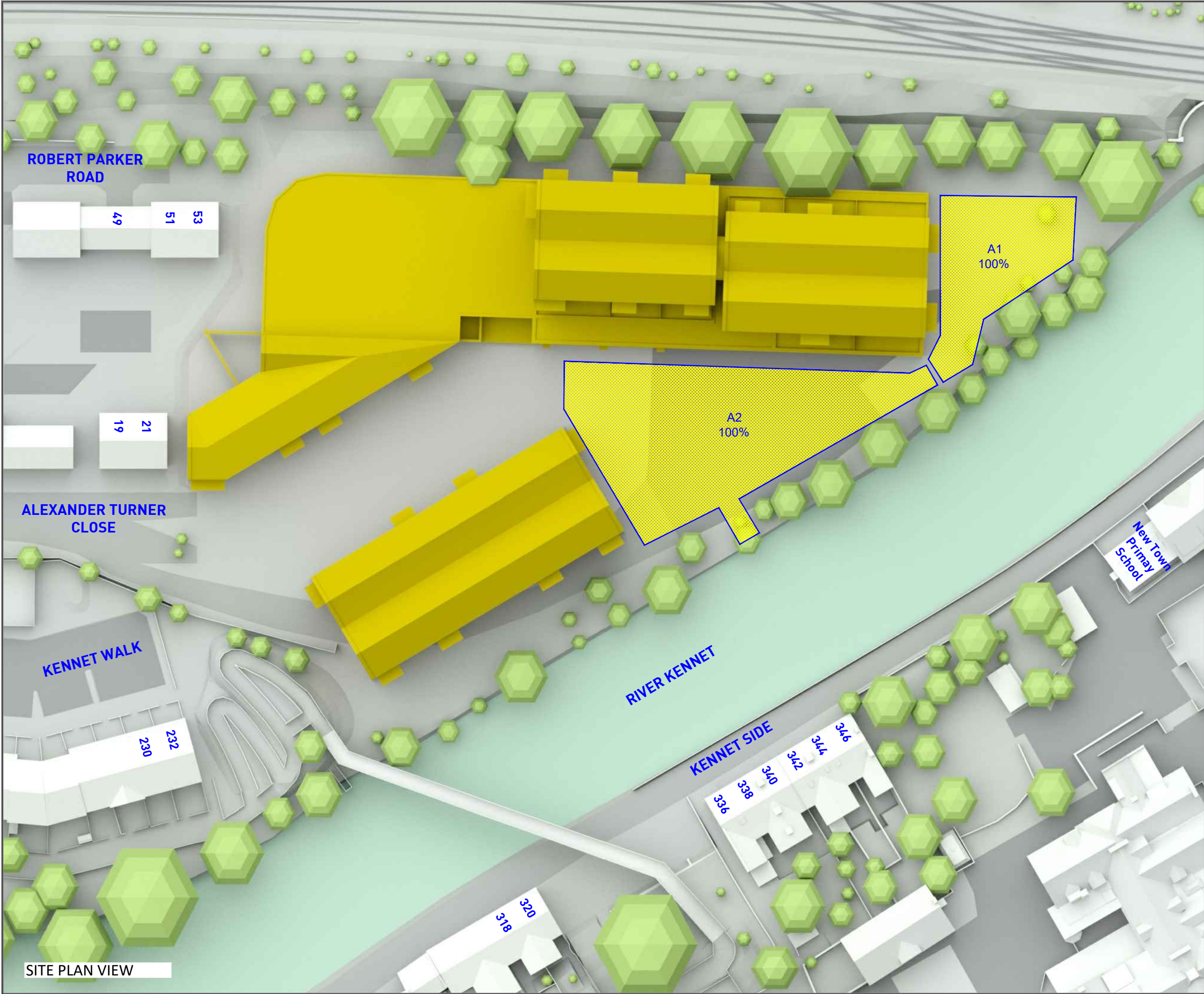
Please let us know if you have any questions or further point for discussion.

Yours sincerely



Rebecca Chapman

Encl.



SITE PLAN VIEW

- LEGEND:
- Area receiving  $\geq$  2hr Sunlight on 21st March (PROPOSED)
  - Area receiving  $<$  2hr Sunlight on 21st March
  - X% - Percentage of Amenity Space receiving  $\geq$  2hr Sunlight on 21st March

SOURCES OF INFORMATION:

**EXISTING, SURROUNDING & ANALYSED BUILDINGS**  
COLLADO COLLINS ARCHITECTS  
Received on 13/03/19

Site and aerial photos.

**PROPOSED BUILDINGS**  
COLLADO COLLINS ARCHITECTS  
Received on 01/04/19



0m 5m 10m 15m 20m 25m

| REV                                                                                                                                                                                                                | DESCRIPTION | DATE |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|------|
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|                |                                                   |
|----------------|---------------------------------------------------|
| CLIENT:        | DANESCROFT (KENAVON DRIVE PROJECT MANAGEMENT) LLP |
| PROJECT TITLE: | GAS HOLDER SITE AT ALEXANDER TURNER CLOSE READING |
| SCHEME REF:    | SCHEME RECEIVED: 01/04/19                         |
| DRAWING TITLE: | TWO-HOUR SUNLIGHT TEST PROPOSED CONDITION         |

|                    |                 |                |              |    |
|--------------------|-----------------|----------------|--------------|----|
| MODELLED BY: BS/MZ | DRAWN BY: BS/MZ | DATE: 15/04/19 | SCALE: 1:500 | A3 |
|--------------------|-----------------|----------------|--------------|----|

|                  |             |             |             |
|------------------|-------------|-------------|-------------|
| PROJECT No:      | RELEASE No: | VERSION No: | DRAWING No: |
| ROL00143_R03_V01 |             |             | 301-01      |

2Hr Sun-On-Ground

ROBERT PARKER ROAD

ALEXANDER TURNER CLOSE

51

53

A1  
71%

A1  
83%

A1  
27%

A1  
37%

19

21

LEGEND:

- Area receiving  $\geq$  2hr Sunlight on 21st March (PROPOSED)
- Area receiving  $<$  2hr Sunlight on 21st March
- X% - Percentage of Amenity Space receiving  $\geq$  2hr Sunlight on 21st March

SOURCES OF INFORMATION:

EXISTING, SURROUNDING & ANALYSED BUILDINGS  
COLLADO COLLINS ARCHITECTS  
Received on 13/03/19  
Site and aerial photos.  
PROPOSED BUILDINGS  
COLLADO COLLINS ARCHITECTS  
Received on 01/04/19



0m 2m 4m 6m 8m 10m

| REV | DESCRIPTION | DATE |
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CLIENT: DANESCROFT (KENAVON DRIVE PROJECT MANAGEMENT) LLP

PROJECT TITLE: GAS HOLDER SITE AT ALEXANDER TURNER CLOSE READING

SCHEME REF: SCHEME RECEIVED: 01/04/19

DRAWING TITLE: TWO-HOUR SUNLIGHT TEST EXISTING CONDITION

MODELLED BY: / DRAWN BY: BS/MZ DATE: 22/07/19 SCALE: 1:200 A3

PROJECT No: RELEASE No: VERSION No: DRAWING No:  
ROL00143\_R03\_V01\_302-01

2Hr Sun-On-Ground

ROBERT PARKER ROAD

ALEXANDER TURNER CLOSE

51

53

A1  
65%

A1  
79%

A1  
26%

A1  
25%

19

21

LEGEND:

- Area receiving  $\geq$  2hr Sunlight on 21st March (PROPOSED)
- Area receiving < 2hr Sunlight on 21st March
- X%

- Percentage of Amenity Space receiving  $\geq$  2hr Sunlight on 21st March

SOURCES OF INFORMATION:

**EXISTING, SURROUNDING & ANALYSED BUILDINGS**  
COLLADO COLLINS ARCHITECTS  
Received on 13/03/19  
  
Site and aerial photos.

**PROPOSED BUILDINGS**  
COLLADO COLLINS ARCHITECTS  
Received on 01/04/19



0m 2m 4m 6m 8m 10m

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| REV                                                                                                                                                                                                                | DESCRIPTION | DATE |
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| SCHEME REF:    | SCHEME RECEIVED: 01/04/19                         |
| DRAWING TITLE: | TWO-HOUR SUNLIGHT TEST PROPOSED CONDITION         |

|                                |                |              |           |
|--------------------------------|----------------|--------------|-----------|
| MODELLED BY: / DRAWN BY: BS/MZ | DATE: 22/07/19 | SCALE: 1:200 | <b>A3</b> |
|--------------------------------|----------------|--------------|-----------|

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|------------------|-------------|-------------|-------------|
| PROJECT No:      | RELEASE No: | VERSION No: | DRAWING No: |
| ROL00143_R03_V01 |             |             | 302-02      |

2Hr Sun-On-Ground